



Integrated Impact Assessment

Draft London Plan

Greater London Authority

Final report

Prepared by the GLA London Plan Team and LUC
June 2026

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Land Use Consultants Limited

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Chapter 1

Introduction

Purpose of this document

1.1 The Mayor is preparing a new Spatial Development Strategy (SDS) for London which will guide how the city grows and evolves over the next 20 years, with a strong emphasis on good growth: development that is sustainable, inclusive, and future-proofed.

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

1.3 Under Regulation 7 of the Town and Country Planning (London Spatial Development Strategy) Regulations 2000, SDSs are required to be accompanied by a Sustainability Appraisal (SA). SA is mandatory for Development Plan Documents (DPDs) such as SDSs, under the amended Planning and Compulsory Purchase Act 2004. For these documents, it is also necessary to conduct a Strategic Environmental Assessment (SEA) in accordance with the requirements of the SEA Directive (European Directive 2001/42/EC), as transposed into law in England by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations). The SEA Regulations require an environmental report to be prepared and made available to the public, which identifies, describes and evaluates the likely significant effects on the environment of implementing the strategy and the reasonable alternatives taking into account the objectives and the geographical scope of the strategy. SA is based on the principles of SEA but is wider in focus and covers the other key considerations of sustainability that concern social and economic issues.

1.4 The Levelling-up and Regeneration Act 2023 outlines a number of reforms to the planning system, including the replacement of the current SEA regime with a new requirement for an Environmental Outcomes Report (EOR). The specific requirements will be set out in forthcoming regulations, along with information about transition arrangements; however, at present the requirement for SEA remains as set out in existing legislation.

1.5 The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both using a single appraisal process (as advocated in the national Planning Practice Guidance), whereby users can comply with the requirements of the SEA Regulations through a single integrated process. This often incorporates other assessment processes as an Integrated Impact Assessment, or IIA.

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

IIA Report consultation

1.7 This IIA Report is being published for consultation alongside the draft London Plan and will be available for the same time period.

The London Plan

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

1.9 The current London Plan is shaped by the overarching objective of good growth. This is defined as growth that is socially and economically inclusive and environmentally sustainable. This forms the foundation of the entire Plan and guides sustainable development in London with the aim of improving health, reducing inequalities, and creating a sustainable, inclusive city by addressing housing shortages, spreading economic benefits, reducing car dependency, and using technology to improve everyday life and living standards.

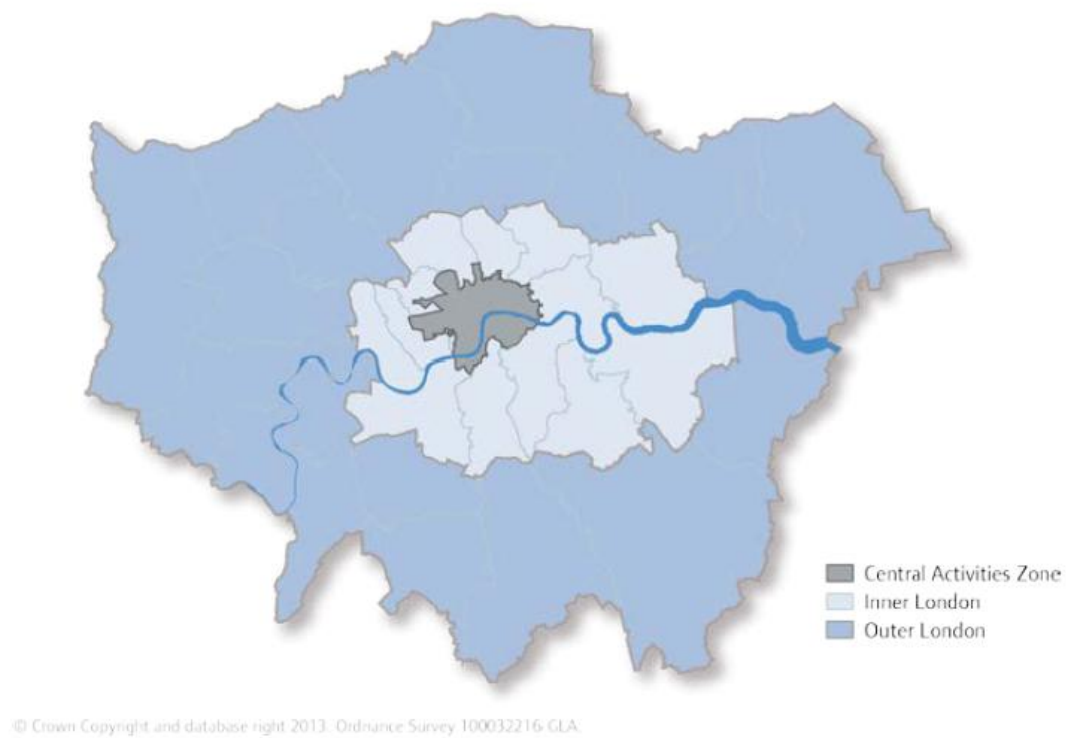
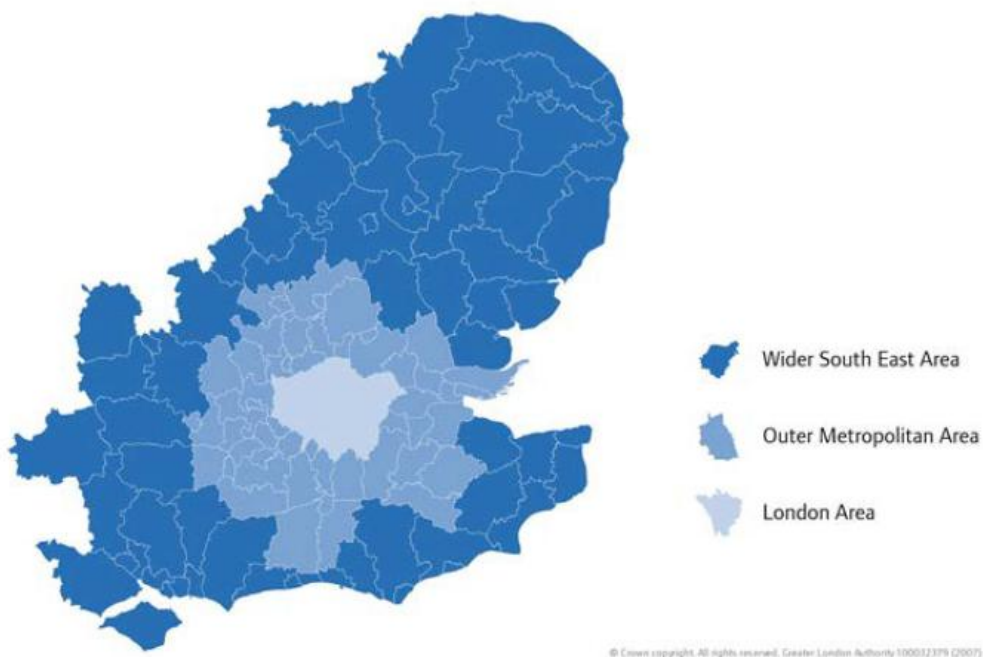
1.10 Building on these foundations, the new London Plan will include a spatial strategy that will serve as the overarching policy for growth, including broad locations for growth to meet London's identified needs and associated strategic infrastructure requirements. The detail of specific sites, including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

1.11 The new London Plan is being developed in a significantly different context than the current London Plan, most notably the requirement set by national government to plan for 84,884 new homes per year. This is a level of housing delivery that has not been neared since the 1930s. This scale of growth will inevitably lead to some impacts. Planning for this level of housing growth alongside all of London's other development needs must be done in the most sustainable way, but nonetheless this will still create pressures that require choices and trade-offs.

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

1.13 Changes to the National Planning Policy Framework (NPPF) focused on streamlining plans across the country have been announced and consulted upon. Furthermore, there are a range of challenges that are outside of planning but nonetheless impact on the context in which the new London Plan and its policies are being developed; for example supply side challenges (e.g. construction costs and labour supply), funding requirements (e.g. for affordable housing and transport infrastructure) and wider macroeconomic factors (e.g. higher interest rates and economic uncertainty).

1.14 The new London Plan will cover a period of 20 years from adoption (estimated 2028). The spatial scope refers to the geographic area that will be covered by the IIA. The London Plan applies to the Greater London Authority (GLA) administrative area, and this is the principal spatial scope for the IIA as shown in **Figure 1.1** below. 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, as shown in **Figure 1.2** below. The key geographic areas within the GLA boundary are defined by the individual London boroughs and the areas of central, inner, and outer London.

Figure 1.1: GLA administrative area showing central, inner and outer London**Figure 1.2: London and surrounding authorities in the outer metropolitan area and wider south east area**

Outline of the draft London Plan

1.15 The draft London Plan is underpinned by four 'Good Growth' objectives and 18 supporting sub-objectives. 'Good growth' is defined as "growth that drives economic productivity, is socially inclusive and environmentally sustainable". The 'Good Growth' objectives and sub-objectives are:

1. Making the best use of land

- Meet development and transport needs through optimised land use to minimise loss of greenfield land and other valued features and ensure Londoners can keep moving in the most efficient way.
- Effectively manage competing land uses to ensure sufficiency in quantum and location for different needs.
- Ensure infrastructure better addresses existing needs and supports good growth in a timely, space-efficient, and cost-effective manner.
- Enable places to renew and evolve in a way that makes the most of place-based assets and opportunities and addresses both strategic and community needs.

2. Delivering the homes and neighbourhoods Londoners need

- Address current housing shortfalls; and ensure enough good-quality homes for a growing and changing population can be brought forward.
- Improve affordability and availability of suitable homes for all, in neighbourhoods that offer housing choice and bring diverse communities together.
- Help to increase the rate, diversity and continuity of housing delivery.
- Ensure neighbourhoods provide safe, comfortable and convenient access to a range of facilities and services that address varied household and community needs.

3. Growing London's economy in a way that benefits all

- Secure sufficient space and infrastructure to enable economic activity to grow.
- Support priority growth sectors and businesses to improve their productivity and to thrive.
- Support economic clusters to evolve, to better meet the diverse and changing needs of people and businesses; and to improve their resilience to economic and social change.

- Improve access to jobs, skills and opportunities for all.
- Contribute to an accelerated shift to a more sustainable economy, reducing local and global environmental harm.

4. Creating a greener, resilient and healthy city

- Contribute to realising London's net zero-carbon ambition; and improve the resilience of people, buildings and places to climate change impacts.
- Conserve and enhance the natural environment to achieve environmental net gains; promote biodiversity and support recovery and renewal of natural systems.
- Support the creation of greener places that bring nature closer to people and a greener built environment that supports efficient resource use
- Contribute to a reduction in pollution and in exposure to pollution – supporting the ambition of achieving clean and healthy air and waterways
- Enable improvements in mental and physical health; and a reduction in health inequalities.

1.16 The draft London Plan contains 52 policies spread across the below five chapters. Each chapter starts with an overall justification of the key policies within that chapter, and at a policy level additional 'rationale' text is provided. Each chapter then contains the policies and implementation text, the latter of which aids understanding and application of the policies.

■ Chapter 2: Making best use of land and achieving Good Growth

- The policies in this chapter both distribute growth and shape it to optimise impacts and help meet the Plan's objective. The Plan seeks to deliver as much development as possible on brownfield land and supports higher density development in London.

■ Chapter 3: Delivering the homes and neighbourhoods Londoners need

- The policies in this chapter seek to deliver 558,000 homes over the next ten years, with a goal of achieving the target set by government of 850,000 beyond this period. The policies take the most ambitious approach possible in the context of land and environmental constraints in London, and deliverability limitations in the short term.

■ Chapter 4: Growing London's economy in a way that benefits all

- The policies in this chapter seek to secure good quality employment opportunities for Londoners, including those who are out of work, under-

employed or from under-represented groups in the labour market. This includes through the delivery of new employment and industrial floorspace.

■ **Chapter 5: Creating a greener, healthier, and resilient city**

- The policies in this chapter seek to ensure that development contributes to London's net zero carbon ambition, improves the resilience of the city to the impacts of climate change, helps to conserve and enhance the natural environment, reduces pollution and exposure to pollution, and improves mental and physical health outcomes for Londoners.

■ **Chapter 6: Place visions and place-based approaches.**

- The policies in this chapter provide a strategic framework for places in London that require certain approaches to development and change in light of the Plan's 'Good Growth' objectives and the overall spatial strategy. This includes how the Green Belt should be taken forward within the London context in order to help accommodate development needs.

Approach to the IIA

1.17 The purpose of the IIA is to promote sustainable development through better integration of sustainability considerations into the development of the London Plan. It brings together a number of assessments of the social, environmental, and economic impacts of planning under a single framework. It fulfils the statutory requirements and legal duties to undertake SA/SEA, EqIA, HIA, and CSIA. The approach to IIA ensures that commonalities, inter-related issues and synergies between the required assessments are identified in a systematic manner.

Equality Impact Assessment (EqIA)

1.18 The Mayor and GLA have general public body duties under equalities legislation and like all public bodies, have statutory duties to promote equality arising from the Equality Act 2010. The Mayor and the GLA also have an additional duty to promote equality of opportunity arising from the GLA Act 1999 (as amended). An assessment of impacts on equality forms an integral part of the IIA through the use of a specific assessment objective relating to equality of opportunity (see **Chapter 4**) to demonstrate how potential impacts of the London Plan on equality have been considered. In addition, a separate, standalone EqIA focusing on potential impacts on groups with the protected characteristics in the Equality Act 2010 can be found in **Appendix A** of this IIA Report.

1.19 In accordance with the Act, the EqlA considers relevant protected characteristics as follows:

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

Health Impact Assessment (HIA)

1.20 Under Section 41 (4) of the GLA Act, the Mayor has a duty to have regard to the impact of his strategies on the health of people in London and health inequalities between them. Section 30 of the GLA Act also confers a general duty for the GLA to exercise its power in a way which promotes improvements in health and reductions in health inequalities, including mitigation of any negative effects. HIA is a means of assessing the likely health effects of plans, programmes and projects. It seeks to inform and enhance the decision-making process, making decisions more holistic and robust by:

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

1.21 As part of the IIA approach, an assessment of impacts on health forms an integral element of the IIA through the use of a specific assessment objective relating to health (see **Chapter 4**) to demonstrate how potential impacts of the London Plan on health and reducing health inequalities have been considered.

Community Safety Impact Assessment (CSIA)

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

1.23 As with the EqIA and HIA, CSIA has also been incorporated into the IIA through the use of a specific assessment objective relating to community safety (see **Chapter 4**) to demonstrate how potential impacts of the London Plan on community safety have been considered.

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

Habitats Regulations Assessment

1.25 The requirement to undertake a Habitats Regulations Assessment (HRA) of development plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in July 2007, updated in 2010 and again in 2012 and 2017 [**See reference 1**]. The Regulations translate Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive) and 79/409/EEC (Birds Directive) into UK law and remain a legal requirement despite the UK exiting the European Union.

1.26 The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a European site and to ascertain whether it would adversely affect the integrity of that site, either alone or in combination with other plans or projects.

1.27 The HRA of the London Plan is being undertaken and reported on separately but the findings will be taken into account in the IIA where possible (for example to

inform judgements about the likely effects of potential development locations on biodiversity).

Meeting the requirements of the SEA Regulations

1.28 The relevant sections of this IIA Report that are considered to meet the SEA Regulations are signposted below. This information will be included in the full IIA Report at each stage of plan-making to show how the requirements of the SEA Regulations have been met throughout the IIA process.

Environmental report

1.29 The SEA Regulations [\[See reference 2\]](#) require the responsible authority to prepare, or secure the preparation of, an 'environmental report', which in this case comprises the IIA Report. The environmental report must identify, describe and evaluate the likely significant effects on the environment of the following (requirements are bolded and where each requirement is met is provided in bullets below):

An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.

- Covered in **Chapter 1, Chapter 3, and Appendix C.**

The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.

- Covered in **Chapter 3 and Chapter 4.**

The environmental characteristics of areas likely to be significantly affected.

- Covered in **Chapter 3, Chapter 4 and Appendix D.**

Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as a European site (within the meaning of regulation 8 of the Conservation of Habitats and Species Regulations 2017).

- Covered in **Chapter 3, Chapter 4** and **Appendix D**.

The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.

- Covered in **Chapter 3** and **Appendix C**.

The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the issues.

- Covered in **Chapter 5, Chapter 6** and **Chapter 7**.

The measures envisaged to prevent, reduce and as fully possible offset any significant adverse effects on the environment of implementing the plan or programme.

- Covered in **Chapter 5, Chapter 6** and **Chapter 7**.

An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.

- Covered in **Chapter 2, Chapter 5** and **Chapter 6**.

A description of measures envisaged concerning monitoring in accordance with regulation 17.

- Covered in **Chapter 8**.

A non-technical summary of the information provided under the above.

- A separate non-technical summary has been prepared to accompany this report.

The report shall include such of the information referred to in Schedule 2 to these Regulations as may reasonably be required, taking account of: current knowledge and methods of assessment; the contents and level of detail in the plan or programme; the stage of the plan or programme in the decision-making process; and the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment.

- The environmental report at each stage of the IIA will adhere to this requirement.

1.30 In terms of consultation, the SEA Regulations require that:

When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies.

- The IIA Scoping Report was subject to consultation with the statutory bodies between 19 December 2025 and 13 February 2026.

Every draft plan or programme for which an environmental report has been prepared in accordance with regulation 12 and its accompanying environmental report (“the relevant documents”) shall be made available for the purposes of consultation in accordance with the following provisions of this regulation.

As soon as reasonably practicable after the preparation of the relevant documents, the responsible authority shall:

- send a copy of those documents to each consultation body;
- take such steps as it considers appropriate to bring the preparation of the relevant documents to the attention of the persons who, in the authority’s opinion, are affected or likely to be affected by, or have an interest in the decisions involved in the assessment and adoption of the plan or programme concerned, required under the Environmental assessment of Plans and Programmes Directive (“the public consultees”);
- Inform the public consultees of

- the address of the website at which the relevant documents may be viewed and downloaded free of charge;
- the fact that a copy of the relevant documents may be obtained by email from the responsible authority;
- the fact that a copy of the relevant documents may be obtained by post from the responsible authority, provided that it is reasonably practicable for the authority to provide a copy by post;
- the address, email address and telephone number for the purpose of requesting a copy of the relevant documents either by email or by post;
- whether a charge will be made for copies of the relevant documents provided by post and the amount of any charge; and
- the telephone number which can be used to contact the responsible authority for enquiries in relation to the relevant documents;
- invite the consultation bodies and the public consultees to express their opinion on the relevant documents, specifying the address to which, and the period within which, opinions must be sent.

The period referred to in paragraph (2)(d) must be of such length as will ensure that the consultation bodies and the public consultees are given an effective opportunity to express their opinion on the relevant documents.

- This IIA Report is being published for consultation alongside the draft London Plan and will be available for the same time period.

Where a responsible authority, other than the Secretary of State, is of the opinion that a plan or programme for which it is the responsible authority is likely to have significant effects on the environment of a Member State, it shall, as soon as reasonably practicable after forming that opinion:

- notify the Secretary of State of its opinion and of the reasons for it; and
- supply the Secretary of State with a copy of the plan or programme concerned, and of the accompanying environmental report.

- Unlikely to be relevant to the London Plan, as there will be no effects beyond the UK.

1.31 In terms of taking the IIA Report and the results of the consultations into account in decision-making, the SEA Regulations require (relevant extracts of Regulation 16):

As soon as reasonably practicable after the adoption of a plan or programme for which an environmental assessment has been carried out under these Regulations, the responsible authority shall:

- publish the plan or programme, as adopted, its accompanying environmental report and a statement containing the particulars specified in paragraph (4) (“the relevant adoption documents”) on a public website at which the documents may be viewed and downloaded free of charge;
- provide a copy of the relevant adoption documents by email to any person who requests a copy, as soon as reasonably practicable after receipt of that person’s request;
- provide one copy of the relevant adoption documents by post to any person who requests a copy, as soon as reasonably practicable after receipt of that person’s request, unless it is not reasonably practicable to provide a copy by post for reasons connected to the effects of coronavirus, including restrictions on movement;
- make available a telephone number for the public to make enquiries in relation to the relevant adoption documents.

- To be addressed after the London Plan is adopted.

As soon as reasonably practicable after the adoption of a plan or programme: (a) the responsible authority shall inform: (i) the consultation bodies; (ii) the persons who, in relation to the plan or programme, were public consultees for the purposes of regulation 13; and (iii) where the responsible authority is not the Secretary of State, the Secretary of State, that the plan or programme has been adopted, and a statement containing the following particulars:

- how environmental considerations have been integrated into the plan or programme;
- how the environmental report has been taken into account;
- how opinions expressed in response to (i) the invitation referred to in regulation 13(2)(d); (ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;

- how the results of any consultations entered into under regulation 14(4) have been taken into account;
- the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and
- the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

- To be addressed after the London Plan is adopted.

- The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.

- **Chapter 8** proposes a framework for monitoring the likely significant effects of the London Plan.

Structure of the IIA Report

1.32 This chapter describes the background to the preparation of the draft London Plan, an overview of its contents and the requirement to undertake IIA and other assessment processes. The remainder of this IIA Report is structured as follows:

- **Chapter 2** describes the approach that is being taken to the IIA of the London Plan.
- **Chapter 3** describes the relationship between the London Plan and other relevant policies, plans and programmes
- **Chapter 4** summaries the environmental, social and economic characteristics of London and identifies the key sustainability issues facing the GLA area.
- **Chapter 5** presents the IIA findings for the spatial strategy options.
- **Chapter 6** presents IIA findings for the policies included in the draft London Plan document.
- **Chapter 7** presents the total combined effects of the draft London Plan as a whole, referred to as the cumulative effects.
- **Chapter 8** presents a set of indicators that can be used to monitor the significant sustainability effects of implementing the London Plan.

- **Chapter 9** presents the report conclusions and describes the next steps in the London Plan preparation and IIA processes.

1.33 The main report is supported by the following appendices:

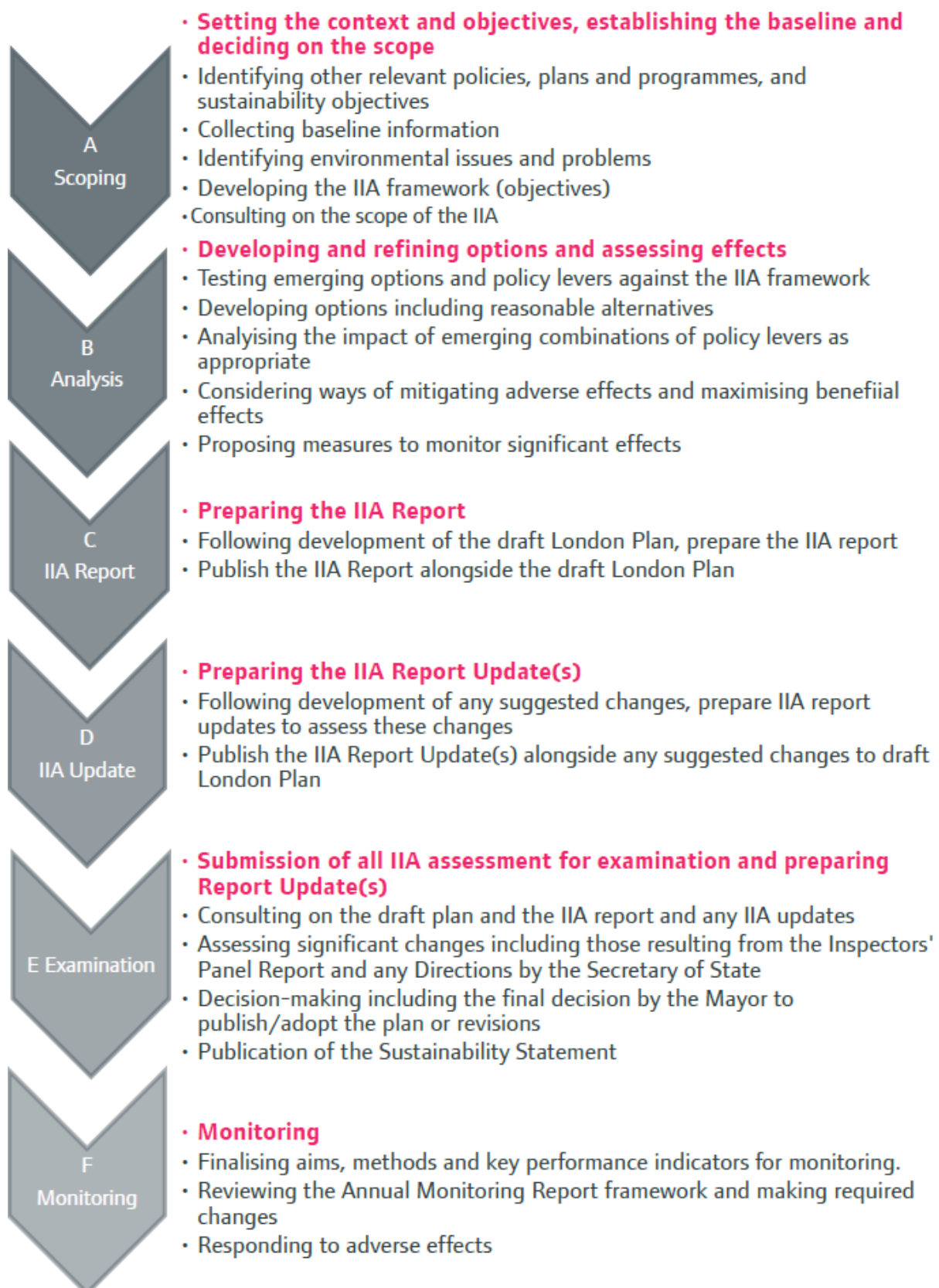
- **Appendix A** comprises the separate, standalone EqIA.
- **Appendix B** presents the consultation comments received in relation to the IIA Scoping Report and responses to each one.
- **Appendix C** presents a review of international, national and local policies, plans and programmes of relevance to the IIA.
- **Appendix D** presents the baseline information for London.
- **Appendix E** presents the criteria and assumptions that have been used to ensure consistency in the IIA of the Broad Locations for Growth considered as part of the spatial strategy options.
- **Appendix F** presents the IIA findings for the Broad Locations for Growth, which informed the appraisal of the spatial strategy options presented in **Chapter 5**.

Chapter 2

Methodology

2.1 In addition to complying with legal requirements, the approach being taken to the IIA of the London Plan is based on current good practice and the guidance on SA/SEA set out in the Government's Planning Practice Guidance. This calls for SA/SEA to be carried out as an integral part of the plan-making process.

2.2 **Figure 2.1** overleaf sets out the main stages of the plan-making process and shows how these correspond to the IIA process. As outlined in **Chapter 1**, the IIA comprises SA incorporating SEA, with the HIA, CSIA, and EqIA also presented as part of the IIA.

Figure 2.1: Corresponding stages in plan-making and IIA

2.3 The sections below describe the approach that has been taken to the IIA of the London Plan to date and provide information on the subsequent stages of the process.

Stage A: Scoping

2.4 The Scoping stage of IIA involves understanding the environmental, social, and economic baseline for the plan area as well as the sustainability policy context and key sustainability issues and using these to inform the appraisal framework as follows.

2.5 The GLA prepared the IIA Scoping Report, which was consulted upon between 19 December 2025 and 13 February 2026. The Scoping Report included the following elements of work.

Review other relevant plans, policies, and programmes to establish the policy context

2.6 A plan is not prepared in isolation; rather it is prepared within the context of other plans, policies and programmes. The SEA Regulations require the environmental report to describe the relationship of the plan with other relevant plans and programmes. It should also be consistent with environmental protection legislation and support the attainment of sustainability objectives that have been established at the international, national and regional/sub-regional levels.

2.7 A review was therefore undertaken of other policies, plans and programmes at the international, national, regional levels that were considered to be relevant to the scope of the London Plan.

2.8 The policy review has since been updated as part of the preparation of this report and is presented in **Chapter 3** and **Appendix C**.

Collect baseline information to establish sustainability context

2.9 Information on existing environmental, social and economic conditions in the plan area provides the baseline against which the plan's effects can be assessed in the IIA and monitored during the plan's implementation.

2.10 Baseline information can also be combined with an understanding of drivers of change that are likely to persist regardless of the plan to understand the likely future sustainability conditions in the absence of the plan.

2.11 The SEA Regulations require the environmental report to describe relevant aspects of the current state of the environment and how they are likely to evolve without the plan. An understanding of this likely future, together with the assessed effects of the plan itself, additionally allows the IIA to report on cumulative effects, another requirement of the SEA Regulations.

2.12 The SEA Regulations require assessment of effects in relation to the following ‘SEA topics’: biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage (including architectural and archaeological heritage), landscape, and the inter-relationship between these. Baseline information was therefore collected in relation to the SEA topics and additional sustainability topics were also addressed, covering broader socio-economic issues such as housing, access to services, crime and safety, education and employment. This reflects the integrated approach that is being taken to the IIA and SEA processes. As part of the preparation of this IIA Report, the baseline information which was originally presented in the IIA Scoping Report has been reviewed and updated. The updated baseline information for London is presented in **Appendix D** with a synopsis provided in **Chapter 4**.

Identify key sustainability issues

2.13 The baseline information also allows the identification of existing sustainability issues, including problems, as required by the SEA Regulations.

2.14 Key sustainability issues facing London were identified in the Scoping Report and are presented in **Chapter 4** along with an analysis of their likely evolution without the London Plan.

Develop the IIA framework

2.15 Development of the IIA framework is not a requirement of the SEA Regulations but is a recognised way in which the likely sustainability effects of a plan can be transparently and consistently described, analysed and compared. The IIA framework comprises a series of sustainability objectives and supporting criteria that are used to guide the appraisal of the policies and proposals within a plan. The IIA framework is presented at the end of **Chapter 4**.

Consult on the scope and level of detail of the IIA

2.16 Public and stakeholder participation is an important element of the IIA and wider plan-making processes. It helps to ensure that the IIA Report is robust and has due regard for all appropriate information that will support the plan in making a contribution to sustainable development.

2.17 The SEA Regulations require the statutory consultation bodies (the Environment Agency, Historic England and Natural England) to be consulted “when deciding on the scope and level of detail of the information that must be included” in the IIA Report. The scope and level of detail of the IIA is governed by the IIA framework. The consultation undertaken on the Scoping Report has therefore incorporated consultation with the statutory consultees on the IIA framework. This consultation on the IIA Scoping Report was undertaken between 19 December 2025 and 13 February 2026.

2.18 Appendix B lists the comments that were received on the scope of the IIA during this period of consultation and describes how each one was addressed in this IIA Report. In light of the comments received, a number of amendments were made to the review of policies, plans and programmes, the baseline information and the key sustainability issues, in addition to the IIA framework. These amendments are reflected in this IIA Report, which accompanies consultation on the draft London Plan.

2.19 The following changes were made to the IIA framework following consultation on the IIA Scoping Report.

- A new IIA objective was added in response to Historic England's representation: "IIA objective 9: Conserve and enhance assets of historical and archaeological importance and their settings".
- As part of the creation of this new IIA objective, the reference to cultural and historic assets and any relevant prompt questions were moved from IIA objective 4 which originally covered the historic environment amongst other things, to IIA objective 9.
- The reference to geodiversity assets in IIA objective 4 was moved to IIA objective 8 so that geodiversity could be considered alongside biodiversity. As part of this process, the new sub-objective "8e. Protect designated geodiversity sites" was added against IIA objective 8.
- A new strategic policy development prompt question was added against IIA objective 3 (Unlock and sustain London's economic potential across all parts of the capital ensuring stable long-term economic growth) in response to Historic

England's representation: "Does the policy sustain London's culture and heritage as sources of tourism?"

- A new strategic policy development prompt question was added against IIA objective 5 (Improve the health, community safety and wellbeing of Londoners and reduce health inequalities) in response to Sport England's representation: "Does the policy promote access to sports facilities that contribute to health and wellbeing?"
- The words "new or improved transport links or routes across barriers" were added to the first strategic spatial option prompt question against IIA objective 6 (Promote greater equality of opportunity for all and meet diverse needs to achieve a more inclusive, integrated, and fair city).

Stage B: Developing and refining options and assessing effects

2.20 Developing options for a plan is an iterative process, usually involving a number of consultations with the public and stakeholders. Consultation responses and the IIA can help to identify where there may be other 'reasonable alternatives' to the options being considered for a plan.

2.21 In relation to the IIA Report, Part 3 of the SEA Regulations 12(2) requires that:

The report must identify, describe and evaluate the likely significant effects on the environment of:

- implementing the plan or programme; and
- reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme.

2.22 Schedule 2 (h) of the SEA Regulations requires that the environmental report includes a description of:

An outline of the reasons for selecting the alternatives dealt with.

2.23 The SEA Regulations require that the alternative policies considered for inclusion in a plan that must be subject to IIA are 'reasonable', therefore alternatives that are not reasonable do not need to be subject to appraisal. Examples of unreasonable alternatives could include policy options that do not meet the

objectives of the plan (in this case the London Plan) or national policy (e.g. the NPPF).

2.24 The IIA findings are not the only factors taken into account when determining a preferred option to take forward in a plan. Indeed, there will often be an equal number of positive and negative effects identified by the IIA for each option, such that it is not possible to rank them based on sustainability performance in order to select a preferred option. Factors such as public opinion, deliverability, other pieces of evidence and alignment with national policy will also be taken into account by plan-makers when selecting preferred options for their plan.

2.25 The consideration of reasonable alternatives has been a key focus of attention within the IIA process. This section provides an overview of how policy and spatial options have been identified by the GLA, which ones are reasonable alternatives and therefore have been subject to IIA, and how this appraisal work has fed into the development of the emerging London Plan.

Spatial options

Overall spatial strategy

2.26 In identifying the overall spatial strategy in Policy MBUL1 of the draft London Plan, the GLA considered a number of spatial strategy options, which comprise a number of 'building blocks' or sources of supply, which are locations within London that could be redeveloped or newly developed to accommodate the new homes and employment space that the London Plan needs to deliver:

- Brownfield large sites
- Small sites
- Industrial land – release of some SIL/LSIS and non-designated land for residential use
- Green Belt Industrial Broad Locations for Growth (BLGs)
- Green Belt Residential BLGs around existing transport connections with some assumed enhancements
- Green Belt Residential BLGs around potential future transport connections

2.27 In respect of underlying capacity within these sources of supply, in the urban brownfield context, the GLA used the SHLAA process which excluded and discounted capacity based on various environmental constraints and embedded the

new evidence-based optimisation framework approach (in policy MBUL2) in relation to density. In the greenfield, Green Belt context, the GLA started by identifying sustainable locations based on their transport connectivity. For residential-led development, this was done by applying a buffer around stations with a good level of service (or reasonably plausible routes to securing such levels in future) to key destinations including central London. For industrial BLGs this was by applying a buffer around HGV suitable road junctions. In both cases, land was then excluded if affected by one or more primary constraints (typical physical or statutory, mostly environmental, limitations on development). And for residential, potential BLGs were only taken forward for consideration if they had capacity for 3,000 or more homes so that they would be able to support a good range of services and facilities. Densities and assumptions about the developable area within the BLGs in the Green Belt were derived from case study precedents.

2.28 Transport connectivity (and potential connectivity) is at the heart of the plan's spatial approach to all these components because it has the potential to influence so many plan (and IIA) objectives, from air quality to physical activity and health, from access to opportunity and economic productivity to carbon impacts. However, it should be noted that realising environmental opportunity is a twin concern for the GLA, and this was incorporated into capacity assumptions for the BLGs (ensuring some land is available for other uses including green infrastructure) and all spatial options.

2.29 Drawing on the work above, the amount of development the different sources of supply could help to deliver under six different spatial strategy options were considered, and these are described and assessed in **Chapter 5**.

Broad Locations for Growth in the Green Belt

2.30 The Broad Locations for Growth in the Green Belt for residential, mixed use or industrial growth were identified by the GLA using the process outlined above. The individual Green Belt BLGs have been assessed against the IIA framework in **Appendix F**.

2.31 The approach taken to estimating the capacity for residential, mixed use or industrial growth that could be provided within each BLG involved excluding areas within the buffers around stations and suitable junctions that are affected by primary constraints. These include physical and statutory limitations on development potential e.g. due to environmental protections, flood risk or existing land uses such as highways. By taking this approach, the GLA sought to anticipate and proactively manage many potential environmental impacts that might be identified through this IIA, noting that a strategic-scale plan assessment such as the London Plan IIA

cannot determine the site-specific likely effects of individual development proposals. However, these will be able to be explored in more detail through the SA/SEA or IIA of Local Plans, as more specific site allocations are proposed within the BLGs.

Development of the assessment criteria for the Broad Locations for Growth

2.32 To ensure consistency and transparency when assessing the likely sustainability effects of the development of the Green Belt BLGs (see **Appendix F**), the IIA framework is supported by a set of site assessment criteria. These criteria set out clear, mostly spatial, parameters within which defined effects would be recorded, based on factors such as the distance of Broad Locations for Growth (BLGs) from sensitive environmental receptors (e.g. designated biodiversity sites or areas of higher landscape sensitivity) and distance to key services and facilities (e.g. service centres or public transport links). More detail on the criteria used in the IIA is provided in **Appendix E** of this IIA Report.

2.33 It is important to note that while the results of the IIA are an important consideration in the selection of BLGs for development, they are by no means the only consideration. Economic viability, for example, is another key consideration which falls outside the remit of the IIA. A BLG could perform exceptionally well from an IIA perspective but if it is economically unviable, it is unlikely to be developed and thus may not be taken forward.

Policy options

2.34 In developing the draft policies, the GLA considered some different policy approaches where relevant and considered to be reasonable alternatives. These options are appraised in **Chapter 6** alongside the relevant policy.

Stage C: Preparing the IIA Report

2.35 This IIA Report describes the process that has been undertaken to date in carrying out the appraisal of the draft London Plan. The draft London Plan that is the subject of this IIA Report comprises the introduction (Overview of the Plan & Good Growth objectives), which sets out the underpinning objectives, a high-level statement of justification and statement of regard to relevant legal requirements, and the main body of the Plan, which includes five policy chapters. These chapters contain 52 policies that will guide development to ensure the delivery of the good growth objectives. These policies are spread across the following chapters within the draft London Plan:

- Making best use of land and achieving Good Growth
- Delivering the homes and neighbourhoods Londoners need
- Growing London's economy in a way that benefits all
- Creating a greener, healthier, and resilient city; and
- Place visions and place-based approaches

2.36 The IIA findings are set out in **Chapters 5, 6 and 7** of this IIA Report along with recommendations for mitigating potential negative effects and maximising the potential benefits of the draft London Plan.

2.37 Likely significant effects, both positive and negative, have been presented, taking into account the likely secondary, cumulative, synergistic, short, medium and long-term and permanent and temporary effects where possible.

Stage D: Consultation on the draft London Plan and the IIA Report

2.38 **Appendix B** presents the consultation comments received in relation to the IIA Scoping Report produced in December 2025.

2.39 The GLA is now inviting comments on the draft London Plan and this accompanying IIA Report, which will be published together for the same time period. Consultation comments on this IIA Report will be taken into account for the remaining stages of the IIA.

Stage E: Monitoring implementation of the London Plan

2.40 **Chapter 8** contains draft recommendations for monitoring the likely significant environmental, social and economic effects of implementing the London Plan, which will be updated as appropriate at the next stage of the IIA.

Appraisal methodology

2.41 The contents of the draft London Plan have been appraised against the IIA objectives in the IIA framework (see **Chapter 4**), with symbols being attributed to each option to indicate their likely effects on each IIA objective as shown in **Table 2.1**. Where a potential positive or negative effect is uncertain, a question mark was

added to the relevant symbol (e.g. +? or -?) and the symbol was colour coded in line with the potential positive, negligible or negative effect (e.g. green, white, yellow, etc.).

2.42 The likely effects of options need to be determined and their significance assessed, which inevitably requires a series of judgments to be made. The appraisal has attempted to differentiate between the most significant effects and other more minor effects through the use of the symbols shown in **Table 2.1**. The dividing line in making a decision about the significance of an effect is often quite small. Where either (++) or (--) has been used to distinguish significant effects from more minor effects (+ or -) this is because the effect of an option or policy on the IIA objective in question is considered to be of such magnitude that it will have a noticeable and measurable effect taking into account other factors that may influence the achievement of that objective.

Type and magnitude of sustainability effects

2.43 The following table shows the symbols and colour-coding that have been used to distinguish between positive, negative, minor and significant effects.

Table 2.1: Key to symbols and colour coding used in the IIA

Symbol and colour	Description
++	Significant positive effect likely
+	Minor positive effect likely
0	Negligible effect likely
-	Minor negative effect likely
--	Significant negative effect likely
++/-	Mixed significant positive and minor negative effects likely
--/+	Mixed significant negative and minor positive effects likely
+/-	Mixed minor positive and minor negative effects likely
++/--	Mixed significant positive and significant negative effects likely
?	Likely effect uncertain at this stage in the planning process and/or due to lack of data//information
N/A	Not applicable

The use of assessment criteria and uncertainty

2.44 IIA inevitably relies on an element of subjective judgement. However, in order to ensure consistency in the appraisal of the Broad Locations for Growth, detailed sets of assessment criteria were developed and applied. These were based on the IIA objectives and sub-objectives identified in the draft Scoping Report, taking into account any changes following consultation, and available datasets.

2.45 The criteria applied relate specifically to each type of Broad Location for Growth (i.e. residential or industrial). The assessment criteria set out clear parameters within which certain IIA effects would be identified, based on factors such as the distance of the locations from features such as biodiversity and geodiversity assets, open space and heritage assets. The criteria are presented in **Appendix E** of this IIA Report.

Difficulties and data limitations

2.46 The SEA Regulations, Schedule 2(8) require the Environmental Report to include:

A description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.

2.47 A number of difficulties and limitations arose in the course of the IIA as follows:

- The level of detail of the appraisal of the BLGs was commensurate with the level of detail of the London Plan document. As such, not every local characteristic could be investigated for each BLG.
- Due to the size of the BLGs, uncertainty was recorded against some objectives, as details relating to the design of these locations will not be known until planning application stage.
- Due to the fact London encompasses numerous boroughs, certain data was not consistently available across these boroughs (e.g. healthcare facilities) and so uncertain effects were sometimes recorded in the appraisal of the BLGs.
- The available GIS data for the Agricultural Land Classification did not always distinguish between Grades 3a (considered to be best and most versatile agricultural land) and 3b (not considered to be best and most versatile agricultural land). This resulted in some uncertainty in the

effects against criterion 1.1. Brownfield/greenfield land and the Agricultural Land Classification.

- In the absence of a landscape sensitivity study, the effects the BLGs receive against criterion 4.3. Landscape are uncertain.
- In the absence of a historic environment sensitivity study, the effects the BLGs receive against criterion 9.1. Historic environment are uncertain.

Chapter 3

Sustainability context

3.1 Schedule 2 of the SEA Regulations requires:

- An outline of the contents and main objectives of the plan or programme, and its relationship with other relevant plans or programmes.
- The environmental protection objectives established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.

3.2 An outline of the draft London Plan was provided in **Chapter 1**.

Relationship with other relevant plans or programmes

3.3 The London Plan is not prepared in isolation and must be in accordance with a range of international, national and sub-national plans and programmes. The document needs to be consistent with international and national guidance and strategic planning policies and should contribute to the goals of a wide range of other programmes and strategies, such as those relating to social policy, culture and heritage. Key Mayoral strategies include:

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

3.4 The London Plan must also align with environmental protection legislation and the sustainability objectives established at an international, national and regional level. It should be noted that the policy context is inherently uncertain as the current framework outlined here is likely to change in response to a number of key factors:

- The Levelling-up and Regeneration Act 2023 [\[See reference 3\]](#) sets out various planning reforms including the replacement of the SA/SEA regime with ‘Environmental Outcomes Reports’;; a shared framework of National Development Management Policies, removing much of this detail from plans;; repeal of the Duty to Cooperate; a duty on public bodies and infrastructure providers to assist the plan-making process; a speeded up Local Plan-making process (Local Plans to be prepared and adopted within 30 months); and a strengthened role for the ‘national model design code’. However, a number of the Act’s reforms remain to be implemented via more detailed, secondary legislation.
- The Planning and Infrastructure Act 2025 [\[See reference 4\]](#) seeks to support quicker delivery of homes, transport links, and clean energy projects. The Act will be implemented through new secondary legislation and guidance to provide specific detail for the high-level reforms in the Act.

3.5 It is also likely that UK and sub-national climate change policy will change as public awareness and prioritisation of the threat of climate change grows, as illustrated by the increasing number of strategic regional and local authorities that have declared a climate emergency.

3.6 Similarly, there is growing evidence of and momentum behind the need for policy change in response to the biodiversity crisis. Over a quarter of strategic regional and local authorities have declared a nature emergency [\[See reference 5\]](#) and a 2026 UK government security assessment identified global biodiversity loss and ecosystem collapse as direct, severe threats to national security [\[See reference 6\]](#).

Environmental protection (and sustainability) objectives established at international or national level

3.7 At the international level, there is a wide range of plans and programmes that inform and shape national level legislation. Planning policy in England at a national, regional and local level (i.e. the National Planning Policy Framework, SDSs and Local Plans) should be aware of and in accordance with the relevant legislation. The main sustainability objectives of international plans and programmes that are of most relevance for the London Plan and the IIA are described in **Appendix C**.

3.8 There is an extensive range of national policies, plans and programmes that are of relevance to the London Plan and IIA process. A pragmatic and proportionate approach has been taken with regards to the identification of key national policies,

plans and programmes, focusing on those that are of most relevance. A summary of the main objectives of the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) of relevance to the London Plan and the IIA is provided below.

3.9 In addition, the main sustainability objectives of other national plans and programmes which are of most relevance for the London Plan and the IIA are described in **Appendix C**.

National Planning Policy Framework and Planning Practice Guidance

3.10 The NPPF is the overarching planning framework that provides national planning policy and principles for the planning system in England. The Government recently consulted on a new version of the NPPF [\[See reference 7\]](#), a revised version of which is expected to be published later this year.

3.11 The three overarching objectives of the planning system are set out in paragraph 8 of the NPPF, which should be pursued in mutually supportive ways so that net gains are achieved across each of the different objectives:

- “an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and
- an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”

3.12 The London Plan must be consistent with the requirements of the NPPF, which states:

- “Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings.”

3.13 The current 2024 version of the NPPF introduces a requirement for Green Belt boundaries to be reviewed under certain conditions. Specifically, if an authority cannot meet its identified needs for homes, commercial or other development through alternative means, it is mandated to review its Green Belt boundaries. This version of the NPPF also includes a new designation for some sections of land currently designated as Green Belt, referred to as grey belt. Grey belt is defined in the NPPF as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b) or (d) of the Green Belt, as specified in paragraph 143 of the NPPF. Therefore, grey belt does not always comprise previously developed land.

3.14 Where it is necessary to release Green Belt land for development, plans should first give priority to previously developed land in the Green Belt, followed by land not previously developed in the Green Belt that is identified as grey belt and then other Green Belt locations. According to the NPPF, the need to promote sustainable patterns of development should determine whether a site's location within the Green Belt is appropriate or not.

3.15 Paragraph 20 of the NPPF states the need for strategic policies in plan-making, which set out the overall strategy for the pattern, scale and design quality of places, making sufficient provision for:

- “a) homes (including affordable housing), employment, retail, leisure and other commercial development;
- b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- c) community facilities (such as health, education and cultural infrastructure); and
- d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.”

3.16 Planning Practice Guidance (PPG) [\[See reference 8\]](#) provides guidance for how the Government’s planning policies for England are expected to be applied.

Sitting alongside the NPPF, it provides an online resource that is updated on a regular basis for the benefit of planning practitioners.

Other national policies, plans and programmes

3.17 Numerous other policies, plans and programmes at a national level are of relevance to the preparation of the London Plan and the IIA. Unlike the NPPF, most of the documents are focussed on a specific topic area which the IIA will consider. There will be some overlap between IIA topics covered by these plans and programmes where those documents contain more overarching objectives. However, the plans and programmes considered of most relevance to the IIA have been grouped by the topics they most directly seek to address, and the sections below each topic heading summarise the implications of the national policies, plans and programmes for the London Plan and IIA.

Climate change adaptation and mitigation, energy efficiency and waste minimisation

3.18 The relevant national policies, plans and programmes under this topic are:

- Clean Energy Industries Sector Plan (2025)
- The Hydrogen Update to the Market (2025)
- The Onshore Wind Strategy (2025)
- Carbon Budget and Growth Delivery Plan (2025)
- Environmental Improvement Plan (2025)
- The Clean Power 2030 Action Plan (2024)
- The updated Thames Estuary 2100 Plan (2023)
- Carbon Budget Delivery Plan (2023)
- Powering Up Britain (2023)
- The Net Zero Growth Plan (2023)
- Energy Security Plan (2023)
- The Environment Act (2021)
- The Industrial Decarbonisation Strategy (2021)
- The Heat and Buildings Strategy (2021)

- Energy Performance of Buildings Regulations (2021)
- The Waste Management Plan for England (2021)
- National Infrastructure Strategy: Fairer, Faster, Greener (2020)
- Decarbonising Transport: Setting the Challenge (2020)
- Sixth Carbon Budget (Climate Change Committee, 2020)
- Flood and Coastal Erosion Risk Management: Policy Statement (2020)
- The National Flood and Coastal Erosion Risk Management Strategy for England (2020)
- The Waste (Circular Economy) (Amendment) Regulations (2020)
- Net Zero – The UK’s Contribution to Stopping Global Warming (2019)
- The Flood and Water Management Act 2010 and The Flood and Water Regulations (2019)
- Climate Change Act (2008) and Climate Change Act 2009 (2050 Target Amendment) Order (2019)
- The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the Country Resilient to a Changing Climate (2018)
- Our Waste, Our Resources: A Strategy for England (2018)
- National Planning Policy for Waste (NPPW) (2014)
- The Energy Efficiency Strategy: The Energy Efficiency Opportunity in the UK (2012)
- Planning and Energy Act (2008)

Implications for the London Plan and IIA

3.19 The London Plan should consider setting out policies to achieve climate change mitigation and adaptation while also encouraging development which would help to minimise carbon emissions.

3.20 The London Plan should help to ensure that new development is energy efficient and promotes the use of sustainable construction methods and materials, as well as reduce their carbon emissions. In addition, the Plan should seek to direct development to areas where sustainable transport patterns can be best achieved and encourage development to make use of more sustainable sources of energy,

potentially through the delivery of renewable energy development. The Plan should also ensure that risk from all sources of flooding as a result of climate change is managed effectively and should ensure that development is resilient to future flooding. This could include the London Plan setting out approaches to encourage the appropriate use of SuDS to minimise flood risk. The Plan should also consider the handling of waste in line with the waste hierarchy.

3.21 The IIA can test policy options in relation to the contributions they make towards these aims. It should also appraise the contribution London's Broad Locations for Growth (see **Chapter 5**) can make to limiting carbon emissions (including through the uptake of more sustainable sources of energy). Broad Locations for Growth (BLGs) should also be considered in terms of the impact they will have in promoting climate change adaptation as well as reducing flood risk and the amount of waste that goes to landfill.

Health and well-being

3.22 The relevant national policies, plans and programmes under this topic are:

- Planning and Infrastructure Bill (2025)
- Renters' Rights Act (2025)
- Healthy Homes – a foundation for healthier and resilient communities (2025)
- 10 Year Health Plan for England (2025)
- Planning Policy for Traveller Sites (2024)
- Plan for Change (2024)
- Levelling Up and Regeneration Act (2023)
- Green Infrastructure Framework (2023)
- Anti-Social Behaviour Action Plan (2023)
- Homes England Strategic Plan 2023-2028 (2023)
- UK Health Security Agency Strategy Strategic Plan 2023-26
- National Design Guide (2021)
- The State of the Environment: Health, People and the Environment (2021)
- Build Back Better: Our Plan for Health and Social Care (2021)
- Using the Planning System to Promote Healthy Weight Environments (2020)
Addendum (2021)

- The Charter for Social Housing Residents: Social Housing White Paper (2020)
- Public Health England, PHE Strategy 2020-2025 (2019)
- Environmental Noise Regulations (2006) (as amended 2018)
- Spatial planning for health: evidence review (2017)
- Technical Housing Standards – Nationally Described Space Standard (2015)
- Select Committee on Public Service and Demographic Change Report Ready for Ageing? (2013)
- Fair Society, Healthy Lives (2010)
- Environmental Noise Regulations (2006)

Implications for the London Plan and IIA

3.23 The London Plan needs to consider the need for infrastructure as this has a significant impact on the environment, and it should be prepared to ensure that the population has access to sustainable low carbon infrastructure and services and facilities and that there is sufficient capacity within them to serve the increased population. This should include healthcare, education and open space. Development should be located in areas where facilities are most accessible, issues of overcapacity would be less likely to result, and active modes of travel might be promoted. Policies included in the London Plan can also help to facilitate the supply of healthy local food, for example by encouraging the provision of allotments. The provision of an appropriate level of housing over the Plan period will help address issues of disparity in terms of access to decent housing in the Plan area. The provision of new housing should be considerate of local needs with regards to housing size, tenure and type, including the needs of Gypsies, Travellers and Travelling Showpeople.

3.24 Policy options considered for the London Plan can be tested through the IIA in relation to the contributions they make towards these aims. The IIA should also appraise the contribution the spatial development strategy can make to health and well-being. This should be considered in relation to the ability to support the delivery of new infrastructure and facilities which might benefit public health, as well as accessibility to existing infrastructure and facilities of this nature. The capacity of existing facilities may also need to be considered. Consideration should also be given to the London Plan's ability to deliver the required number of new homes, including affordable homes.

Environment (biodiversity/geodiversity, landscape and soils)

3.25 The relevant national policies, plans and programmes under this topic are:

- Environmental Improvement Plan (2025)
- The Waste Prevention Programme for England: Maximising Resources, Minimising Waste (2023)
- Green Infrastructure Framework and associated 15 GI Principles (2023)
- Working with Nature (2022)
- Establishing the Best Available Techniques for the UK (UK BAT) (2022)
- The Environment Act (2021)
- 25 Year Environment Plan: Progress Reports (2020)
- The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations (2019)
- An Approach to Landscape Sensitivity Assessment (2019)
- Environmental Damage (Prevention and Remediation) Regulations (2015)
- Defra Right of Way Circular (01/09) (2011)
- Countryside and Rights of Way Act (2010)
- Safeguarding Our Soils – A Strategy for England (2009)
- Natural Environment and Rural Communities Act (2006)
- Wildlife and Countryside Act (1981) (as amended)
- National Parks and Access to the Countryside Act (1949)

Implications for the London Plan and IIA

3.26 The London Plan should be prepared to limit the potential for adverse impacts on biodiversity and geodiversity as well as important landscapes (including those that are designated) and higher value soils. The Plan area contains a number of important biodiversity sites which will need to be protected through planning policy. The Plan should also take into account non-designated landscapes identified to be particularly sensitive to development and non-designated habitats which form part of wider ecological networks. The Plan also presents opportunities to promote the achievement of net gains in biodiversity. Measures may include the incorporation of new green-blue corridors to support the passing of wildlife and water through new

developments and which will also help to reduce higher rates of surface water runoff. These aims may be supported through the appropriate update of the spatial strategy. It can also be used to encourage the re-use of brownfield land and protect more valuable agricultural soils from development. Benefits may be achieved by directing development to less sensitive locations. Updated planning policy can also be used to achieve habitat connectivity through the provision of new green infrastructure.

3.27 It will be the role of the IIA to test the policy options in terms of the effect they will have on biodiversity sites and habitats as well as valued landscapes. The effects of these options in relation to promoting the development of brownfield land and limiting the loss of valuable agricultural soils should also be appraised. The findings of the Habitats Regulations Assessment should inform the appraisal of the options where appropriate.

Historic environment

3.28 The relevant national policies, plans and programmes under this topic are:

- Historic England Corporate Plan 2023-2026 (2023)
- National Design Guide (2021)
- Heritage Statement (2017)
- Sustainability Appraisal and Strategy Environmental Assessment: Historic England Advice Note 8 (2016)
- Planning (Listed Buildings and Conservation Areas) Act (1990)
- Town and Country Planning Act 1990
- Ancient Monuments and Archaeological Areas Act (1979)
- Historic Buildings and Ancient Monuments Act (1953)

Implications for the London Plan and IIA

3.29 The potential impact of new development on the historic environment, including local character as well as designated and non-designated heritage assets and their respective settings should also inform the preparation of the London Plan. Particular regard may be given to protecting heritage assets which have been identified as being 'at risk' (both at the national and local level).

3.30 The IIA should appraise options for the London Plan in terms of the potential for effects on the historic environment. The IIA will help identify which BLGs are more

likely to have adverse effects on the historic environment, helping inform the selection of preferred BLGs. The London Plan should seek to protect and enhance the historic environment.

Water and air

3.31 The relevant national policies, plans and programmes under this topic area:

- The National Framework for Water Resources 2025: Water for Growth, Nature and a Resilient Future (2025)
- Environmental Improvement Plan (2025)
- National Assessment of Flood and Coastal Erosion Risk in England (2025) ('NaFRA 2')
- Drought Response: how it is managed in England (2025)
- Plan for Water: Our Integrated Plan for Delivering Clean and Plentiful Water (2023)
- Air quality strategy for England (2023)
- National Flood and Coastal Erosion Risk Management Strategy for England (2022)
- The Industrial Decarbonisation Strategy (2021)
- Managing Water Abstraction (2021)
- Environment Act (2021)
- National Chalk Streams Strategy Chalk Stream Strategy (2021)
- Meeting Our Future Water Needs: A National Framework for Water Resources (2020)
- The Flood and Water Management Act 2010 and The Flood and Water Regulations (2019)
- Clean Air Strategy (2019)
- Environmental Noise Regulations (2006) (as amended 2018)
- Water Supply (Water Quality) Regulations 2018
- Water Environment (Water Framework Directive) (England and Wales) Regulations (2017)
- UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations (2017)

- Environmental Permitting Regulations (2016)
- Nitrate Pollution Prevention Regulations (2016)
- Air Quality Standards Regulations (2016)
- Groundwater (England and Wales) Regulations (2009)
- Safeguarding our Soils – A Strategy for England (2009)
- Urban Wastewater Treatment Regulations (2003)
- Environmental Protection Act (1990)

Implications for the London Plan and IIA

3.32 Strategic planning authorities should consider setting out approaches in their plans to promote the efficient use of water and limit all types of pollution including water and air pollution. They should also seek to limit pressure on wastewater treatment (WwT) infrastructure and water supply. The allocation of BLGs for development should take account of areas which are of highest sensitivity in relation to these issues, including Source Protection Zones (SPZs) and Air Quality Management Areas (AQMAs). To limit the potential for air quality issues to be intensified as development is delivered over the Plan period, strategic planning authorities should consider setting out approaches in their Plan to factor in the contribution that specific site options can make to achieving modal shift and limiting the need for residents to travel.

3.33 The contribution policy options can make to achieving these aims can be tested through the IIA. Options can be considered in relation to particular sensitivities of the WwT infrastructure and other identified areas (such as SPZs and AQMAs).

Economic growth

3.34 The relevant national policies, plans and programmes under this topic are:

- Planning and Infrastructure Bill (2025)
- Infrastructure: A 10 Year Strategy (2025)
- The UK's Modern Industrial Strategy (2025)
- UK Infrastructure Pipeline (2025)
- The Plan for Change (2024)
- Agricultural Transition Plan 2021-2024 (update 2024)

- Agriculture Act (2020)
- LEP Network response to the Industrial Strategy Green Paper Consultation (2017)

Implications for the London Plan and IIA

3.35 The London Plan should identify land to support the projected level of economic growth required over the Plan period. Strategic planning authorities should consider setting out approaches in plan policies to promote sustainable economic and employment growth to benefit all members of the community and to reduce disparity in the plan area. This should include support for the infrastructure required for the economy to function successfully. London's industrial BLGs should be located to enable local people to be able to access the new employment opportunities. London Plan policies may also seek to promote the viability of town and neighbourhood centres.

3.36 The IIA can test options in relation to the contribution they can make to achieving these aims. Options should be appraised in terms of the contribution they can make to meeting the industrial land requirements of the GLA area as well as the access residents would have to the employment opportunities delivered.

Transport

3.37 The relevant national policies, plans and programmes under this topic are:

- UK Infrastructure: A 10 Year Strategy (2025)
- Future of Transport: Supporting Rural Transport Innovation (2023)
- National Highways Environmental Sustainability Strategy (2023)
- The second cycling and walking investment strategy (CWIS2) (2023)
- Cycling and Walking Investment Strategy Report to Parliament (2022)
- Future of Freight Plan (2022)
- Decarbonising Transport: A Better, Greener Britain (2021)
- The Environment Act (2021)
- Decarbonising Transport: A Better, Greener Britain (2021)
- Decarbonising Transport: Setting the Challenge (2020)

Implications for the London Plan and IIA

3.38 The potential for reducing the need to travel, limiting congestion and associated benefits for air quality and climate change as well as public health should inform the preparation of the policies for the London Plan and its BLGs. The London Plan should also encourage walking and cycling as alternative modes of transport by providing safe and attractive walking and cycling infrastructure, as well as recognise the multiple benefits they bring in terms of physical and mental health, reducing carbon emissions and reducing air pollution. Furthermore, the selection of BLGs for development should be informed by issues such as the potential for access to new and existing public transport nodes and active transport routes and specific highways capacity issues. The selection of individual BLGs should also be informed by their proximity to essential services and facilities which is likely to reduce the need for residents to regularly travel long distances.

3.39 The IIA should be used to test options in terms of the contribution they can make to making transport choices more sustainable in the GLA area. This includes the contribution they make to the uptake of more sustainable transport options, such as walking and cycling and public transport.

Regional policy context

3.40 Below the national level there are further plans and programmes that are of relevance for the London Plan and the IIA process. These plans and programmes sit mostly at the regional level. Details of those plans and programmes that are of most relevance at this level are provided in **Appendix C**.

3.41 The following sections summarise the implications of the regional policy review for the London Plan and the IIA.

- **Population and human health:** The London Plan should seek to provide open space and green infrastructure of sufficient quantity and quality to meet the needs of the Plan area; to encourage healthy and active lifestyles; to create fair, safe and inclusive communities; reduce inequality in health and wellbeing; and to improve the sustainable transport network within the Plan area. The London Plan should seek to create and maintain safe and attractive public spaces that encourage people to walk and cycle, promote a sense of place and reduce the need to travel. The London Plan should seek to provide opportunities for education, skills and employment that will help all to succeed in life and advance equality of opportunity. The IIA is able to respond to this through the inclusion of IIA objectives relating to health and wellbeing, social inclusion, and sustainable transport.

- **Economy:** The London Plan should support the sustainable growth of income and employment as well as the enhancement of productivity and investment within London's economy. The IIA is able to respond to this through the inclusion of IIA objectives relating to economic growth and employment.
- **Transport connections and travel habits:** The London Plan should encourage sustainable modes of transport in order to improve air quality, minimise climate change and reduce congestion. The London Plan should also encourage walking and cycling as alternative modes of transport by locating key services and employment opportunities close to where people live and by providing safe and attractive walking and cycling infrastructure, as well as recognise the multiple benefits they bring in terms of physical and mental health, reducing carbon emissions and reducing air pollution. The IIA is able to respond to this through the inclusion of IIA objectives relating to the mitigation of climate change, improving air quality, public health and wellbeing, and the provision of sustainable transport.
- **Air, land and water quality:** The London Plan should seek to minimise the contamination of land, water and air, and to ensure the effective management of waste and water and the efficient extraction of minerals. The IIA is able to respond to this through the inclusion of IIA objectives relating to air pollution, water quality, land contamination, waste management, and the efficient use of land.
- **Climate change mitigation and adaptation:** The London Plan should seek to ensure that new development reduces carbon emissions, is energy efficient, and promotes the use of renewable energy sources and sustainable construction methods and materials. The London Plan should encourage new development to be designed to adapt to climate change for the increased likelihood of extreme weather events including overheating as a result of temperature rise. The London Plan should also seek to ensure that risk from all sources of flooding as a result of climate change is avoided where possible, and where this is not possible, that the risks are managed effectively to ensure that development is resilient to future flooding, as well as improve the transport network across the Plan area including by encouraging a modal shift towards public transport, walking and cycling, and reduce the need to travel by car. The IIA is able to respond to this through the inclusion of IIA objectives relating to the mitigation of climate change and adaptation to climate change, sustainable construction, flooding and sustainable transport.
- **Biodiversity:** The London Plan should seek to manage, protect and enhance ecological features and biodiversity and encourage habitat restoration or creation. The London Plan should also seek to ensure that environmental

pollution is minimised in order to protect land, water and air quality. The London Plan should seek to take the following themes into account: conservation; creation; connection; and celebration. The London Plan should embed the principle of environmental net gain and tackling invasive species. The IIA is able to respond to this through the inclusion of IIA objectives relating to the protection and enhancement of biodiversity, air pollution, water quality and contaminated land.

- **Historic environment:** The London Plan should seek to conserve and enhance the historic environment, including heritage and cultural assets (both designated and non-designated) and to support local character and distinctiveness. Particular regard should be given to protecting heritage assets which have been identified as being 'at risk' (both at the national and local level). Policies should be included to address these issues, and BLGs should be considered with regard to the potential for adverse effects on the historic environment. The IIA framework should include objectives relating to the conservation and enhancement of the historic environment and the character of landscapes and townscape. The IIA should appraise both policy and BLGs in terms of the potential for effects on the historic environment, taking into account climate change. It should identify those locations at which development would have the greatest potential to adversely impact the historic environment, as informed by heritage impact assessment work for the London Plan.
- **Landscape:** The London Plan should seek to protect and enhance designated and valued landscapes; protect and enhance the quality and distinctiveness of natural landscapes and townscape; promote high quality design that respects and enhances local character; and ensure tourism is compatible with protection of biodiversity, landscapes and townscape. The London Plan should seek to increase recognition of the linkages and interplay between the different aspects and roles of landscape, including local distinctiveness; the historic environment; natural resources; farming, forestry and food; educational, leisure and recreation opportunities; transport and infrastructure; and settlements and nature conservation. The IIA is able to respond to this through the inclusion of IIA objectives relating to the character of landscapes and townscape and green infrastructure.

Baseline information

3.42 The baseline information is the starting point to help ensure a robust assessment of the potential effects (positive or negative) of the new London Plan policies as they are developed, as well as assessing reasonable alternative policy approaches. The baseline establishes the current state of the environmental, social,

and economic characteristics which are likely to be affected by the London Plan, and their likely evolution without implementation of new policies.

3.43 The SEA Regulations list a number of topics that should be considered: biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage, including architectural and archaeological heritage, landscape and the interrelationships between these factors. Data has been collated and analysed for the required SEA topics alongside data on other topics relevant to the SA, HIA, EqIA, and CSIA components of the IIA.

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

3.45 The baseline is constantly evolving and will be subject to change over time as and when new information becomes available. Where there are data gaps in relation to specific issues, further information to address these gaps will be sought on an ongoing basis and the baseline updated where necessary. The London Plan Annual Monitoring Reports [\[See reference 9\]](#) cover the Key Performance Indicators (KPIs) defined in the London Plan and include additional data and narrative about how the Plan is performing against the Good Growth objectives and environmental, social and economic impacts as well as reporting any unanticipated equalities impacts.

3.46 GLA City Intelligence publishes State of London Reports [\[See reference 10\]](#), which aim to provide the most comprehensive and up-to-date picture of London's economic and social realities. The latest report was published in June 2025 and brings together over 100 datasets organised by 11 themes with the aim of informing the work of the Mayor, the London Assembly, and stakeholders in London. In addition to providing open access to over a thousand datasets, the London Datastore [\[See reference 11\]](#) also compiles data into thematic evidence bases including Equality, Diversity and Inclusion [\[See reference 12\]](#); Social [\[See reference 13\]](#); Economic Fairness [\[See reference 14\]](#); and Health Inequalities [\[See reference 15\]](#).

Chapter 4

Key sustainability issues and IIA framework

4.1 Through the review of both the relevant plans, policies, and programmes (**Chapter 3** and **Appendix C**) and the baseline information (**Appendix D**), key environmental, social and economic issues and challenges facing London have been identified. The broad challenges identified, along with implications and opportunities for the London Plan, are set out below, grouped by topic. It should be noted that some challenges naturally overlap more than one topic and where this is the case, they have not been repeated.

4.2 In accordance with the requirements of the SEA Regulations, consideration is given to the likely evolution of these issues if the new London Plan were not to be implemented. It is important to note that the absence of a new London Plan would not result in growth and development in London coming to a halt. The National Planning Policy Framework (NPPF) and adopted Local Plans would continue to operate as key planning considerations and would play an important role in guiding development in London. In this context, development proposals would continue to be assessed against the provisions of the NPPF, with the presumption in favour of sustainable development applying where development plan policies are considered out-of-date.

4.3 Over time, however, the existing London Plan (2021) would become increasingly outdated and greater weight would be afforded to the NPPF and Local Plans in decision-making. The assessment of the absence of the new London Plan therefore considers the implications this will have on London's key sustainability issues.

Population growth and demographic change

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

4.5 London has historically experienced very high levels of migration and mobility (population churn), with large net international inflows offset by similarly large net

domestic outflows. These demographic characteristics create differing requirements for economic and social infrastructure. Projected substantial population growth coupled with its changing composition will lead to increased pressure and competition for land for different types of development.

Key issues

- London's population has continued its long-term pattern of growth and is the youngest and most ethnically diverse region of the UK.
- The number of children is decreasing as a share of overall residents and inner London boroughs saw large decreases in the number of younger children over the last decade.
- London historically experiences a high rate of demographic change resulting in differing requirements for economic and social infrastructure.
- The population is also aging with an increasing proportion of over 65s.
- Population growth in London is projected to be substantial and will lead to increased pressure and competition for land for different types of development.

Likely evolution of the baseline in the absence of the new London Plan

4.6 Without the new London Plan it is likely that London's population will continue to grow, following historical migration and mobility patterns, creating differing pressures and requirements for housing and economic and social infrastructure.

4.7 The national government housing need figure will be the default position, and the lack of a new London Plan and spatial strategy will make it harder for boroughs to achieve, triggering the NPPF's presumption in favour of sustainable development and possibly leading to planning by appeal.

4.8 Without a spatial strategy based on capacity and planned redistribution across London there will be greater pressures on boroughs to meet unrealistic targets within their areas. This would continue to place strain on resources and increase competition for land in London making it difficult for boroughs to plan and provide for services and facilities to support growth.

Climate change mitigation and adaptation

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

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

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

Key issues

- London's climate is changing with extreme weather events harming the economy and the health of Londoners.
- The poorest and most disadvantaged Londoners are most sensitive to the impacts of climate change, despite having the lowest carbon emissions. An

aging population will increase the number of people vulnerable to climate change.

- London is not currently meeting the Mayor's CO₂ emissions targets to reach net-zero by 2030.
- Upgrading London's existing energy system will be key to achieving this as well as reducing emissions from transport and new buildings and minimising energy demand.
- New development will need to be designed to adapt to climate change taking into account issues such as overheating, flood risk, water quality and supply.
- Opportunities to minimise water use and creating blue infrastructure to help reduce the impacts of planned growth should be encouraged.

Likely evolution of the baseline in the absence of the new London Plan

4.12 In the absence of the new London Plan the Mayor will continue to set CO₂ emissions targets and national carbon reduction targets will apply. The National Planning Policy Framework (NPPF) 2024 includes, within its environmental objective, requirements to mitigate and adapt to climate change, guiding development to incorporate adaptation measures that reduce greenhouse gas emissions.

4.13 However, the new London Plan will provide a more robust and coordinated framework to enable development to contribute effectively to these targets by promoting sustainable development. This includes requiring new development to be energy efficient during both construction and occupation, encouraging connections to Heat Network Zones, and seeking to mitigate the adverse effects of the Urban Heat Island.

4.14 Without these London-wide policy safeguards, London's climate risk will increase as the frequency and intensity of climate related hazards (e.g. heat and drought) escalate and population vulnerability also rises. In the absence of policies to support rapid decarbonisation, Londoners will continue to be exposed to energy shocks and fuel poverty will also increase. Both of these drivers will exacerbate existing inequalities.

4.15 In addition, without a new London Plan to target priority areas for surface water management, development will continue to contribute to London's surface water flood risk. Due to climate change both the risk and intensity of major flash floods have increased. A new London Plan can provide a coordinated and strategic

approach to improving resilience, particularly in areas identified for significant growth and change.

Health and community safety

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

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

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

4.19 Londoners are not breathing clean air. Despite significant progress, London still exceeds the World Health Organization's (WHO's) recommended health-based guidelines and air pollution from road transport remains an important source of emissions. Impacts of poor air quality do not fall equally across the city; poorer and Black, Asian and Minority Ethnic communities are more likely to live in areas with poorer air quality. Children, older people and those with existing health conditions are

particularly vulnerable to the effects of air pollution. Every school and hospital in London is in an area that exceeds the WHO-recommended guidelines.

4.20 London is a relatively safe city when compared to other global cities and the likelihood of being a victim of crime is low in London. However, as a global city it is at higher risk of terrorist attacks than other cities in the UK. Heightened risks of threats to security can impact London's economic competitiveness and tourism. Violent crime in London is disproportionately concentrated in deprived areas, with significant local variations, and disproportionately affects specific socio-demographic groups, including young Black men, men in general (except for domestic violence where women are most affected), and people with disabilities.

Key issues

- The Government's new 10 Year Health Plan prioritises shifting from Sickness to Prevention, requiring spatial planning to prioritise health infrastructure and housing that supports people with complex needs to live at home.
- There are stark health and socioeconomic inequalities in London with a more than 10-years variation in healthy life expectancy between London boroughs.
- Londoners are living with complex health needs for longer, resulting in increased pressure on the health sector.
- The causes of death and long-term conditions prevalent in London are driven by risk factors such as obesity, physical inactivity and air pollution, which in turn are influenced by the built environment.
- In London there are large populations of people in inclusion health groups (e.g. people experiencing homelessness, asylum seekers and refugees, and Gypsy, Roma and Traveller communities) with greater risk of poor health.
- Air pollution from road transport remains an important source of emissions with more deprived and Black, Asian and Minority Ethnic communities affected more severely.
- Younger and older people are particularly vulnerable to the effects of air pollution.
- As a global city London is at higher risk of terrorist attacks than other cities in the UK.
- Violent crime in London is disproportionately concentrated in deprived areas and disproportionately affects specific socio-demographic groups.

Likely evolution of the baseline in the absence of the new London Plan

4.21 In the absence of the new London Plan, health risk factors could continue to increase, although public health campaigns may help to reduce this.

4.22 Air quality has improved dramatically since 2016; however, this could deteriorate without the strategic London-wide approach provided by the new London Plan, particularly its focus on securing improvements in areas of greatest vulnerability.

4.23 Health inequalities could also widen without the new London Plan's contribution to tackling the social and environmental determinants of health. London Plan policies will support active travel, access to green space and healthy food, and recreational opportunities, all of which play an important role in improving health outcomes and reducing inequalities.

4.24 Without a new spatial strategy, development may occur in unsustainable locations that are poorly supported by social infrastructure. This could undermine community cohesion and exacerbate social inequalities.

4.25 Crime, and the fear of crime can contribute to social isolation and limit access to employment and social activities, particularly for vulnerable groups. A new London Plan will require development to support the safety and security of communities through high-quality design, including measures that improve safety and security for women, girls and other vulnerable groups.

Equality of opportunity

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

4.27 While London has world-leading levels of public transport connectivity, including to some of the highest concentrations of employment density in the world, there are

imbalances within London. For example, in connectivity between inner London and outer transport hubs and more suburban areas; and between south and north London. The level of connectivity available also varies by who is travelling, with only about one third of the London Underground network currently providing step-free access.

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

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

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

4.31 London's disadvantaged and marginalised communities suffer disproportionately from poor housing. Black, Asian and ethnic minority Londoners are more likely than others to live in homes which are poorly insulated or do not meet the Decent Homes Standard, or in buildings with unsafe cladding, as are Londoners on low incomes and with disabilities or long-term conditions. Across London, 13% of people are disabled (using the definition under the Equality Act 2010), with higher prevalence in more deprived neighbourhoods.

Key issues

- London has the most people in poverty in the UK with children the most affected including by homelessness.

- Londoners living in the most deprived areas have poorer outcomes compared with those living in the least deprived areas.
- There are imbalances in public transport connectivity across London and to those who need step free access.
- Londoners, particularly older people, experience more social isolation than people in other regions of the UK.
- Young Londoners from minority ethnicities and lower socio-economic background are more likely to have issues in accessing sports and physical activity, healthy food, and positive mental health.
- Some groups of Londoners are more likely to be concerned about crime and safety acting as a barrier to walking or using public transport, limiting people's access to activities and contributing to social isolation.
- Childcare is harder to find in London particularly in more disadvantaged areas.
- Poor housing quality in London disproportionately affects Black, Asian and ethnic minority Londoners, Londoners on low incomes, and with disabilities or long-term conditions.

Likely evolution of the baseline in the absence of the new London Plan

4.32 The absence of a new London Plan is likely to lead to increased inequalities amongst Londoners as there will be no London-wide requirement to ensure that development provides a range of measures to improve the lives of Londoners and ensure fairer more equitable access to public transport, open space and good quality housing.

4.33 Rough sleeping, overcrowded households and those living in poor quality housing could continue to increase without London-wide policy requirements to increase affordable housing provision and ensure new housing is designed to be safe and inclusive.

4.34 Without a strategic sustainable approach, new development could be located in areas of poor accessibility with limited public services, reducing opportunities to access to open spaces and use active methods of travel, leading to social isolation and decreased activity levels.

Biodiversity and ecosystem services

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

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

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

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

Key issues

- Biodiverse sites in London are threatened by a range of issues such as habitat loss, human encroachment, poor management practices and invasive species.
- Increasing access to nature has positive outcomes for wellbeing but also the potential to indirectly cause adverse effects.
- Changes in air and water quality along with a changing climate can also change distribution of species and habitats in designated sites.

- London's waterways and rivers remain polluted, limiting their ability to support biodiversity and provide much-needed spaces for recreation and wellbeing.
- Biodiversity stress can be caused by new development through noise, pollution, weather and climate, water scarcity and human disturbance. Given the level of growth required, new development can also have cumulative effects on biodiversity, green space, ecological networks and water infrastructure.
- Development linked to requirements to deliver Biodiversity Net Gain (BNG) can be associated with benefits.

Likely evolution of the baseline in the absence of the new London Plan

4.39 In the absence of a new London Plan the Conservation of Habitats and Species Regulations 2017 will continue to protect European sites through the Habitats Regulations Assessment (HRA) system.

4.40 Under the Environment Act 2021, the London Local Nature Recovery Strategy identifies the areas of London's natural environment that require the most urgent attention (biodiversity strategies) and sets out the measures needed to support nature recovery.

4.41 However, without a new London Plan, biodiversity will remain vulnerable to the effects of climate change and ongoing development, leading to further loss of both the quantity and quality of green spaces. Updated London Plan policies are needed to help mitigate climate impacts, safeguard important wildlife sites and trees, and ensure new development contributes to nature recovery – for example through tree planting and delivering biodiversity net gain.

4.42 The new London Plan will also require boroughs to designate Sites of Importance for Nature Conservation (SINCs), a non-statutory designation that provides a high level of protection within the planning system. Without this requirement, many of these sites could be at greater risk.

Best use of land and resources

4.43 The new London Plan will need to accommodate higher housing and growth targets than before, bringing forward significant additional sources of capacity for housing and economic development including consideration of Green Belt release. Pressure for development and competition between different land uses is increasing,

and without careful management could lead to unsustainable patterns of development and inefficient use of land.

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

4.45 London's aging infrastructure requires substantial investment and modernisation to meet economic growth, housing delivery, net zero and climate resilience goals. Upgrades are required across all infrastructure sectors – transport, energy, water, data infrastructure and digital connectivity. Public transport improvements are essential to enable greater densities of development while maintaining liveability. The new London Plan will need to realise opportunities to coordinate locations for growth with sustainable infrastructure connections to employment, leisure, school and community facilities. This represents a means of seeking both to reduce the need to travel, as well as encourage modal shift to sustainable travel modes.

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

Key issues

- Increased pressure for development and competing land uses with higher housing and growth targets in the new London Plan.
- Green belt release will need to be considered for additional sources of capacity.
- Competing pressures for land will impact on the ability to provide necessary social, physical, and environmental infrastructure to support the growing population.
- Upgrades are required across London's aging infrastructure to meet economic growth, housing delivery, net zero and climate resilience goals.
- Public transport improvements will be essential to support growth and encourage modal shift to sustainable travel modes.

- The number of materials and waste produced is likely to increase with increased population growth putting pressure on finite resources.
- There are opportunities from the circular economy to reduce the decarbonise supply chains, minimise waste, support the circular economy, increase recycling and manage waste sustainably.

Likely evolution of the baseline in the absence of the new London Plan

4.47 Given the scale of anticipated growth in London and the finite supply of available land, new development could result in unsustainable patterns of growth and inefficient land use without careful strategic management. The new London Plan will ensure development is focused on existing urban areas, directing growth towards Brownfield First Opportunity Areas (BFOA) and, where necessary, supporting the release of Green Belt land in a planned and co-ordinated way to accommodate future needs.

4.48 In the absence of strategic direction, development may fail to make the most efficient use of land, resulting in lower housing delivery than could be achieved in the most sustainable and well-connected locations.

4.49 High levels of growth need to be supported by adequate infrastructure. Without a co-ordinated London-wide approach to planning improvements to transport connectivity and essential utilities - including water, sewerage, digital and energy – there is a risk that capacity will not keep pace with growth. This could lead to pressures on energy and water supply and overcrowding on London's transport networks.

4.50 Waste management and meeting recycling targets will also remain a significant challenge for London. As the population grows, the number of materials and waste produced is likely to increase. While the Mayor is not a waste planning authority, the new London Plan will support a transition to a more circular economy. This approach will help London manage its consumption of finite resources.

Successful placemaking

4.51 London's built and landscape heritage provides a depth of character that has immeasurable benefit to the city's economy, culture and quality of life. London's heritage assets and historic environment make a significant contribution to the city's culture by providing easy access to the history of the city and its places. Recognition

and enhancement of the multicultural nature of much of London's heritage can help to promote community cohesion. However, the importance and significance of heritage and character can be challenged by pressure for development resulting in the loss or erosion of character or significance of landscapes, townscapes or heritage assets and related views and settings. While lack of investment can result in more heritage assets falling into the 'at risk' category, appropriate new development can secure a viable future for heritage assets currently identified as at risk.

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

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

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

Key issues

- The importance and significance of London's heritage and character can be challenged by pressure for development.

- The scale of development required to meet housing targets and other growth needs could risk the erosion of place distinctiveness.
- London's high streets and town centres accommodate 41% of all of London's businesses, providing access to a range of goods, services, social functions and cultural activities at different times of the day and night.
- There are marked contrasts in the quality and character of places across exacerbated by poor co-ordination of growth and infrastructure. Car dependence and dominance have an impact on liveability and other sustainability issues relating to health, climate change and best use of land.

Likely evolution of the baseline in the absence of the new London Plan

4.55 Development pressures in London will continue even in the absence of a new London Plan. While existing legislation - such as the Planning (Listed Buildings and Conservation Areas) Act 1990 – alongside the NPPF and Local Plans, will continue to provide a level of protection for heritage assets, London's historic environment requires a more strategic and coordinated approach. Its unique historic character, including World Heritage Sites, plays a significant role in London's identity as a world city. Without a new London Plan the protection of heritage assets may become less consistent and may fail to adequately consider their wider setting and cumulative impacts.

4.56 At a local level, heritage and character are central to creating a strong sense of place and community. An uncoordinated or poorly managed approach to development risks eroding these qualities, potentially leading to a loss of community cohesion. This can result from a lack of public spaces and community facilities, as well as development that increases reliance on private car use due to insufficient integration with public transport.

4.57 The new London Plan will provide a strategic framework to balance the delivery of growth with the protection and enhancement of local character. It's design policies, including a carefully managed approach to intensification, will help maintain quality of life and a strong sense of place within in an increasingly dense, mixed-use city.

Housing

4.58 The housing need figure of 84,884 homes per year for London set by the national government represents a significant increase from the current London Plan target of 52,000 new homes per year. There is an even bigger gap when compared

to actual delivery which was c. 32,000 in 2024-25. The current delivery environment has resulted in steep falls in housing starts, completions and planning applications. This is the result of macroeconomic factors (chiefly higher inflation and higher interest costs) that have been compounded by long-trend structural and regulatory factors.

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

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

4.61 The affordability, quality and security of housing is all key to health and an increase in the supply of social and other affordable housing is fundamental to improving health and health inequalities. Eight years after the Grenfell tragedy more than a third of high-rise buildings with unsafe cladding are yet to start remediation works; 14% of privately rented homes in London fail to meet the Decent Homes Standard, along with eight per cent of homes in the social rented sector; and 210,000 homes a year need to be made more energy efficient if London is to reach net-zero by 2030. Changing household characteristics and wider demographic trends raise housing suitability (both size and design) issues.

Key issues

- There has been a significant increase in the housing need figure for London from 52,000 to 84,884 homes per year.
- There have been steep falls in housing starts, completions and planning applications.
- Constraints on housing delivery – such as high construction costs, viability challenges, and financial pressures on providers – may limit supply.

- Affordability challenges are expected to remain acute, with mortgage rate volatility and high rents continuing to strain household budgets.
- Lack of affordable housing is holding back London's economy and potential for further growth.
- Affordability pressures exist across all tenures, and London is becoming less accessible for families with children, key workers and marginalised Londoners.
- Homelessness and temporary accommodation leads to significant human and financial costs.
- The health impact of temporary accommodation, particularly on children, is known to be substantial.
- The quality and security of housing in London is a key issue with unsafe cladding on high-rise buildings, private and social rented homes failing to meet the Decent Homes standard and 210,000 homes a year need to be made more energy efficient if London is to reach net-zero by 2030.
- Changing household characteristics and wider demographic trends raise housing suitability (both size and design) issues.

Likely evolution of the baseline in the absence of the new London Plan

4.62 Without significant intervention, housing pressures are likely to persist including a continued lack of housing choice to meet the needs of different household types and changing demographics.

4.63 The new London Plan will provide up to date evidence and clear policy guidance to support the delivery of affordable housing, helping to meet London's identified need as set out in the Strategic Housing Market Assessment (SHMA). Affordable housing targets, informed by robust viability testing, will reflect what can be realistically achieved across different parts of London. In the absence of this framework, boroughs may struggle to secure affordable housing delivery that is both viable and sufficient to meet local needs.

4.64 Without a new London Plan, there is also a risk of insufficient provision of supported and specialist housing, as well as alternative housing types such as purpose-built student accommodation and build-to-rent homes. Furthermore, as the new London Plan will establish targets for pitches and plots, its absence could result in a failure to meet the accommodation needs of Gypsy and Traveller and Travelling Showperson households across London.

4.65 Good quality design of homes is essential to improving the lives of Londoners, particularly in matters of safety and health. Without the new London Plan, developments may fail to deliver homes that are safe, inclusive and energy efficient.

Economic potential and employment

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

4.67 London's working age population is relatively highly qualified, however recent years have seen significant shifts in the supply of labour at all skill levels. While incomes are higher in London, so is income inequality. In-work poverty is a growing problem in London. There are twice as many Londoners in poverty in working households than in workless ones. A quarter of London's workforce (1.32 million people) regularly work at night (between 6pm and 6am). London's night-time economy is a key element of London's culture however music venues, creative studios, pubs and clubs that make London such a dynamic creative capital continue to be at risk.

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

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

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

Key issues

- Economic growth in London has been modest and uneven across sectors with falling productivity remaining a concern.
- While incomes are higher in London, so is income inequality with in-work poverty a growing problem.
- A quarter of London's workforce regularly work at night and London's night-time economy is a key element of London's culture however venues continue to be at risk.
- The agglomeration benefits of being based in London are a key feature of its success, however, London's infrastructure capacity constraints limit growth. Uncertainties remain about the impact of hybrid and flexible working patterns on the agglomeration of activities and infrastructure demand in London.
- The sufficient provision of employment and business space is vital to London's position as a leading global city as well as the ability of local economies to serve local populations.
- There is a need to balance supporting the needs of well-established and high growth sectors with the demand from energy-hungry services like data centres, artificial intelligence and life sciences.
- Local town centres and high streets are struggling in a changing economic context.
- Access to affordable workspace is a core challenge.
- The supply of industrial land has been decreasing.

Likely evolution of the baseline in the absence of the new London Plan

4.71 Without a new London Plan, income inequality could continue to widen due to missed opportunities to improve access to employment, skills, and training – particularly for people who are unemployed or under-represented in the labour market

4.72 A new London Plan will require boroughs to include policies that support the delivery of affordable workspace. In the absence of this strategic direction, equality of opportunity for disadvantaged and under-represented groups could be reduced, limiting their ability to access jobs and participate in the economy.

4.73 Without a new London Plan to help deliver the ambitions of the London Growth Plan and provide coordinated support for a range of sectors - including cultural and creative industries - there is a risk of negative impacts on economic growth and on London's distinct role as a leading global city.

4.74 Environmental impacts associated with economic growth, including those arising from data centres and other intensive uses, could also be exacerbated without a new London Plan to ensure appropriate mitigation measures are embedded in planning decisions.

4.75 Town centres will need to continue evolving and diversifying in response to changing retail patterns, local economic conditions and growth pressures from competing uses. In some areas new centres may need to be established to support successful placemaking. Without a strategic approach to managing London's town centre network and hierarchy, some centres may grow at the expense of others, leading to an unbalanced and unsustainable pattern of development.

4.76 A strategic approach is also essential to managing London's industrial land supply to meet the needs of businesses, services and infrastructure and to support the wider economy. In the absence of a strategic approach at a London-wide level, industrial land could be lost to higher value uses in an unplanned way, leaving some boroughs unable to meet their strategic needs.

IIA framework

4.77 A key element of the IIA process is the determination of IIA objectives. The IIA objectives have been derived from an analysis of the environmental, economic, social, health, and equalities issues identified above and were refined following consultation on the Draft IIA Scoping Report. The emerging options and policies in

the Plan will be assessed against the IIA framework, to ensure that they have positive impacts economically, environmentally, and socially including health and equalities. The objectives outlined below reflect the sustainability objectives that the London Plan should be aiming to achieve and the areas of sustainability that the London Plan is expected to affect or have an influence on.

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

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

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

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

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

4.82 The following section sets out the IIA objectives and prompt questions by IIA topic.

Topic: Best use of land and resources

IIA objective

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

Sub-objectives:

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

Strategic policy development prompt questions

Does the policy...

1. Support densification at a plot and neighbourhood level in areas that are well served or have the potential to be so, by transport and other existing infrastructure?
2. Promote the re-use of previously developed land?
3. Likely require the use of greenfield land?
4. Promote waste management practices in line with the waste hierarchy and support net self-sufficiency?
5. Minimise the use of resources in construction and operation?
6. Ensure the protection of soil resources and quality during construction activities?
7. Protect ground and surface water quality (and the availability of water resources for humans and nature) in line with Water Framework Directive (WFD) requirements?

8. Protect and enhance green and blue infrastructure contributing to mitigation services?
9. Risk exacerbating the impact of wind in the public realm?
10. Promote the remediation of contaminated land and/or restoration of degraded soils?
11. Promote supply and sustainable use of mineral resources?
12. Protect the network of sites safeguarded for waterborne freight use across the capital?
13. Promote supply of burial space to meet the needs of different communities?

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

Strategic spatial options questions

Will development in this broad location/this spatial option...

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

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

Topic: Housing

IIA objective

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

Sub-objectives:

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

Strategic policy development prompt questions

Does the policy...

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

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

Strategic spatial options questions

Will development in this broad location/this spatial option...

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

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

Topic: Economic potential

IIA objective

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

Sub-objectives:

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

Strategic policy development prompt questions

Does the policy...

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

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

Strategic spatial options questions

Will development in this broad location/this spatial option...

1. Retain well-located industrial land or other land that meets specific business-related needs?
2. Avoid the loss or other disruptive impact on employment floorspace or land currently in use by businesses?
3. Provide the opportunity for a variety of businesses to [better] meet their needs or improve [e.g. energy] efficiency?

4. Provide the opportunity to deliver housing that better meets specific workforce or consumer needs?
5. Provide new opportunities for employment-generating activity e.g. by way of new customers or spaces attractive to growth sectors?
6. Have good access to or improve access to jobs or training facilities?
7. Provide the opportunity to address infrastructure constraints on growth or resilience?
8. Support innovation in the facilities to be provided or challenges to be overcome?
9. Support regeneration in areas experiencing the effects of economic change?
10. Help futureproof an area to economic change in use and economic diversification and flexibility of spaces?

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

Topic: Successful placemaking

IIA objective

4. Create successful, well served, mixed use and dynamic places, ensuring new development promotes and enhances sense of place, having regard for the specific vulnerabilities of the landscape.

Sub-objectives:

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

Strategic policy development prompt questions

Does the policy...

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

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

Strategic spatial options questions

Will development in this broad location/this spatial option...

1. Provide the opportunity to diversify the mix of uses and facilities in the area?
2. Provide the opportunity to integrate transport and land uses?
3. Provide the opportunity to enhance access (and where relevant address deficiencies in) to infrastructure and open space in the area through its scale, density and location?
4. Provide the opportunity to create new character and distinctiveness where this is currently lacking?
5. Ensure that utilities / digital infrastructure can support and enable the anticipated scale and spatial distribution of development?
6. Provide the opportunity to integrate with existing neighbourhoods/settlements without undermining their distinctiveness?

7. Conserve tranquil areas free from visual intrusion, noise, light pollution etc?
8. Protect rights of way, common land, open spaces, views etc where they contribute to local character?

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

Topic: Health and community safety

IIA objective

5. Improve the health, community safety and wellbeing of Londoners and reduce health inequalities

Sub-objectives:

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

Strategic policy development prompt questions

Does the policy...

1. Risk increasing air or noise pollution through an increase in emissions-generating activity (transport, economic, incineration, construction)?
2. Risk increasing air pollution, CO₂ emissions, and road danger through an increase in private vehicle use?
3. Risk increasing exposure to air pollution, particularly in areas of poorest air quality and through being likely to require development in AQMAs?
4. Help tackle congestion and other causes of poor air quality?

5. Minimise the risk of disturbance (noise, vibration, light dust) during construction and operation?
6. Enhance connectivity between communities?
7. Promote design that supports active travel and recreation, including through improving safety and perceptions of safety?
8. Promote design that incorporates and provides better connectivity and access to natural greenspace?
9. Risk increasing pressure on healthcare capacity?
10. Ensure sufficient and equitable access to healthcare?
11. Promote improved access to social and community facilities, including opportunities for social interaction, for the neighbourhood?
12. Promote access to sports facilities that contribute to health and wellbeing?
13. Promote design which enhances safety (including fire safety) and feelings of security in respect of buildings, infrastructure and public realm?

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

Strategic spatial options questions

Will development in this broad location/this spatial option...

1. Be likely to increase problematic air and/or noise pollution arising from traffic and operations?
2. Have good access or present opportunities to improve access to areas free from traffic and rail noise
3. Present opportunities to reduce exposure to air pollution and noise and vibration, including for vulnerable people and communities?
4. Present opportunities to improve access to and safety of travel networks and the public realm?
5. Involve the (qualitative or quantitative) net loss of active recreational facilities?

6. Have good access to or present opportunities to improve access to and safety of active recreational facilities/opportunities?
7. Have good access or present opportunities to improve access to and connectivity of natural green space?
8. Have good access to or present opportunities to improve access to healthy food?
9. Have good access or present opportunities to improve access to health and social care facilities?
10. Have good or present opportunities to improve connectivity between communities and to key facilities?
11. Have good access or present opportunities to improve access to other social infrastructure including places of social interaction?
12. Provide the opportunity to integrate with existing housing, promoting social mixing and community cohesion?

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

Topic: Equality of opportunity

IIA objective

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

Sub-objectives:

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

Strategic policy development prompt questions

Does the policy...

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

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

Strategic spatial options questions

Will development in this broad location/this spatial option...

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

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

Topic: Climate change

IIA objective

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

Sub-objectives:

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

Strategic policy development prompt questions**Does the policy...**

1. Risk increasing emissions through loss or damage to carbon sinks, likely use of carbon intensive construction materials and processes, operation and/or resultant behaviours such as increased traffic?
2. Support the creation of new carbon sinks or restoration of existing carbon sinks such as soils?
3. Support active, efficient and sustainable modes of travel that reduce emissions?
4. Support low carbon circular economy growth sectors (including e.g. CCS) by meeting their spatial needs or helping to grow their markets?
5. Promote the use or generation of renewable and low carbon energy?
6. Encourage reduction in energy use and promote energy efficiency and low carbon operations?
7. Promote low carbon construction including circular economy principles and reuse of carbon intensive materials?
8. Risk increasing surface water flood risk through being likely to require the development of permeable land?
9. Promote SuDS and catchment management approaches including design and provision of appropriate greenfield run off and functional floodplain where loss of these is unavoidable?
10. Risk increasing vulnerability to flood risk by being likely to increase net development in areas of known flood risk?
11. Direct development to areas of least flood risk?
12. Support the delivery of strategic flood risk infrastructure?
13. Risk exacerbating urban heat island by an increase in the net built up area?
14. Promote building, infrastructure and public realm design that is resilient to likely extremes of temperature, rainfall and wind and mitigates wind and heat issues caused by development?

15. Promote design that improves the climate resilience of a wider area beyond the development site?
16. Strengthen the natural environment, including protecting and enhancing existing green infrastructure and introducing new natural spaces and green features in urban areas and buildings?

See also questions under objective 8 (biodiversity).

Strategic spatial options questions

Will development in this broad location/this spatial option...

1. Likely involve a reduction of CO₂e emissions-intensive activity (intensive agriculture, artificially maintained grass)?
2. Present opportunities to create new carbon sinks or enhance the effectiveness of existing sinks?
3. Present opportunities to reuse embodied carbon (reuse of buildings/structures or materials)?
4. Need significant additional (embodied) carbon intensive infrastructure (roads, flood defences, rail, buildings) needed to connect and accommodate growth in this broad location?
5. Be well connected by public transport or capable of being so from committed schemes?
6. Be accessible by sustainable modes to/from a range of destinations reflecting work and life needs?
7. Present the opportunity to improve the access by sustainable modes for a wider area?
8. Present opportunities to harness or connect to efficient and resilient local zero carbon heat or power sources in this location e.g. heat networks?
9. Avoid areas of flood risk including functional floodplain and catchment storage?
10. Present the opportunity to reduce flood risk to existing development?
11. Present the opportunity to improve the resilience of the wider area to extremes of heat or wind?

See also questions under objective 8 (biodiversity).

Topic: Biodiversity and geodiversity

IIA objective

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

Sub-objectives:

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

Strategic policy development prompt questions

Does the policy...

1. Protect the physical integrity of designated biodiversity and geodiversity sites including sites of international, national and local importance, including those of potential or candidate designation?
2. Help manage other pressures on designated sites and protected habitat and species, taking on board the HRA findings and recommendations?
3. Promote the conservation and enhancement of London's Nature Recovery Network and priority habitat and species, including through habitat creation and restoration, linked with existing habitats?
4. Conserve and enhance the connectivity and functionality of the green and blue infrastructure network?

5. Support the provision of biodiversity net gain that provides wider ecosystem services benefits, including access to nature?
6. Risk an increase of disturbance from human activity in the vicinity of habitats and species?
7. Provide opportunities to create new and enhance existing wildlife and geological sites?
8. Ensure access to green infrastructure providing opportunities for recreation, amenity and tranquillity?

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

Strategic spatial options questions

Will development in this broad location/this spatial option...

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

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

Topic: Historic environment

IIA objective

9. To conserve and enhance assets of historical and archaeological importance and their settings.

Sub-objectives:

- 9a. Conserve and enhance designated and non-designated heritage assets and their settings?
- 9b. Conserve and enhance features and areas of historical archaeological or architectural importance and their settings?
- 9c. Support the conservation, management and enhancement of at-risk heritage assets?

Strategic policy development prompt questions

Does the policy...

1. Support the conservation and enhancement, and enjoyment (access, affordability, interpretation, understanding) of heritage assets, appropriately managing risks to their significance, including as a result of development in their settings?
2. Promote greater understanding of London's historic environment, including through improved participation in cultural activities?
3. Help foster heritage-led regeneration?
4. Bring heritage assets back into appropriate use, particularly heritage assets at risk?
5. Integrate climate change mitigation and adaptation measures into the historic environment successfully and sensitively?
6. Protect waterfront areas at risk from the effects of climate change related events, including flooding from the sea?

Strategic spatial options questions

Will development in this broad location/this spatial option...

1. Protect, enhance and better reveal the significance of designated and non-designated heritage assets, avoiding or minimising harm arising from insensitive development of the asset itself or within its setting; protect key views or affect the ability to implement a relevant management plan?
2. Present the opportunity to improve the condition of, access to and/or enjoyment of heritage assets?

Chapter 5

Integrated Impact Assessment findings for the spatial strategy options

5.1 This chapter presents the findings of the IIA of the overall spatial strategy options considered by the GLA when deciding on the overall spatial strategy for the London Plan (set out in Policy MBUL1 Spatial Strategy).

Spatial strategy options considered

5.2 The options for the spatial strategy comprise a number of ‘building blocks’ or sources of supply, which are locations within Greater London that could be redeveloped or newly developed to accommodate the new homes and employment land that the London Plan needs to deliver, i.e.:

- Brownfield large sites
- Small sites
- Industrial land – release of some SIL/LSIS and non-designated land for residential use
- Green Belt Industrial Broad Locations for Growth (BLGs)
- Green Belt Residential BLGs around existing transport connections with some assumed enhancements
- Green Belt Residential BLGs around potential future transport connections

5.3 The process undertaken by the GLA for identifying the capacity each of these sources of supply could deliver in terms of new residential, mixed use or industrial growth is outlined in **Chapter 2** (see Stage B of the methodology).

5.4 Given there were potential choices to be made between the BLGs in the Green Belt for the overall spatial strategy, each of the Residential and Industrial BLGs were considered to be reasonable alternatives for locating some of the residential and employment growth needed. The IIA effects identified for each BLG are presented in **Appendix F**. The assessment of the reasonable alternative BLGs (through the GLA’s own studies, the IIA and the HRA) helps to inform the development of the overall spatial strategy by:

- Enabling comparison between the BLGs, to help with discounting some in the case any were not needed, and also to determine whether any of the BLGs

would have such significant negative effects as to warrant exclusion from the strategy.

- Highlighting where the London Plan needed strong policies to ensure positive impacts and manage negative effects.
- For the 20-year Residential BLGs (future candidate BLGs) helping to highlight what further investigation needs to be done to make them acceptable.

5.5 It is important to appraise the BLGs in a consistent manner, therefore the IIA used specifically defined criteria for determining significant versus minor effects (as set out in **Appendix E**). However, it should be noted that there are not substantial differences in IIA effects between the BLGs as presented in **Appendix F**. This is a limitation of such a strategic assessment as is required for the scale of the London Plan. In addition, the development of all the BLGs is conceptual at this stage and subject to the same assumptions in terms of density, scale of services and facilities and accessible green space etc. that would be provided, which means they generally received the same types of effects as each other. Some differences were noted where there were variations in the BLGs:

- Extent within higher quality agricultural land
- Proximity to Minerals Safeguarding Areas
- Extent within Source Protection Zones
- Proximity to waterbodies
- Extent within protected vistas
- Levels of noise pollution
- Proximity to heat network zones
- Proximity to international and national biodiversity and geodiversity assets

5.6 Given the approach to identifying suitable capacity (as outlined in **Chapter 2**) which pre-emptively anticipated many environmental effects, no BLGs were identified for exclusion at this stage. However, the HRA work identified that one residential-led BLG had inadvertently incorporated land included within an existing mitigation strategy, so this land was then excluded from the 10-year capacity, pending investigation of whether suitable alternatives could be found.

5.7 The six overall spatial strategy options considered by the GLA and the approximate amount of development the different sources of supply would help to deliver in each option are listed below:

- Option 1 – Urban intensification (delivers approximately 500-560k homes)

- Option 2 – More intensification plus Green Belt release (delivers approximately 560-650k homes)
- Option 2A – More intensification plus NPPF-led Grey Belt development (delivers approximately 560-600k homes)
- Option 3 – Further Green Belt release associated with major new transport investment (delivers approximately 650-700k homes)
- Option 4A – Meeting 850k in 10 years – huge step change in investment and delivery capacity (delivers 850k homes)
- Option 4B – Meeting 850k over longer time frame (delivers 850k homes)

5.8 In considering how to compile over-arching spatial strategy options, for residential-led capacity, the findings of the individual BLG IIA in **Appendix F** were not a deciding factor given the need to maximise deliverable housing capacity in those options where green belt land is included. It is important to note that while Green Belt locations within Option 4B have been identified for growth option appraisal purposes, these all have high degrees of uncertainty around them given transport investment needed and other strategic mitigations work to make them suitable. For deciding which of the industrial Green Belt BLGs to include, two approaches were used:

- The first approach in Option 1, focused on a minimal number of at least one BLG per Property Market Area (assuming full build out of scoped capacity at high intensity) to meet the identified needs, and hence the primary consideration was overall capacity.
- The second approach reflected in Option 2, 2A and 3 used a multi-criteria assessment. This included consideration of proximity to international biodiversity assets as a priority weighted criterion that resulted in two locations being put into the longer-term potential pot in Option 4B.

5.9 As shown above, Options 1, 2, 2A and 3 would not identify sufficient locations to meet the full standard method housing requirement of c. 850,000 homes within the 10-year period of the new London Plan. These options are still considered to be reasonable alternatives for appraisal in the IIA as they are consistent with the overall plan objectives, notably making best use of land, in that they seek to maximise urban intensification on large and small brownfield sites and release industrial land first before then considering well-connected sustainable locations for Green Belt release. Option 2A considers grey belt development that might come forward speculatively, rather than around well connected (by public transport) locations in the Green Belt. This is helpful as a counterfactual that is arguably consistent with national policy in the absence of an up-to-date plan. In contrast, option 4A is not considered a reasonable alternative as it is not plausibly achievable (given historic housing

delivery maximum of 44,000 per annum and current delivery lows, plus lead in times for major transport investment and associated housing uplifts) which would immediately put a plan-led approach at risk, meaning it would not be consistent with realising plan objectives.

5.10 The assumptions relating to development within the different sources of supply for all of the spatial strategy options are listed below.

Option 1 – Urban intensification

- Brownfield large sites:
 - Maximise density / heights.
 - Maximise use of existing infrastructure (stations, town centres etc.).
 - Town centres, Opportunity Areas, shortlisted New Town at Thamesmead (with extra support).
 - Development will be less in less viable locations (generally beyond zone 2).
- Small sites:
 - Minimum densities / heights in London Plan.
 - Delivery mechanisms e.g. London wide design code support minor uplift in delivery rate from all sources.
- Industrial land – release of some SIL/LSIS:
 - Minimal due to plan position of no let loss being maintained.
 - Intensification & some plan-led release.
- Green Belt Industrial BLGs:
 - 6 BLGs: M40 (Northolt area), M1 (Borehamwood West area), M25/A10 (Northern Lea Valley area), A127 (Upminster area), M25 south (South Chessington area) M4 (Heathrow area), (to meet additional logistics need that cannot be met within urban London due to prioritisation of housing, assumed highest land use efficiency so less land needed) plus grey belt where suitable for data centres.
- Green Belt Residential BLGs around existing transport connections:
 - N/A – Limited to growth that is allowed speculatively by the NPPF/any interim Local Plan positions (e.g. Enfield new Local Plan if found sound and adopted).
- Green Belt Residential BLGs around potential future transport connections:

- N/A
- Transport infrastructure:
 - DLR in Thamesmead.

Option 2 – More intensification plus Green Belt release

- Brownfield large sites:
 - Existing allocations and new large sites re-planned at densities aligned with transport connectivity.
 - More development comes forward at less viable locations.
- Small sites:
 - Further concerted action on small sites, may need direct delivery/delivery support in addition to positive planning across greater range of typologies (e.g. more sensitive stock due to heritage setting, existing residential use).
- Industrial land – release of some SIL/LSIS:
 - Intensification and extra plan-led release, moderated to account for more irreplaceable types of land/location and to account for absorbable rates of loss by property market area.
- Green Belt Industrial BLGs:
 - 9 BLGs (all excluding M25 north (Potters Bar area) and A1 Borehamwood East) to give more market choice/ensure at least one per property market area/accept that best land use efficiencies not always achieved plus additional scale needed to offset release; plus, grey belt where suitable for data centres.
- Green Belt Residential BLGs around existing transport connections:
 - Targeted Green Belt release at densities that change existing market norms (10 BLGs).
 - Employment compatible with residential also allowed for. May include data centres.
- Green Belt Residential BLGs around potential future transport connections:
 - N/A
- Transport infrastructure:
 - Transport mitigations funding – to bring forward upgrades to deal with crowding.

Option 2A – More intensification plus Grey Belt

- Brownfield large sites:
 - Same as Option 2.
- Small sites:
 - Same as Option 2.
- Industrial land – release of some SIL/LSIS:
 - Same as Option 2.
- Green Belt Industrial BLGs:
 - Same as Option 2.
- Green Belt Residential BLGs around existing transport connections:
 - Only at Crews Hill (Enfield shortlisted New Town) (critical mass of homes plus employment compatible with residential) plus dispersed grey belt development only (not necessarily well-related to transport connections). Smaller scale than in Option 2.
- Green Belt Residential BLGs around potential future transport connections:
 - N/A
- Transport infrastructure:
 - N/A

Option 3 – Further Green Belt release associated with major new transport investment

- Brownfield large sites:
 - Large site delivery and density boost ahead of transport scheme completion.
- Small sites:
 - Additional small sites delivery boost (further typologies positively planned for by design code etc.) linked to value/density uplifts associated with priority schemes.
- Industrial land – release of some SIL/LSIS:
 - Additional industrial release linked to transport schemes including Bakerloo Line Extension and West London Orbital and higher uplift in well-connected locations.

- Green Belt Industrial BLGs:
 - All 11 BLGs to give market choice, plus increase in scale to enable re-provision to offset release locations.
- Green Belt Residential BLGs around existing transport connections:
 - Additional GB release at Enfield shortlisted New Town (Crews Hill), Upminster, Mill Hill & Barnet, West Ruislip.
 - Employment compatible with residential also allowed for. May include data centres.
- Green Belt Residential BLGs around potential future transport connections:
 - Additional GB release linked to bus-based transport connectivity improvements (no extra BLGs, but four are affected including the shortlisted New Town (Crews Hill) plus Upminster, Mill Hill & Barnet and West Ruislip.
- Transport infrastructure:
 - Commitment to priority transport schemes (West London Orbital, Bakerloo Line Extension, Metroisation etc) plus additional connectivity in the GB (bus based).

Option 4A – Meeting 850k in 10 years

5.11 Options 4A and 4B would in theory both meet the full housing need as assessed by the standard method, either in 10 years or an extended plan period of 20 years. However, the GLA has determined that delivering the significant scale of growth required under Option 4A within 10 years is unachievable mainly due to the implausible step up of overall delivery assumed including of mitigating infrastructure (such as transport connections). This level of housing delivery far exceeds anything achieved in recent times and would start from a position of unprecedented low delivery. Given the high risk of failure, this could mean growth without necessary mitigation due to required infrastructure not keeping pace. In order to maximise chances of delivery, it would also require loosening of plan-led approaches which would also likely result in unmitigated growth and other adverse impacts such as on economic functionality (e.g. due to high rates of uncoordinated industrial land release). Or given national policy that penalises ‘under-delivery’ against a target, it could very easily result in loss of a plan-led approach undermining the ability to achieve the plan’s objectives (and mitigation of adverse impacts) in the round.

5.12 For these reasons, Option 4A was discounted by the GLA as not being a reasonable alternative and has not been subject to IIA.

Option 4B – Meeting 850k over longer time frame

- Brownfield large sites:
 - Additional brownfield opportunity is found / later phases of existing large sites deliver / transport makes further delivery viable.
 - Delivery rates continue to increase.
- Small sites:
 - Delivery rates continue to increase and are sustained at a high level over a longer period (partly a rolled forward annual delivery rate).
- Industrial land – release of some SIL/LSIS:
 - Next tranche of plan-led release likely to be mix of that in Option 3 and more SIL, as LSIS and undesignated industrial land used up.
- Green Belt Industrial BLGs:
 - Same as Option 3 but continue to grow to meet longer term needs and offset release.
- Green Belt Residential BLGs around existing transport connections:
 - All 10-year Residential BLGs delivered over 15 or 20 years depending on what pace of delivery is achieved.
 - Employment compatible with residential also allowed for.
- Green Belt Residential BLGs around potential future transport connections:
 - Additional Green Belt opportunity opened up by potential further transport investment.
- Transport infrastructure:
 - Delivery of Crossrail 2 committed.
 - Additional strategic transport investment in a further four Green Belt locations.
 - Major transport mitigations – upgrade of existing lines (e.g. Northern, Jubilee Line etc.).

Appraisal of the spatial strategy options

5.13 The likely effects of the five reasonable alternative spatial strategy options are presented in **Table 5.1** and described below by IIA objective.

Table 5.1: Likely IIA effects of the spatial strategy options

IIA objective	Option 1 – Urban intensification	Option 2 – More intensification plus Green Belt release	Option 2A – More intensification plus Grey Belt	Option 3 – Further Green Belt release	Option 4B – Meeting 850k over longer time frame
IIA1: Best use of land and resources	++/-	++/-	++/--	++/-	++/--
IIA2: Housing	+/-	+/-	--/+	++/-	++
IIA3: Economic potential	+	++	++	++	++
IIA4: Successful placemaking	+/-?	++/-?	--?/+	++/-?	++/--?
IIA5: Health and community safety	+/-?	++/-?	--?/+	++/-?	++/-?
IIA6: Equality of opportunity	+	++	+	++	++
IIA7: Climate change	++/-?	++/-?	++/--?	++/-?	++/-?
IIA8: Biodiversity and geodiversity	+/-?	--?/+	--?	--?/+	--?/+
IIA9: Historic environment	--?	--?	--?	--?	--?

IIA objective 1: Best use of land and resources

5.14 All of the spatial strategy options prioritise the largest proportion of housing and employment growth on brownfield land, with significant urban intensification at high densities, which is a more efficient use of land than greenfield development. The level of growth on brownfield land increases from Option 1 to 4B but given the overall scale of increased homes and employment land is high in all options, they are all expected to have a significant positive effect in relation to IIA objective 1: Best use of land and resources. However, all the options would also require development of some greenfield land in the Green Belt and therefore they would also have a negative effect in relation to this objective, due to the loss of greenfield land, some of which is on higher grade agricultural land and/or within Mineral Safeguarding Areas (albeit minerals could be extracted prior to development occurring if needed).

5.15 All of the options include between 6 and 11 Green Belt industrial BLGs mainly in the west, north and east (apart from the M25 south (South Chessington area) in all options except Option 1). Options 2, 3 and 4B would also release Green Belt at a number of residential BLGs in locations associated with existing, planned or plausible transport infrastructure upgrades and some new investment mostly in the northwest and east, with the largest area of land released under Option 4B (albeit over a 20-year period). Based on the case study precedents the GLA reviewed, the residential BLGs are assumed to be developed at higher densities (e.g. 90-160 dwellings per hectare) than is usually proposed on greenfield sites by the house building industry. This would be a more efficient use of land and resources, creating a critical mass to ensure these are viable places to service with further transport and infrastructure investment. Option 2A would also result in greenfield land development but in a more piecemeal and fragmented way as it would depend on speculative proposals coming forward on land with potential to be identified as grey belt. These are assumed to be at the more usual greenfield development densities of 20-50dph, which would ultimately require more land take to deliver the same number of homes. For this reason, and due to the highest amount of BLGs in Option 4B, Options 2A and 4B are expected to have significant negative effects mixed with the significant positive effect in relation to IIA objective 1: Best use of land and resources.

IIA objective 2: Housing

5.16 While all of the spatial strategy options would deliver a significant amount and mix of new homes across London, as Options 1, 2 and 2A fall short (by approximately 25-45%) of the full standard method assessed need of 850,000 homes they are expected to have a mixed minor positive and minor negative effect in relation to IIA objective 2: Housing. Due to Option 2A relying on speculative

proposals coming forward on land with potential to be identified as grey belt, which would also be more likely to be lower density and may contain less of a mix of housing type and affordable units, its negative effect is expected to be significant. Option 3 could deliver closer to 80% of the full requirement therefore its effect is expected to be significant positive mixed with a minor negative effect for not fully meeting the objectively assessed need. As Option 4B would deliver the full need (albeit over a 20-year period) and at higher densities that would achieve the full range of housing mix and affordable units, it is expected to have a significant positive effect in relation to IIA objective 2: Housing.

IIA objective 3: Economic potential

5.17 All of the spatial strategy options are likely to have a positive effect on unlocking and sustaining London's economic potential across all parts of the capital as they would retain important existing employment land in the Central Activity Zone while also providing new industrial land at the BLGs which are well-located around junctions of the Strategic Road Network. This ensures good strategic freight access to meet increased logistics needs. All the options would therefore contribute to providing space for a diversity of economic activity to meet specific needs, including current increased requirements for distribution and storage and data centres. However, as Option 1 would only provide six additional Industrial BLGs in the Green Belt while the other options would provide 9 or 11, Option 1 is considered to have a minor positive effect, and the other four options would have a significant positive effect on IIA objective 3: Economic potential.

IIA objective 4: Successful placemaking

5.18 All of the spatial strategy options are considered likely to have at least a minor positive effect on helping to create well-served mixed use places, particularly in the existing built-up area of London. Options 2, 3 and 4B would also be likely to create successful new communities at the Green Belt residential BLGs, which are well-located to public transport and due to the assumption that they will all provide at least 3,000 new homes and deliver associated services and facilities as well as accessible green space. Therefore, these three options are expected to have a significant positive effect in relation to IIA objective 4: Successful placemaking. Option 1 would not deliver any new communities at residential BLGs, and Option 2A would be less likely to provide the scale of development needed to create well-served mixed-use places due to relying on speculative proposals coming forward on land with potential to be identified as grey belt. Therefore, these two options would only have a minor positive effect in relation to IIA objective 4: Successful placemaking.

5.19 However, due to the scale of development proposed under all of the options there could also be some negative effects on existing townscapes, place-based assets and protected vistas. It is likely that development at all the Green Belt residential BLGs, or in grey belt locations would have adverse effects on the character and sensitivity of the landscape, particularly if they fall within important views. Eastern Hainault Loop, Croydon-New Addington and Northwood BLGs which would be developed under Options 2, 3 and 4B, all fall within protected vistas. Option 2A could result in more piecemeal development in the Green Belt all around the outer parts of Greater London, some of which could also fall within protected vistas. Therefore, due to the larger scale of development under Option 4B, and the wider extent of potential greenfield development under Option 2A, these two options are considered to have a significant negative effect as well as the positive effect in relation to IIA objective 4: Successful placemaking, which Options 1, 2 and 3 would be expected to have a minor significant effect mixed with the positive effects identified above. The negative effects are uncertain for all of the options as they could be mitigated through good quality, landscape-led design of new developments in the BLGs or on grey belt land, but these are unknown until future proposals come forward.

IIA objective 5: Health and community safety

5.20 Improvements to health, well-being and community safety could be achieved through all of the spatial strategy options due to the scale of additional growth provided that sufficient additional strategic healthcare, emergency services and criminal justice infrastructure is also delivered, along with improvements to public realm, creation or enhancement of accessible green space and opportunities for active travel to access daily services and facilities. If well planned, using landscape-led design, the Green Belt residential BLGs should help realise strategic opportunities for nature recovery, enhanced access to green space and cleaner, healthier waterways, all of which contribute to people's physical and mental health and wellbeing. Therefore, due to Option 1 having residential BLGs and Option 2 having less of the critical mass required to help support provision of new supporting facilities (due to speculative proposals on grey belt land), these two options are expected to have minor positive effects on IIA objective 5: Health and community safety. Options 2, 3 and 4B are considered likely to have a significant positive effect due to the scale of Green Belt residential BLG development in these options.

5.21 However, the increased density of new development across London could potentially give rise to negative effects on health related to air quality, light and noise, and one of the Green Belt residential BLGs (East of Ickenham) is partly within an area that experiences higher road and rail noise pollution. Therefore, all options are

expected to have at least a minor negative effect in relation to IIA objective 5: Health and community safety as well, with Option 2A's effect expected to be significant negative due to the more piecemeal development associated with speculative proposals on land with potential to be identified as grey belt. This could occur all around the outer parts of London and may be more likely to be in areas affected by road, rail or aircraft noise. All of the negative effects are uncertain as they will depend on the specific locations, design and layout of new developments.

IIA objective 6: Equality of opportunity

5.22 All of the spatial strategy options have potential to help meet the diverse needs of Londoners and promote greater equality of opportunity. The scale of new housing and employment development to be delivered and the focus on intensification of the existing built-up area, could help to promote greater connectivity and inclusivity, and be achieved in a way that contributes to meeting London's different needs.

Therefore, all of the options are expected to have at least a minor positive effect in relation to IIA objective 6: Equality of opportunity. Development of the Green Belt residential BLGs in Options 2, 3 and 4B would also ensure a good mix of housing types and provision of affordable housing that is well-located to public transport opportunities. This should also help to reduce existing inequalities, and therefore these options are expected to have a significant positive effect.

IIA objective 7: Climate change

5.23 Given the brownfield first focus in all of the spatial strategy options, they are all expected to have a significant positive effect in relation to IIA objective 7: Climate change as they will all contribute to reducing transport-related emissions due to providing homes close to existing employment, services and facilities within the existing built-up areas in London. In addition, Options 2, 3 and 4B focus new, higher density development in the Green Belt at BLGs in locations with good sustainable transport accessibility to central London, and at a scale large enough to provide services and facilities to support reduced car travel within the new communities themselves.

5.24 However, increased density in the existing built-up area could also exacerbate climate change risks such as urban heat island effects and surface water flooding if not accompanied by climate-resilient design measures, therefore Option 1's significant positive effect is mixed with an uncertain minor negative effect for IIA objective 7: Climate change. Similarly, development in the Green Belt BLGs could increase impermeable surfaces and contribute to surface water flooding, although the assumption is that they would be landscape-led design with green infrastructure and

sustainable drainage systems incorporated. The identification of the Green Belt residential BLGs by the GLA excluded any areas of high risk of fluvial or surface water flooding from the capacity estimates, meaning those areas could be avoided, and some of the residential BLGs are located within or close to zones identified in the latest National Zoning Model where heat networks are likely to provide the lowest cost option for decarbonising heat. Therefore, due to containing most or all of the Green Belt residential BLGs, Options 2, 3 and 4B are considered likely to have minor negative but uncertain effects as well, as their climate resilience will depend on final design, layout and incorporation of green infrastructure, SuDS and/or heat networks within the BLGs, in addition to including brownfield development in the built up area. Option 2A is expected to have an uncertain significant negative effect in this regard due to the higher likelihood of speculative, lower density, car-dependent housing development on fragmented areas of grey belt that may not incorporate green infrastructure or SuDS and would be less likely to have the critical mass to connect to heat networks.

IIA objective 8: Biodiversity and geodiversity

5.25 The prioritisation of brownfield intensification within all of the spatial strategy options will reduce pressure on greenfield land, designated sites and protected habitats, although it is noted that numerous designated biodiversity sites and SINCs occur in the built-up area as well (while noting the more irreplaceable are excluded from capacity assumptions in brownfield SHLAA methodology). Options 2, 3 and 4B also allow for targeted greenfield development within the identified Green Belt BLGs which could result in some loss of biodiversity, although this is uncertain as it depends on how the BLGs are designed and developed. Both Northwood and West Ruislip 10-year residential BLGs are within 250m of Ruislip Woods SSSI and three of the 10-year residential BLGs (East of Ickenham, Croydon-New Addington and Upminster) are within 250-1,000m of an internationally or nationally designated site, therefore have some potential to cause direct or indirect adverse effects to these protected areas. All of the 10-year Green Belt residential BLGs also overlap with at least one locally designated site, ancient woodland or priority habitat. It is therefore considered likely that Options 2, 3 and 4B could result in significant negative effects. However, this is uncertain as there may be opportunities to promote biodiversity or habitat connectivity if new developments incorporate green infrastructure. These options could also have minor positive effects as the assumptions by the GLA in identifying the BLGs were that they would be of a sufficient scale to enable green infrastructure and nature recovery opportunities in line with the LNRS to be incorporated.

5.26 Options 1 and 2A would be less likely to result in these larger scale nature recovery opportunities which are primarily Green Belt based, as Option 1 does not include Green Belt residential BLGs and Option 2A in the Green Belt would rely on speculative proposals coming forward at smaller more widespread locations. This piecemeal greenfield development under Option 2A could also have significant negative effects if it contains or is in proximity to international or nationally designated sites. Therefore, Option 1 is expected to have a minor negative but uncertain effect and Option 2A a significant negative but uncertain effect in relation to IIA 8: Biodiversity and geodiversity, while Options 2, 3 and 4B are considered likely to have mixed minor positive and uncertain significant negative effects.

IIA objective 9: Historic environment

5.27 The scale and intensification of growth within the existing built-up area under all of the spatial strategy options could create opportunities to conserve and enhance London's distinctive heritage assets and their settings but if not managed carefully, could also put pressure on them. In addition, the 10 and 20-year Green Belt residential BLGs in Options 2, 3 and 4B all contain heritage assets, overlapping a combination of archaeological priority areas, conservation areas and registered parks and gardens. Speculative development proposed on land that could be identified as grey belt under Option 2A also has the potential to contain heritage assets and/or harm the setting of them. Therefore, all of the spatial strategy options are considered likely to have a significant negative effect in relation to IIA objective 9: Historic environment, with some uncertainty as it will depend on final design and layout of new development.

Conclusion and preferred spatial strategy option

5.28 Given the significant increase in housing and employment development that would be delivered through all of the spatial strategy options, they are all considered likely to have a mix of positive and negative sustainability effects. Similarly, as they all comprise a large portion of brownfield intensification of the existing built-up area, they have a number of similar effects. The differences arise due to the increasing scale of growth that would be delivered between Options 1 and 4B, as well as the fact that Option 1 would only involve very limited development in the Green Belt. In addition, while Option 2A would result in greenfield development within the Green Belt, it would not for the most part be targeted to the identified residential BLGs which are well-located around existing and potential future public transport stations. Instead, it would be more scattered and likely smaller scale, low density on parcels of land that have potential to be identified as grey belt.

5.29 Therefore, Option 1 has the least potential for significant positive or negative effects. Option 2A is considered likely to have the most significant negative effects, in relation to almost all of the IIA objectives (except IIA objective 2: Economic potential and IIA objective 6: Equality of opportunity for which it has positive effects relating to the brownfield intensification that all of the options include, as well as delivery of additional industrial land at some of the BLGs in the Green Belt). Options 2, 3 and 4B have more positive effects overall than Options 1 and 2A. Option 3 has slightly more potential for significant positive effects than Option 2 as it would get closer to delivering the standard method requirement for housing. Option 4B has the same potential for significant positive effects as Option 3, but slightly more significant negative effects because it has the highest amount of new housing to be delivered (albeit over 20 years not 10) and therefore would result in the highest intensification in the urban area, plus the largest extent of greenfield development in the Green Belt.

5.30 However, many of the potential negative effects identified are uncertain because they will depend on the way in which the new development is delivered. This will be determined by the requirements within the development management related policies in the draft London Plan and policies (development management and site allocations) contained in relevant Local Plans. As the appraisal of the draft policies explains, many of those effects, (and those likewise identified in the individual Green Belt BLG IIA findings in **Appendix F**) are anticipated and proactively addressed by the full suite of policies drafted for the London Plan which will operate alongside the NPPF.

Outline of reasons for selecting preferred option

5.31 The preferred growth option selected is mostly aligned with Option 2 while reflecting some of the spatial aspects of Option 3. This is notably in relation to Green Belt, as related transport interventions were reviewed and agreed to be more deliverable and/or committed than major schemes in the urban area within 10 years. This meant wider station buffers could be applied (the definition of certain sustainable locations grew larger) bringing higher housing numbers into consideration. Other capacity uplifts associated with Option 3 and related transport interventions were however not ultimately considered to be reasonably plausible, bringing similar risks to those identified with Option 4A that was earlier discounted. As a strategic IIA cannot precisely define a tipping point in relation to the impact of different levels of growth, it is this assessment of deliverability and need to manage the risks of un-mitigated or uncoordinated growth, that is particularly influential in selecting the preferred spatial strategy.

5.32 As SHLAA work continued alongside the IIA, the GLA also found additional suitable industrial release and small sites potential associated with existing transport

connectivity compared to what had originally been assumed in Option 2. However, this was largely offset by downward pressures associated with viability – very significant viability issues have brought overall assumed delivery down, particularly in brownfield outer London. As such the preferred option is proportionately more reliant on capacity types and locations that are more viable including small sites and more central and accessible locations. This brings a mix of likely positive and negative effects.

5.33 Overall, the preferred spatial strategy is most influenced by the IIA findings for Option 2A as contrary to the plan-led approach that focuses development and mitigation effort on a limited number of locations. This means strategic mitigation (such as public transport investment) is spread too thinly reducing its effectiveness, and positive opportunities related to the scale of development (such as to support new shops and services and environmental enhancements) are reduced. The preferred spatial strategy conversely focuses development in a limited number of Green Belt residential-led BLGs with critical mass in the green belt, while providing for a sufficient range of these and industrial Green Belt locations to help increase the likelihood of overall delivery to meet economic and housing needs. The range of other types of brownfield capacity drawn on in a plan-led way likewise bring important delivery source diversity, increasing the chances of needs being met while spreading infrastructure and environmental impacts (more likely to be absorbable in the existing urban area, but potentially more difficult to manage) and benefits.

5.34 The policies developed to go with the preferred spatial strategy also make provision for the positive effects that the IIA framework strategic spatial options assessment criteria indicate should be considered in respect of environmental and place-making opportunity (see IIA framework and criteria at the end of **Chapter 4**). For instance, the draft London Plan includes environmental opportunity areas of various sub-types that development can help to deliver, with potential for nature recovery, water quality improvement, and improved access to green space. It also ensures that the approach to industrial release continues to protect important economic functionality, such as access to water-based transport, other good freight connections and infrastructure uses. It also makes provision for a wide range of strategic infrastructure that will help meet the social, health, environmental and economic needs of existing and future residents and businesses. This includes for instance the ability for residents and businesses to decarbonise their energy use and benefit from improved flood resilience.

5.35 Lastly the spatial strategy acknowledges the benefits demonstrated in respect of option 4B ultimately reaching the housing need number but over a longer time frame. It does so by identifying the 20-year future candidate BLGs in the urban area and Green Belt that should be safeguarded in order to optimise their future growth

potential. It also requires that the uncertainties over their development potential are positively engaged with, to make them either more certain and dependable, or to enable such locations to be ruled out in a subsequent round of plan-making. The broader policy approach of the plan should also help embed the mitigations required to manage the potentially more significant effects of this scale of growth.

Chapter 6

Integrated Impact Assessment findings for the draft London Plan

6.1 This chapter presents the IIA findings for the policies contained within the draft London Plan.

6.2 The appraisal findings for the policies are grouped by the chapter of the London Plan in which they fall, and for each group of policies a table is provided presenting the likely sustainability effects of each policy on each IIA objective. Text is provided below each table explaining the reasoning behind the effects identified. Unless otherwise stated, effects are likely to be long-term and permanent.

6.3 IIA recommendations were made to inform policy drafting, to identify where changes could be made to the policies to strengthen positive effects and mitigate any negative effects identified. The IIA recommendations are listed in **Table 6.1** with an explanation of whether they were incorporated into the draft London Plan or not and why.

Table 6.1: IIA recommendations and how they were taken into consideration in the drafting of policies

Policy	IIA recommendation	Was the recommendation incorporated into the Draft London Plan?	Reason for not incorporating the IIA recommendation
MBUL10 Security and safety	The policy could identify the specific safety and security measures for women, girls, and gender diverse people that should be considered and, where appropriate, incorporated into development proposals.	No	The policy provides a strategic level policy on security and safety, and it would not be appropriate to add detailed specific safety and security measures for particular groups.
HN10 Burial space	The 'Development management' section of Policy HN10 could be amended to make specific reference to the need to demonstrate compatibility with other environmental strategies to ensure that proposals further support wider environmental benefits.	Yes	N/A
GLE1 Sufficient and appropriate employment space	The draft implementation text for Policy GLE1 indicates that local plan-making policies that ensure a sufficient and appropriate supply of employment space may need to be supported by targeted Article 4 Directions to remove commercial to residential permitted development rights, particularly in locations such as the CAZ, Northern Isle of Dogs, town centres, high streets and industrial areas. It is recommended that this text is included in the policy. While there may be fewer residential	No	In this instance, the text encouraging boroughs to introduce targeted Article 4 Directions is an implementation matter and not policy.

Policy	IIA recommendation	Was the recommendation incorporated into the Draft London Plan?	Reason for not incorporating the IIA recommendation
	units delivered via permitted development rights (which do not include affordable housing) this should be offset by residential units (often of better quality and including provision of affordable housing) delivered through conventional planning permissions.		
GLE6 Visitor infrastructure	As many of London's visitor attractions are associated with London's outstanding heritage, it is recommended the 'historic environment' is included in the list of matters in relation to supporting enhancements. This approach would help to support the conservation and enhancement of the historic environment associated with such visitor attractions. The policy could require consideration of the socio-economic and environmental impacts of waste management facilities when allocating or permitting sites and how these will be mitigated.	Yes	N/A
GLE12 Waste	The policy could require consideration of the socio-economic and environmental impacts of waste management facilities when allocating or permitting sites and how these will be mitigated.	No	The locational criteria set out in the policy provide a clear steer as to where waste sites should be located, and such locations would not typically be where sensitive development would be located.

Policy	IIA recommendation	Was the recommendation incorporated into the Draft London Plan?	Reason for not incorporating the IIA recommendation
GHR6 Trees, biodiversity and geodiversity	The wording of GHR6 part B could be amended to strengthen expectations of tree planting from development proposals by removing “seek to” from before “deliver new tree planting”.	Yes	N/A
GHR9 Clean and healthy waterways	To address recreational pressures on waterways, the policy could include a reference to ensuring appropriate management plans are in place for any recreational activities proposed on London’s waterways.	Yes	N/A
GHR10 Air quality	It is recommended that the supporting text provides additional clarity that consideration should be given to the impact on vulnerable groups and/or those with protected characteristics.	Yes	N/A
PV3 Town centres and high streets	Policy PV3 could be amended to promote all town centres as locations suitable for mixed-use and housing-led intensification, making the best use of land and taking into account opportunities to conserve and enhance the historic environment.	Yes	N/A
PV4 Strategic economic	The 'Plan making' section of Policy PV4 could be strengthened to support a mix of uses across the cluster, as appropriate, including	No	The policy as drafted supports the provision of a mix of uses in Strategic Economic Clusters, as appropriate, including housing. The policy

Policy	IIA recommendation	Was the recommendation incorporated into the Draft London Plan?	Reason for not incorporating the IIA recommendation
clusters and corridors	housing (currently this is only considered within the development management principles). Part A of Policy PV4 could refer to locations that have the potential to be well-connected by public transport to indicate that not all the clusters identified have good public transport accessibility at the present time.		states that Strategic Economic Clusters should be well-connected by public transport and that development proposals are supported where they are, or can be made, accessible and well-connected by public transport and active travel modes.

Duration of sustainability effects

6.4 The London Plan sets out an integrated framework for the development of London over the next 20-25 years, including requirements for homes, jobs, transport, and other infrastructure, as well as policies to ensure quality development. The Plan will run from adoption to 2050, meaning that the timescales for effects resulting from policies within the London Plan could be up to 25 years. In reality, some of the policies may have short-term effects (over the next 5 years), medium-term effects (over the next 10 years), or long-term effects (over the whole Plan period).

Short-term effects of the London Plan

6.5 The impacts of the London Plan in the short-term would mostly relate to the initial impacts of construction, including housing, employment land, and transport schemes where these are already in progress or planned for the early part of the Plan period. This could include the removal of vegetation, topsoil, sub soil, and provision of infrastructure required. Such works could have negative impacts on biodiversity, local amenity (possible disruption to rights of way, traffic flows, noise generation etc.), soil quality, and the landscape. However, these impacts would be temporary in nature and should be minimised through implementation of the safeguards set out in the policies proposing development, in addition to a number of the 'Creating a greener, healthier, and resilient city' policies (e.g. Policies GHR6 Trees, biodiversity and geodiversity, GHR9 Clean and healthy waterways and GHR10 Air quality).

Medium-term effects of the London Plan

6.6 Negative impacts in the medium-term include the potential implications of developments on health and local amenity (e.g. noise, dust, increased traffic etc.), although as noted above, these should be minimised through implementation of the requirements in the policies proposing development, in addition to Policy GHR10 Air quality. In addition, there are likely to be positive medium-term effects on health and quality of life by delivering improved affordable housing availability and social infrastructure. Medium-term positive impacts also relate to the employment and economic benefits of enabling and delivering new employment opportunities through the policies in the 'Growing London's economy in a way that benefits all' chapter.

Long-term effects of the London Plan

6.7 Long-term, permanent benefits that would result from the London Plan include the provision of housing, employment, improved transport infrastructure which would

positively impact employment, the economy and quality of life. Green infrastructure may have some long-term, permanent positive impacts for biodiversity, landscape and flooding through the creation of new habitats, enhancement of degraded sites, implementation of sustainable drainage systems and enhancement of townscape and landscape through well designed facilities.

6.8 Long-term, permanent negative impacts of the London Plan are potentially: increased waste generation overall from a growing population, climate change implications of the energy required in new housing and employment; and the disturbance and/or removal of archaeological remains, some of which may be of national significance. However, these effects could be avoided or mitigated through implementation of the requirements in many of the 'Making best use of land and achieving Good Growth' policies (e.g. Policies MBUL2 Optimising the use of land and site capacity, MBUL6 High quality design for a growing, changing city and MBUL7 London's heritage) and 'Creating a greener, healthier, and resilient city' (e.g. Policies GHR1 Energy efficiency, GHR2 Low cost low carbon heat and GHR3 Whole life-cycle carbon) policies.

Making best use of land and achieving Good Growth

6.9 The section presents the appraisals of the following draft London Plan policies:

- Policy MBUL1 Spatial strategy
- Policy MBUL2 Optimising the use of land and site capacity
- Policy MBUL3 Tall buildings
- Policy MBUL4 Utilities – capacity, connectivity, and resilience
- Policy MBUL5 Sustainable transport to enable London's growth
- Policy MBUL6 High quality design for a growing, changing city
- Policy MBUL7 London's heritage
- Policy MBUL8 Inclusive design
- Policy MBUL9 Healthy streets and public realm
- Policy MBUL10 Security and safety

6.10 The likely effects of the policies in relation to each IIA objective are shown in **Table 6.2** and described below the table.

Table 6.2: Likely effects of the 'Making best use of land and achieving Good Growth' policies

IIA objective	Policy MBUL1	Policy MBUL2	Policy MBUL3	Policy MBUL4	Policy MBUL5	Policy MBUL6	Policy MBUL7	Policy MBUL8	Policy MBUL9	Policy MBUL10
IIA1: Best use of land and resources	++/-	++	++/-	0	+	+	0	0	+	0
IIA2: Housing	++/-	++?	0	0	+	0	0	+	0	0
IIA3: Economic potential	++	0	+	+	+	0	+	+	+	0
IIA4: Successful placemaking	+	++	++	0	++	++	+	+	++	0
IIA5: Health and community safety	+/-	+	+	0	++	+	0	+	++	++
IIA6: Equality of opportunity	+	0	0	0	+	+	+	++	++	+
IIA7: Climate change	+/-	+/-	-	+	+	+	+	0	+	-
IIA8: Biodiversity and geodiversity	+/-	+/-	0	0	+	0	0	0	+	-
IIA9: Historic environment	+/-?	0	+	0	0	0	++	0	0	0

Policy MBUL1 Spatial strategy

6.11 Policy MBUL1 sets out the overarching strategy for where new housing and employment development and infrastructure investment should be located and how it should be phased, co-ordinated and designed to meet London's spatial development needs in a way that optimises outcomes across the Good Growth objectives. It seeks to make the best use of land by maximising intensification of the existing urban area and delivering as much of the required development as possible on brownfield land. However, even with this approach, the GLA's evidence studies have shown that the full standard method housing level of need cannot be met fully within the existing urban area. Therefore, the policy also requires Local Plans to make provision for further strategic growth beyond the existing built-up area through site allocations and Green Belt release in identified Broad Locations for Growth. This will involve development of greenfield land, which is a less efficient use of land, but which comprises a small proportion of the overall growth required (approximately 10%). Therefore, Policy MBUL1 is expected to have mixed significant positive and minor negative effects in relation to IIA objective 1: Best use of land and resources.

6.12 As noted above, Policy MBUL1 seeks to provide as much as possible of the standard method assessed housing need (558,000 homes instead of 850,000). However, the evidence studies have shown that the full need cannot be met even by optimisation of brownfield sites and increased densification in more parts of London (e.g. through mid-rise development around transport connections and tall buildings in certain strategic locations) and some Green Belt release focused around existing, public transport stations. While the policy prioritises affordable housing provision in developer contributions, and a mix of housing types is covered by other policies in the 'Delivering the homes and neighbourhoods Londoners need' chapter, Policy MBUL1 has clause A(5) which may include agreeing exceptions to affordable housing prioritisation particularly in early scheme phases in relation to the diversity of housing mix and delivery model in order to benefit overall strategic site delivery. This may limit the provision of affordable housing in the short term. Overall, the policy is expected to have a significant positive effect in relation to IIA objective 2: Housing, mixed with a minor negative due to not meeting the full standard method requirement and the potential exceptions to affordable housing priority in the short term.

6.13 Policy MBUL1 requires Local Plans to deliver proportionate space for employment and appropriate infrastructure in a manner consistent with Policy GLE1 Sufficient and appropriate employment space. The strategy's emphasis on intensification of land use across London in a way that contributes to meeting London's different needs builds on the success of economic clusters and promotes greater connectivity via sustainable transport, which will help to unlock London's economic potential and improve access to employment opportunities. Therefore,

Policy MBUL1 is expected to have a significant positive effect in relation to IIA objective 3: Economic potential.

6.14 Policy MBUL1 seeks to deliver homes, employment space and infrastructure in a manner consistent with the 'Place-visions and place-based approaches' policies and to achieve intensification of land use across London in a way that responds positively to London's place assets and could contribute to successful placemaking. It also requires Local Plans to secure through safeguarding, site allocations and appropriate developer contributions and enhancement of green infrastructure including existing greenspace, which can contribute to the enjoyment and enhancement of place-based assets. Other policies in the Plan cover placemaking more specifically, therefore, Policy MBUL1 is expected to have a minor positive effect in relation to IIA objective 4: Successful placemaking.

6.15 The policy includes a requirement for Local Plans to secure additional strategic healthcare, emergency services and criminal justice infrastructure, commensurate with expected housing-related population and spatial growth. In addition, Local Plans should help realise strategic opportunities for nature recovery, enhanced access to green space and cleaner, healthier waterways, all of which contribute to people's physical and mental health and wellbeing. However, the increased density of new development across London could give rise to negative effects on health related to air quality, light and noise. Therefore, Policy MBUL1 is expected to have a mixed minor positive and minor negative effect in relation to IIA objective 5: Health and community safety.

6.16 There are elements of Policy MBUL1 which help to meet diverse needs of Londoners and promote greater equality of opportunity. The policy requires new housing and employment development to be located and designed to promote greater connectivity and inclusivity, and notes that intensification of land use across London should be achieved in a way that contributes to meeting London's different needs. It also prioritises provision of affordable housing provision and public transport improvements in developer contributions. These should all help to reduce existing inequalities, and therefore the policy is expected to have a minor positive effect in relation to IIA objective 6: Equality of opportunity.

6.17 Given Policy MBUL1's brownfield first focus, support for higher-density development in locations with good sustainable transport accessibility, as well as requirements for demand management interventions to ensure sustainable transport viability, it supports reductions in transport-related emissions. However, increased density in the existing built-up area could also exacerbate risks such as urban heat island effects and surface water flooding if not accompanied by climate-resilient design measures, which are addressed in other policies. Similarly, development in

the Green Belt BLGs could also increase impermeable surfaces and contribute to surface water flooding. However, the policy does also seek to improve the climate change resilience of people and places within London by requiring Local Plans to secure enhancement of green infrastructure, provision of and/or connection to heat networks, energy and water efficiency measures and flood risk mitigation. Therefore, the policy is expected to have mixed minor positive and minor negative effects in relation to IIA objective 7: Climate change.

6.18 Policy MBUL1's prioritisation of brownfield intensification will reduce pressure on greenfield land and designated sites and protected habitats, although it is noted that numerous designated biodiversity sites and SINCs occur in the built-up area as well. The spatial strategy also allows for targeted greenfield development within the identified Green Belt BLGs which could result in some loss of biodiversity, although this should be avoided through requirements in the policy and other policies in the 'Creating a greener, healthier and resilient city' chapter. Policy MBUL1 requires Local Plans to help realise the identified strategic opportunities for nature recovery, enhanced access to green space, and cleaner, healthier waterways through site allocations and spatial policies and appropriate developer contributions that secure connected and multi-functional green and blue infrastructure. Therefore, the policy is expected to have mixed minor positive and minor negative effects on IIA objective 8: Biodiversity and geodiversity.

6.19 The scale and intensification of growth required through Policy MBUL1 could create opportunities to conserve and enhance London's distinctive heritage assets and their settings but if not managed carefully, could also put pressure on them. The policy notes that new housing and employment development should be delivered to achieve intensification of land use across London in a way that responds positively to London's place assets. It is assumed that this includes the significant number of World Heritage Sites, scheduled monuments, listed buildings and conservation areas within London. Therefore, Policy MBUL1 is expected to have mixed minor positive and minor negative effects in relation to IIA objective 9: Historic environment, with some uncertainty as it will depend on final design and layout of new development.

Reasonable alternatives

6.20 The spatial strategy options considered by the GLA and assessed in the IIA are discussed in **Chapter 5**.

Policy MBUL2 Optimising the use of land and site capacity

6.21 Policy MBUL2 seeks to make the best use of land by requiring the optimisation of land in locations with existing or planned sustainable transport connectivity, requiring minimum net densities to be met or exceeded through the use of the optimisation framework in Box MBUL2. This directly supports densification at both plot and neighbourhood scales, and therefore strongly contributes to making efficient use land. The policy encourages plan-making authorities to identify and allocate small sites, including listing them on brownfield registers, which further supports the re-use of previously developed land and reduces pressure on greenfield locations. The policy supports the use of Local Development Orders and design codes which will provide more development certainty, further supporting densification and the re-use of previously developed land. Therefore, Policy MBUL2 is expected to have a significant positive effect in relation to IIA objective 1: Best use of land and resources.

6.22 The policy will support delivery of a greater quantum of housing through optimisation of density, faster routes to consent, and increased certainty for developers. Requirements to meet or exceed minimum density thresholds, combined with the acceptability-in-principle of compliant small-site schemes, are likely to facilitate housing development in areas that have traditionally had lower levels of housing development. By encouraging plan-making authorities to proactively identify and allocate small sites, and to combine sites where appropriate to support mid-rise (12–30m) development, the policy broadens the range of sites available for housing delivery and supports different development typologies. This contributes positively to housing choice and flexibility in supply, though the policy does not directly address tenure or affordability, which are addressed in other policies. The focus in the policy on design codes and masterplanning is likely to support housing quality and consistency, although this could introduce some uncertainty if overly prescriptive codes affected viability. However, explicit safeguards against undermining development viability reduce this risk. Overall, the policy is expected to have a significant positive effect in relation to IIA objective 2: Housing, with some uncertainty.

6.23 The policy links increases in density with sustainable transport access through the optimisation framework, supporting the development and sustainability of well-served mixed use places that reduce the need to travel by private car. The optimisation framework in Box MBUL2 is based on six character settings and the process includes identifying an area's potential and/or sensitivity to change to inform where in the range is optimum, ensuring that existing design quality and neighbourhood character is considered in use of the framework. The policy further promotes the use of character studies, sensitivity assessments and locally refined design codes which should support high quality, context responsive development.

Therefore, the policy is expected to have a significant positive effect in relation IIA objective 4: Successful placemaking.

6.24 Optimisation of sites based on sustainable transport accessibility could enhance connectivity between communities and promote improved access to social and community facilities, and natural greenspace. The approach to site coverage supports the creation of compact and connected forms of development that will encourage active travel and recreation, providing additional opportunities for social interaction. Therefore, the policy is expected to have a minor positive effect in relation to IIA objective 5: Health and community safety.

6.25 The policy promotes higher-density development in locations with good sustainable transport accessibility, which supports reductions in transport-related emissions and more efficient use of infrastructure. However, increased density can also exacerbate risks such as urban heat island effects and surface water flooding if not accompanied by climate-resilient design measures, which are addressed in other policies. Therefore, this policy is expected to have mixed minor positive and minor negative effects in relation to IIA objective 7: Climate change.

6.26 By focusing development on previously developed land and through optimisation of existing urban sites, the policy may reduce pressure on greenfield land and designated sites and protected habitats. However, higher densities can increase development intensity in urban areas, potentially reducing on-site green space or increasing disturbance pressures. Therefore, the policy is expected to have mixed minor positive and minor negative effects on IIA objective 8: Biodiversity and geodiversity.

6.27 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.28 The GLA identified the following reasonable alternative options to Policy MBUL2 Optimising the use of land and site capacity:

- Option 1: Rely on a single London-wide minimum building height to uplift development capacity rather than an optimisation framework with spatially set density minimums and building height ranges.

6.29 The overall effects of Option 1 are likely to be the same as Policy MBUL2. However, relying on a single London-wide minimum building height could lead to the minimum height being set too high in some areas and too low in others, risking inappropriately tall/dense development in some areas and facilitating underdevelopment in others, not fully capitalising on public transport accessibility and

potentially increasing pressure on greenfield locations. This could result in a minor negative effect in relation to IIA objectives 1: Best use of land and resources and 4: Successful placemaking. While Option 1 would support a greater quantum of housing development, setting a London-wide building height may not fully realise the housing potential of sites, resulting in a minor positive effect in relation to IIA objective 2: Housing. Policy MBUL2 was selected because the location-based density and height range in the optimisation framework supports higher minimum densities and building heights in areas where it is more contextually appropriate than the alternative and thus is more likely to support the delivery of more housing.

Policy MBUL3 Tall buildings

6.30 Policy MBUL3 requires plan-making authorities to identify locations for tall buildings (over 30m in height) and metropolitan scale tall buildings over 100m in height. Tall buildings can help to support higher densities in a sustainable way, through the optimisation and efficient use of land. The policy refers to Box MBUL3A, which contains a set of criteria to guide which locations are suitable for tall buildings, and that tall buildings should be limited to appropriate locations. This means that tall building development will be focused in the most suitable locations with good public transport accessibility, supporting densification in areas that are well served by necessary infrastructure. However, tall buildings require a considerable number of materials and resources in their construction. Therefore, the policy is expected to have mixed significant positive and minor negative effects in relation to IIA objective 1: Best use of land and resources.

6.31 Tall buildings, particularly of metropolitan scale, can play an important role in the branding of a city and in attracting investment. The policy's approach to managing tall buildings will positively influence London's skyline and global image. Therefore, the policy is expected to have a minor positive effect in relation to IIA objective 3: Economic potential.

6.32 The policy places substantial emphasis on ensuring that tall buildings make a positive contribution to the character of an area and have a positive visual impact at the local and wider London scale, in addition to improving legibility. The identification of locations where metropolitan scale tall buildings should be directed will ensure that buildings that have a wide visual impact and influence are managed in a strategic way. This will support high design quality and ensure that new tall buildings are integrated into neighbourhoods in a way that improves the quality and distinctiveness of the built environment. The detailed requirements for development proposals which focus on managing the visual, functional and environmental impacts of tall buildings will help to ensure that the public realm around tall buildings remains useable and

attractive and that overall tall buildings contribute positively to the development of well-served, mixed use places. Overall, Policy MBUL3 is expected to have a significant positive effect in relation to IIA objective 4: Successful placemaking.

6.33 The tall building design criteria require tall buildings to be designed to ensure personal safety at height and specifically manage suicide risk. This should help enhance safety in tall buildings and the surrounding public realm. Specific requirements in relation to tall buildings around the River Thames and the riverside public realm will support active travel and recreational opportunities, which can have a positive impact on health. The encouragement of free to enter publicly accessible areas in the most prominent buildings could also provide opportunities for social interaction in areas where there have been limited opportunities for this. Therefore, Policy MBUL3 is expected to have a minor positive effect in relation to IIA objective 5: Health and community safety.

6.34 The policy supports the development of tall buildings, which can require a considerable number of materials in their construction that have high levels of embodied carbon such as steel and concrete, compared to lower height development. Therefore, the policy is expected to have a minor negative effect in relation to IIA objective 7: Climate change

6.35 Proposals for tall buildings are required to make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views. This will support the conservation and enhancement of heritage assets that form part of strategic views, including the three World Heritage Sites. The locational criteria for tall buildings in the policy means they should not be located in areas that are sensitive to the impacts of tall buildings, in respect to heritage assets. This will help ensure that the policy supports the conservation of heritage assets. Therefore, the policy is expected to have a minor positive effect in relation to IIA objective 9: Historic environment.

6.36 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.37 The GLA identified the following reasonable alternative options to Policy MBUL3 Tall buildings:

- Option 1: Do not identify locations for metropolitan tall buildings (over 100m in height)

6.38 The overall effects of Option 1 are likely to be the same as the effects for Policy MBUL3. However, the strategic nature of the visual and other impacts that buildings

of this height have, for example that they can be seen across many boroughs, means that leaving identification of appropriate locations to the local level would be less effective in managing their impact on the character and function of local areas and London as a whole. Therefore, Option 1 is expected to have a minor positive effect in relation to IIA objective 4: Successful placemaking. Policy MBUL3 was selected because it enables strategic planning for the locations of tall buildings that have the most visual and other impacts.

Policy MBUL4 Utilities – capacity, connectivity, and resilience

The policy seeks to address sufficiency of utilities provision that has been identified as a barrier to economic growth, including energy and digital. The requirement to incorporate appropriate demand-management and supply and distribution infrastructure and other measures (to relevant minimum standards where specified) within development proposals to meet system needs will reduce overall demand and contribute to co-ordinated provision of new capacity and infrastructure investment in areas where this is required. Therefore, Policy MBUL4 is expected to have a minor positive effect in relation to IIA objective 3: Economic potential.

6.39 Policy MBUL4 specifies relevant minimum standards for water consumption and energy through Box MBUL4. These standards are likely to facilitate reductions in energy use, which will reduce CO₂ emissions and make it easier to achieve net-zero goals, as less renewable capacity is needed to replace existing fossil fuel generation. The standards are also likely to help reduce surface water flood risk alongside lower water demand, decreasing energy consumption for pumping, treatment, and heating water which helps lower emissions. Therefore, Policy MBUL4 is expected to have a minor positive effect in relation to IIA objective 7: Climate change.

6.40 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.41 None identified.

Policy MBUL5 Sustainable transport to enable London's growth

6.42 Policy MBUL5 seeks to facilitate a greater proportion of travel being made by walking, cycling and public transport and a smaller proportion being made by cars. It does this by requiring a greater level of planning of local transport interventions alongside and through Local Plans and setting requirements for development proposals. These measures support a shift away from cars which use road space

considerably less efficiently than alternatives. Making better use of road space enables a greater degree of growth within the same network capacity and performance, supporting densification at a plot and neighbourhood level and better integration of transport with local land use planning. The relationship between transport and the efficient use of land is very strong, though the policy in itself is only part of wider efforts to influence London's transport system. Therefore, Policy MBUL5 is expected to have a minor positive effect in relation to IIA objective 1: Best use of land and resources.

6.43 Policy MBUL5 seeks to facilitate the delivery of transport schemes that unlock housing and add necessary capacity to accommodate London's growth, helping to facilitate the delivery of additional housing. It does this through setting requirements for both Local Plans and development proposals to ensure adequate protection for these schemes, either through the use of land and/or design of development. Therefore, Policy MBUL5 is expected to have a minor positive effect in relation to IIA objective 2: Housing.

6.44 Policy MBUL5 seeks to reduce crowding and congestion on London's transport network, in part to reduce economic barriers to a more efficient flow of workers and customers to businesses across London. It does this by supporting a shift towards space efficient modes of transport via the planning of local transport interventions and protection for transport schemes, requiring developments to assess and mitigate their impacts, and requiring appropriate facilities for freight. This will help to support economic growth and improve access to employment, including for people without a car. Therefore, Policy MBUL5 is expected to have a minor positive effect in relation to IIA objective 3: Economic potential.

6.45 Policy MBUL5 seeks to reduce the dominance of traffic in public space and the noise and severance generated by motor vehicles. It does this through various requirements to support a shift away from cars, including through requiring the identification of local walking and cycling schemes and by requiring parking standards at borough level to adhere to the maximum levels set out. The policy also includes measures seeking to reduce the adverse impacts of freight traffic, including the management of deliveries and servicing and the use of shared facilities. These measures will help to support the creation of a safe, accessible and attractive public realm that encourages people to socialise and use active forms of travel. Therefore, Policy MBUL5 is expected to have a significant positive effect in relation to IIA objective 4: Successful placemaking.

6.46 Policy MBUL5 seeks to improve road safety and improve public health outcomes relating to transport, namely increasing levels of physical activity and improving air quality. It does this through various requirements to support a shift

away cars, including through requiring the identification of local walking and cycling schemes and the provision of adequate cycle parking in new developments. In terms of air quality, these measures to increase sustainable transport use can reduce emissions of nitrogen oxides emissions more quickly compared to waiting for the vehicle fleet to entirely electrify and is the only way to address particulate matter emissions from tyre and brake wear. In the case of physical activity, levels among those travelling in cars is considerably lower than those walking, cycling or taking public transport and those using those modes are more likely to meet their daily requirements for physical activity. Therefore, Policy MBUL5 is expected to have a significant positive effect in relation to IIA objective 5: Health and community safety.

6.47 A minor positive effect is expected in relation to IIA objective 6: Equality of opportunity as the measures set out in the policy will help to ensure equitable access to jobs, services and facilities for people who are reliant on public transport. Improvements to the safety and convenience of the public transport network will encourage and enable more people to access it, including those who may face disadvantage.

6.48 Policy MBUL5 seeks to reduce carbon emissions generated by London's transport network. It does this through various requirements to support a shift away from cars, which are the biggest source of transport emissions in London, as detailed above. Therefore, Policy MBUL5 is expected to have a minor positive effect in relation to IIA objective 7: Climate change.

6.49 Policy MBUL5 will help to protect sensitive habitats and species where they are susceptible to the impacts of air pollution, by encouraging modal shift and setting out a range of measures which will combine to improve air quality. Therefore, Policy MBUL5 is expected to have a minor positive effect in relation to IIA objective 7: Biodiversity and geodiversity.

6.50 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.51 The GLA identified the following reasonable alternative options to Policy MBUL5 Sustainable transport to enable London's growth:

- Option 1: Do not require boroughs to identify local transport schemes.

6.52 The overall effects of Option 1 are likely to be the same as Policy MBUL5. However, while many boroughs have strong transport planning processes in place, this is not always done on a consistent basis and the level of integration with land use planning can be mixed. Not requiring boroughs to identify local transport

schemes would risk missing opportunities to make better use of London's transport network, which given the scale of growth required, is more important than it has ever been. Therefore, the positive effects identified in relation to Policy MBUL5 would likely be reduced. Policy MBUL5 was selected because greater integration of local transport planning and land use planning is needed to make the most of opportunities to support growth.

Policy MBUL6 High quality design for a growing, changing city

6.53 Policy MBUL6 makes best and efficient use of land and resources by requiring plan-making authorities to plan positively for contrasting uses to co-exist side by side and in mixed use liveable neighbourhoods through their site allocations and spatial and design policies. Enabling denser urban forms can support more effective use of resources during operation through economies of scale and other efficiencies, and the policy's focus on multi-functionality and co-ordination in relation to physical infrastructure will also contribute to minimising the use of resources in construction and operation. Therefore, the policy is expected to have a minor positive effect in relation to IIA objective 1: Best use of land and resources.

6.54 Requirements to plan positively for contrasting uses and infrastructure that delivers multi-functionality will support the creation of well-served, mixed use places that can sustain a range of uses and reduce the need to travel by private car. Encouraging the use of design codes and the design requirements relating to the character, layout, form and materials of development will support neighbourhood distinctiveness and improvements in the quality of the built environment. Policy MBUL6 also addresses microclimatic conditions and requires development to reduce potential negative impacts on neighbourhood amenity including addressing wind, daylight, sunlight penetration and temperature conditions around buildings. This will have positive impacts on the vibrancy, comfort and enjoyment of nearby open spaces and the public realm, encouraging people to socialise while also supporting active travel. Overall, the policy is expected to have a significant positive effect in relation to IIA objective 4: Successful placemaking.

6.55 The policy requires development proposals to design in measures to reduce exposure to noise and air pollution. This will have positive impacts on health. More generally, designing for multi-benefits and liveable mixed-use areas could provide increased opportunities for social interaction at a neighbourhood level with positive impacts on people's wellbeing. Further to this, maximising active frontages will provide passive surveillance, and this could improve safety and feelings of safety. The policy also requires infrastructure to be designed for security and ensure a co-ordinated 'dig once' approach at construction stage to minimise disruption. This will

minimise the risk of disturbance by noise, vibration and dust during construction of infrastructure and prompt design which enhances safety. Therefore, the policy is expected to have a minor positive effect in relation to IIA objective 5: Health and community safety.

6.56 For referable scale development proposals, the policy requires that these have undergone at least one independent design review before an application is submitted. The potential need for inclusive design review and other specialist design review and advice as part of this is specifically highlighted. This should help to ensure that designs have been informed by diverse views. Therefore, Policy MBUL6 is expected to have a minor positive effect in relation to IIA objective 6: Equality of opportunity.

6.57 The requirement for plan-making authorities to use the latest climate risk modelling to inform site allocations, spatial policies and design specifications will promote climate resilient building design and could also improve the climate resilience of the wider area by ensuring that plan-making authorities consider risks as well as opportunities when developing local policies. Therefore, the policy is expected to have a minor positive effect in relation to IIA objective 7: Climate change.

6.58 The policy is not likely to have an effect on any of the other IIA objectives

Reasonable alternatives

6.59 None identified.

Policy MBUL7 London's heritage

6.60 London's distinctive character and historic environment attracts businesses and tourists from across the globe and makes a vital contribution to London's economy. The policy also requires Local Plans to include policies which conserve, promote, and actively protect the Outstanding Universal Value of World Heritage Sites (WHS). These sites in particular form an integral part of London's character, attracting large numbers of visitors and contributing substantially to London's economic growth and prosperity. Overall, the policy is expected to have a minor positive effect in relation to IIA objective 3: Economic potential.

6.61 Policy MBUL7 requires plan-making authorities to support and make use of the Greater London Historic Environment Record to identify heritage assets and the contribution they can make to a sustainable environment, communities and growth. This will help to ensure that Local Plans will help to maintain the varied and distinctive townscape of London and its relationship with the wider landscape, and

that new development appropriately integrates with and improves the quality and distinctiveness of the built environment. Therefore, the policy is expected to have a minor positive effect in relation to IIA objective 4: Successful placemaking.

6.62 The policy encourages the development of local heritage strategies that capture the benefits of local heritage and its contribution to a diverse cultural offer. Involving local communities in the recognition and enhancement of local heritage may help support greater participation in public life and may help to protect the character of places linked to the identity and needs of particular groups. The preservation of historical assets will also improve wider access to London's historic and cultural offerings, which can act as important centres for social interaction, community events and cultural education. This can help to improve the wider understanding and appreciation of heritage assets across London and could also help to foster inclusion and support good relations between different communities. Therefore, Policy MBUL7 is expected to have a minor positive effect in relation to IIA objective 6: Equality of opportunity.

6.63 The policy supports energy efficiency, decarbonisation and renewable microgeneration measures on heritage assets where these achieve an appropriate balance with conserving the significance of heritage assets. While in principle this should help mitigate climate change, it may not always be possible for proposed measures to achieve an appropriate balance with conserving the significance of heritage assets. In practice, this means that the scale of delivery of such measures on heritage assets is uncertain. Overall, therefore, the policy is expected to have a minor positive effect in relation to IIA objective 7: Climate change, with some uncertainty.

6.64 The primary focus of the policy is to set out a specific approach to the historic environment in London, including its World Heritage Sites. Therefore, a significant positive effect is expected in relation to IIA objective 9: Historic environment. Embedding the use of up-to-date World Heritage Site Management Plans and Setting studies into plan-making will ensure that local policies and proposals support the conservation, enhancement and enjoyment of these heritage assets. The requirement to develop and maintain up-to-date Archaeological Priority Areas (APAs) for plan-making and decision-taking will ensure that development proposals impacting these heritage assets help to better reveal their significance through display and interpretation, promoting greater understanding and enjoyment of London's historic environment. By encouraging the use of design codes, Local Listed Building Consent Orders and/or Local Development Orders to provide certainty about appropriate alterations and/or extensions to historic buildings, the policy supports a streamlined process for improvements to historic buildings in a manner appropriate to their significance.

6.65 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.66 None identified.

Policy MBUL8 Inclusive design

6.67 The requirements for development proposals to be designed to respond to and accommodate the requirements of London's diverse population and be flexible so as to respond to future requirements, will contribute to the quality of housing by supporting design that reflects end user requirements and is appropriately adaptable to anticipated future changes in housing needs. Therefore, Policy MBUL8 is expected to have a minor positive effect in relation to IIA objective 2: Housing.

6.68 By supporting increased inclusivity across the built environment, the policy supports improved access to economic activity more generally and could help reduce barriers to economic participation by ensuring that developments are convenient and welcoming with no disabling barriers. Therefore, Policy MBUL8 is expected to have a minor positive effect in relation to IIA objective 3: Economic potential.

6.69 By requiring proposals to design welcoming spaces that respond to and accommodate the requirements of London's diverse population, the policy will support the creation and maintenance of buildings and places that are convenient and enjoyable to use for everyone. This will improve the quality of the built environment and contribute to increased footfall and more people walking, wheeling, cycling and socialising. Supporting improved physical accessibility into workplaces, shops, services and facilities, and a focus on designing in what local communities want and need through end user engagement, will also help support the creation of attractive, distinct and successful places. Overall, Policy MBUL8 is expected to have a minor positive effect in relation to IIA objective 4: Successful placemaking.

6.70 Ensuring an inclusive built environment that provides people focused places and spaces could encourage social interaction, with positive effects on people's wellbeing. Fear of crime can be a barrier to active travel and more generally can be stressful and limit people's access to activities, as some groups are at higher risk including women, disabled people, LGBTQ+ and BAME communities. The policy's focus on design that accommodates the requirements of London's diverse population should result in spaces that enhance safety and feelings of security and that people feel comfortable being in, supporting improved access to social and community facilities, open spaces, and active travel opportunities. Therefore, Policy MBUL8 is

expected to have a minor positive effect in relation to IIA objective 5: Health and community safety.

6.71 A significant positive effect is expected for the policy against IIA objective 6: Equality of opportunity, as the overall objective of the policy to create an inclusive built environment that will better support all Londoners to move around and partake in life in the city. The requirements to include specific information in Design and Access Statements should help to ensure designs have been informed by diverse views and have considered the full range of barriers to inclusion (physical, cultural, psychological). The requirements around level access will help to remove the physical barriers to inclusion and participation that many groups face, securing greater equality of opportunity by better meeting specific needs. This is particularly important for lesser mobile communities, including those with a disability or existing health condition, older people, and those who are pregnant or have recently given birth or have very young children. Requirements in relation to evacuation lifts will ensure that building users can evacuate a building with safety and dignity.

6.72 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.73 None identified.

Policy MBUL9 Healthy streets and public realm

6.74 Policy MBUL9 applies to all publicly accessible spaces within and outside buildings, including streets. All development proposals provide an opportunity to improve the public realm for people to enjoy. Policy MBUL9 particularly encourages major developments to maximise opportunities to create a new and improved public realm and utilise development sites to create a temporary public realm – both of which make the best use of land for Londoners to enjoy. Further to this, the focus on an improved environment for walking and cycling, and reducing vehicle dominance, encourages better use of road space and kerbs. Therefore, Policy MBUL9 is expected to have a minor positive effect in relation to IIA objective 1: Best use of land and resources.

6.75 A high-quality public realm can have beneficial effects in terms of economic activity by creating environments that attract people to (and their subsequent spend in) an area. A high-quality public realm can also help attract businesses and investors to an area. Therefore, Policy MBUL9 is expected to have a minor positive effect in relation to IIA objective 3: Economic potential.

6.76 The focus of Policy MBUL9 is successful placemaking, which will be achieved by new developments creating, improving and enhancing publicly accessible places so that they are welcoming, well-designed and well-maintained mixed-use social spaces that are inclusive and safe (during the day and night). The policy also seeks to provide public spaces where people feel a sense of place and belonging by engaging local communities to inform the design of these public spaces. Therefore, Policy MBUL9 is expected to have a significant positive effect in relation to IIA objective 4: Successful placemaking.

6.77 The policy focuses on implementing the Healthy Streets Approach with its ten indicators to address health inequalities, and improving air quality by encouraging walking, wheeling, cycling and uptake of public transport, with improvements to public health. Additionally, the focus on safety and feelings of safety both during the day and night aligns with the Mayor's ending Violence against Women and Girls (eVAWG) Strategy. The policy requires clear sightlines, well-designed lighting, and natural surveillance through integrated design, which will likely create safe public spaces across London. The policy also seeks to minimise road danger. Therefore, Policy MBUL9 is expected to have a significant positive effect in relation to IIA objective 5: Health and community safety.

6.78 Overall, the policy creates an opportunity for public space to be designed in such a way that it can be used by people of different ethnic backgrounds, age groups, income levels, genders and abilities, including pregnant women and disabled people. This is because the policy focuses on safety, inclusive design, provision of step-free access, a variety of free to use seating, public toilets, provision of school streets, and engagement with local communities, including women and girls. This can promote greater equality of opportunity by meeting diverse needs to achieve a more inclusive, integrated, and fair city. Therefore, the policy is expected to have a significant positive effect in relation to IIA objective 6: Equality of opportunity.

6.79 Since the policy focuses on encouraging walking, cycling and public transport, implementing bus priority and sustainable delivery of goods and servicing, along with parking, the policy will likely help reduce greenhouse gas emissions associated with transport. Minimising impermeability, improving sustainable drainage, planting trees for shade and incorporating biodiverse planting could also improve climate resilience and help with climate adaptation by improving flood resilience and reducing the urban heat island effect. Therefore, the policy is expected to have a minor positive effect in relation to IIA objective 7: Climate change.

6.80 The policy requires developments to contribute towards planting trees for shade and shelter, in addition to encouraging biodiverse planting. Therefore, the policy is

expected to have a minor positive effect in relation to IIA objective 8: Biodiversity and geodiversity.

6.81 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.82 None identified.

Policy MBUL10 Security and safety

6.83 Policy MBUL10 requires plan-making authorities to work with a range of stakeholders to identify community safety needs, and the sites and policies required for their area to support provision of necessary infrastructure to maintain a safe and secure environment. The policy requires residential buildings of any height to meet the highest standard of fire safety and sets out what the design needs to do to meet this requirement and how it should be demonstrated in the planning application. These requirements will enhance safety and feelings of security while ensuring that risk factors are appropriately addressed by the built environment. Overall, Policy MBUL6 is expected to have a significant positive effect in relation to IIA objective 5: Health and community safety.

6.84 The policy requirement that development should consider and incorporate design measures to address safety, and security specifies that these should include measures for women, girls, and other vulnerable groups. This requirement will help promote equitable access to safe, inclusive and accessible open spaces, in particular for women, girls and other vulnerable groups. Therefore, Policy MBUL10 is expected to have a minor positive effect in relation to IIA objective 6: Equality of opportunity.

6.85 The fire safety requirements of Policy MBUL10 (which apply to residential development) restrict the use of combustible materials in external walls of developments. This requirement prevents the use of timber in external walls which is a sustainable material which can be used to reduce the CO₂ in the built fabric of development. Therefore, Policy MBUL10 is expected to have a minor negative effect in relation to IIA objective 7: Climate change.

6.86 Policy MBUL10 also prevents the use of green walls in development, which reduces opportunities to provide greening that improves biodiversity (and climate resilience). Therefore, Policy MBUL10 is expected to have a minor negative effect in relation to IIA objective 8: Biodiversity and geodiversity.

6.87 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.88 None identified.

Delivering the homes and neighbourhoods Londoners need

6.89 The section presents the appraisals of the following draft London Plan policies:

- Policy HN1 Increasing London's housing stock
- Policy HN2 Protecting and reshaping housing
- Policy HN3 Delivering affordable housing
- Policy HN4 Gypsy and Traveller accommodation
- Policy HN5 Managing specialist accommodation
- Policy HN6 Build to rent
- Policy HN7 Housing size mix
- Policy HN8 Housing design
- Policy HN9 Accessible housing
- Policy HN10 Burial space

6.90 The likely effects of the policies in relation to each IIA objective are shown in **Table 6.3** and described below the table.

Table 6.3: Likely effects of the 'Delivering the homes and neighbourhoods Londoners need' policies

IIA objective	Policy HN1	Policy HN2	Policy HN3	Policy HN4	Policy HN5	Policy HN6	Policy HN7	Policy HN8	Policy HN9	Policy HN10
IIA1: Best use of land and resources	++/-	+	0	0	0	0	0	0	0	+
IIA2: Housing	++/-	++	++	++	++	++	+	++?	++	0
IIA3: Economic potential	+	0	+	0	+	0	0	0	0	0
IIA4: Successful placemaking	0	0	+/-	0	0	0	0	++?	0	0
IIA5: Health and community safety	+	+	+	+	+	0	0	++	++	0
IIA6: Equality of opportunity	+	+	+	++	++	+	+	+	++	++
IIA7: Climate change	0	?	0	0	+	0	0	+	0	0
IIA8: Biodiversity and geodiversity	0	0	0	0	0	0	0	+	0	+
IIA9: Historic environment	0	0	0	0	0	0	0	0	0	0

Policy HN1 Increasing London's housing stock

6.91 Policy HN1 sets out ten year targets for net housing completions for each plan-making authority, who are responsible for identifying delivery options through the Local Plan process. It also requires plan-making authorities to positively plan for additional longer-term housing capacity over the 20 year plan period. The Local Plan policies need to be in line with Policy MBUL1 Spatial strategy, which seeks to make the best use of land by maximising intensification of the existing urban area and delivering as much of the required development as possible on brownfield land. However, in line with Policy MBUL1, some Local Plans will need to include site allocations and Green Belt release in identified Broad Locations for Growth. This will involve development of greenfield land, which is a less efficient use of land. Therefore, Policy HN1 is expected to have mixed significant positive and minor negative effects in relation to IIA objective 1: Best use of land and resources.

6.92 By setting ambitious housing delivery targets across London, Policy HN1 will help to facilitate the delivery of a significant amount of housing across the city. Increasing housing supply will also contribute to increased housing choice and affordability. Therefore, Policy HN1 is expected to have a significant positive effect in relation to IIA objective 2: Housing, mixed with a minor negative due to not meeting the full standard method requirement.

6.93 Increasing housing supply will have wider economic benefits. Setting clear targets for housing delivery will help to maintain the balance of housing and employment across the city. Without access to suitable housing, people may not be able to take up employment opportunities in London. The provision of sufficient new housing will also help contribute to London's economic competitiveness by enhancing the attractiveness of the city as a place to live and work. Therefore, Policy HN1 is expected to have a minor positive effect in relation to IIA objective 3: Economic potential.

6.94 Housing is a key determinant of health, and lack of access to secure and affordable housing can have detrimental impacts on well-being and health. Requiring Local Plans adopt and plan for the identified ten-year housing targets will help to ensure that additional housing is positively planning for and delivered at the local level. This could help to reduce health inequalities in the long term. Overall, Policy HN1 is expected to have a minor positive effect in relation to IIA objective 5: Health and community safety.

6.95 The provision of additional housing will help to meet the accommodation needs of different people, although the extent that different needs are provided for will be determined in combination with the other policies in the housing chapter (for

example, HN3 Delivering affordable housing, HN5 Managing specialist accommodation, HN7 Housing mix). Overall, the policy will help to secure adequate provision and distribution of housing to meet needs. Therefore, Policy HN1 is expected to have a minor positive effect in relation to IIA objective 6: Equality of opportunity.

6.96 The policy requires a significant increase in the quantum of housing across all plan-making authorities. The scale of housing development proposed in Policy HN1 has the potential to result in adverse effects in relation to IIA objectives 1: Best use of land and resources, 5: Health and community safety, 7: Climate change, 8: Biodiversity and geodiversity and 9: Historic environment. However, these effects are dependent on the location of development within the London boroughs, which will be determined through the Local Plan process. The overall spatial distribution and broad locations for growth have been appraised separately as part of the appraisal of Policy MBUL1: Spatial strategy above.

6.97 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.98 None identified.

Policy HN2 Protecting and reshaping housing

6.99 Policy HN2 resists loss of housing unless a scheme seeks to replace at least the existing floorspace and where possible, uplift existing densities, in line with Policy MBUL2 Optimising the use of land and site capacity. In supporting plot densification, it is expected to have a minor positive effect in relation to IIA objective 1: Best use of land and resources.

6.100 By resisting loss of housing floorspace of all types and tenures and requiring not only reprovision that aligns with need but for sites to 'do more' in terms of delivery, net additional homes should be achieved across all tenures. Ultimately this will support increased housing choice, whilst helping to maintain housing quality. In terms of affordable homes, requirements to maximise affordable floorspace and to ensure a like-for-like tenure replacement (in the case of estate regeneration), both protects existing tenants from price inflation and helps to facilitate a move back to any estate following redevelopment, as well as ensuring new homes for those awaiting affordable housing, as a result of the overall uplift in affordable numbers. The policy also contains a clause to incentivise affordable housing through allowing applicants to 'fast-track' through the planning process when certain affordable

requirements are met. Overall, this policy is expected to have a significant positive effect in relation to IIA objective 2: Housing.

6.101 Lack of access to secure and affordable housing can have detrimental impacts on well-being and health. By protecting existing floorspace and requiring an uplift if it is demolished, new homes will be affordable to those in need, which will inevitably help to reduce health inequalities (especially in the long-term) amongst a certain proportion of London's population. Affordable housing, especially when delivered as part of estate regeneration programmes, may also help to enhance connectivity between communities by ensuring a mix of socio-economic backgrounds live together. As such, Policy HN2 is considered likely to have a minor positive effect in relation to IIA objective 5: Health and community safety.

6.102 Increasing affordable housing in an area provides greater opportunity for connectivity between communities of different socio-economic backgrounds and may therefore help to foster inclusion and promote equality of opportunity. Ensuring a secure (affordable) base for more households might allow for greater participation in public life. Overall, the policy is expected to have a minor positive effect in relation to IIA objective 6: Equality of opportunity.

6.103 When considering demolition and replacement of affordable homes, the policy asks that a robust assessment is made of the benefits and disbenefits of alternative options in the first instance and that any potential benefits of redevelopment are made against wider social and environmental impacts. Although this does not preclude demolition and rebuild, it may result in instances where refurbishment is the preferred option instead, which could have more positive environmental benefits in terms of carbon emissions comparably. Although this possibility is noted, it is difficult to measure positive benefits which will vary drastically depending on the site in question and the refurbishment plans. As such, it is not certain that the policy will have positive impacts, and a likely but unknown effect is acknowledged against IIA objective 7: Climate change.

6.104 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.105 None identified.

Policy HN3 Delivering affordable housing

6.106 Policy HN3 seeks to maximise the delivery of affordable housing, including social rent and intermediate homes (of varying types and at a range of price points)

to contribute to meeting London's housing need, in the context of the housing and affordability crisis. It introduces a 'Threshold Approach to Planning Applications' which incentivises developers to meet affordable housing requirements by allowing them to experience a faster planning process with less scrutiny as a result. The policy is designed solely to increase housing choice and improve affordability to better align with Londoners' incomes, and to retain that alignment in future through capping affordability and eligibility criteria for intermediate housing (where the Mayor has control). The policy is therefore expected to have a significant positive effect in relation to IIA objective 2: Housing.

6.107 The London Growth Plan identifies a lack of housing across the city that people can afford as a barrier to economic growth. Without access to homes at suitable price points, proportions of the workforce will either opt or be forced to move from London or will not be able to take up posts in the first place, impacting both in and out migration flows. This affects jobs at all levels of the economy, but particularly in competitive markets (such as life sciences). Therefore, London risks losing out on qualified and skilled workers, tempering its ability to secure ongoing economic growth. Increased affordable housing – for social rent and intermediate rent and sale – is likely to have a minor positive effect in relation to IIA objective 3: Economic potential.

6.108 London is blighted by homelessness, and many families are living in temporary or unstable accommodation. It is arguable that successful places cannot be created without affordable housing provision and as such, the policy has a minor positive effect in relation to IIA objective 4: Successful placemaking. Conversely, particularly in current market conditions, funding affordable housing may impact other elements of a build that can make positive contributions to quality of place, such as community infrastructure provision, meaning a potential minor negative effect. Overall, the policy is expected to have mixed minor positive and minor negative effects in relation to IIA objective 4: Successful placemaking.

6.109 Lack of access to secure affordable housing can have detrimental impacts on well-being and health. Ensuring that a proportion of new homes in any new development will be affordable to those in need will help to reduce health inequalities (especially in the long-term) amongst a certain proportion of London's population. Affordable housing may also help to enhance connectivity between communities by ensuring a mix of socio-economic backgrounds live together. As such, Policy HN3 is expected to have a minor positive effect in relation to IIA objective 5: Health and community safety.

6.110 Provision of affordable housing is an enabler of overall site delivery. When sites come forward it is typical for the affordable element of the scheme to be built

first, securing funds from its sale that then drives forward the wider scheme. As such, and in terms of IIA objective 6: Equality of opportunity, affordable housing is an essential component of securing regeneration that reduces deprivation, both directly by bringing more affordable homes to an area, and indirectly by helping to secure regeneration itself. As discussed above, a range of affordable homes at different price points can help to foster inclusion between communities and can also promote equality of opportunity. Finally, ensuring a secure base for households might allow for greater participation in public life. Overall, the policy is expected to have a minor positive effect in relation to IIA objective 6: Equality of opportunity.

6.111 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.112 None identified.

Policy HN4 Gypsy and Traveller accommodation

6.113 Policy HN4 requires plan-making authorities to meet the accommodation needs of Gypsies, Travellers and Travelling Showpeople. The accommodation should be culturally suitable and according to the policy, plan-making authorities should also identify pitches in need of refurbishment. This will help ensure high-quality pitches and accommodation for Gypsies, Travellers and Travelling Showpeople. Therefore, Policy HN4 is expected to have a significant positive effect in relation to IIA objective 2: Housing.

6.114 Improved access to culturally appropriate accommodation for Gypsies, Travellers and Travelling Showpeople should help contribute to better health outcomes. Further to this, the policy requires development proposals for new sites to be well-connected to social infrastructure and healthcare, and contribute to a wider, inclusive neighbourhood. This will likely have positive effects on the health and well-being of Gypsies, Travellers and Travelling Showpeople. Therefore, the policy is expected to have a minor positive effect in relation to IIA objective 5: Health and community safety.

6.115 The policy will help secure culturally appropriate accommodation for groups protected under the Equality Act or otherwise disadvantaged. Meeting the accommodation needs of Gypsies, Travellers and Travelling Showpeople will therefore contribute towards equality. The policy could also have beneficial effects in terms of social cohesion, particularly if provided as part of large-scale residential and mixed-use allocations, as unauthorised sites can be a source of tension between

Traveller and settled communities. In addition, the policy requires pitch and site layouts, and the design of service blocks, to be accessible and adaptable to ensure they are suitable for all, including those with protected characteristics such as disabled and older people. Therefore, a significant positive effect is expected for Policy HN4 in relation to IIA objective 6: Equality of opportunity.

6.116 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.117 The GLA identified the following reasonable alternative options to Policy HN4 Gypsy and Traveller Accommodation:

- Option 1: Set out need figures for pitches instead of borough targets.

6.118 Rather than set borough targets for new pitches, Option 1 would set out need figures and leave the targets for boroughs to decide. This approach would be less likely to result in accommodation requirements being planned for and new pitches provided. The overall effects of Option 1 are likely to be the same as the effects for Policy HN4, but the significant positive effect against IIA objective 2: Housing would be to a lesser extent than under Policy HN4. This is because some boroughs may interpret this approach as them having more flexibility in setting their own targets. Policy HN4 was selected because it would be more likely to lead to pitches and plots being allocated in Local Plans and hence delivered.

Policy HN5 Managing specialist accommodation

6.119 Policy HN5 requires plan-making authorities to plan for and seek to meet the need for supported, specialist, students' and older persons' housing. This will help to offer greater choice of accommodation to meet Londoners' varied needs. The policy also requires plan-making authorities to identify if/where spatial concentrations of Purpose Built Student Accommodation (PBSA) or Large Scale Purpose Built Shared Living (LSPBSL) exist that could negatively impact on the ability to ensure mixed, inclusive neighbourhoods. This should enable plan-making authorities to manage delivery of student housing so that it does not impede delivery of conventional housing and support increased housing choice. Therefore, Policy HN5 is expected to have a significant positive effect in relation to IIA objective 2: Housing.

6.120 The policy takes a positive approach towards PBSA in suitable locations and requires plan-making authorities to allocate sites in line with the targets set out in policy. This will help to support the higher education sector which is an important

growth sector for London. Therefore, Policy HN5 is expected to have a minor positive effect in relation to IIA objective 3: Economic potential.

6.121 Policy HN5 directs plan-making authorities to identify opportunities for delivering Older Persons Accommodation in areas that are well-connected to local services, facilities, and social infrastructure by public transport. It also requires proposals for Older Persons Accommodation to ensure pick up and drop off facilities close to the principal entrance suitable for taxis, minibuses and ambulances. Ensuring accommodation is located close to local services and facilities could encourage social interaction and together with suitable drop off points ensure easy access to healthcare when needed. The policy also requires new purpose-built student accommodation and large-scale purpose-built shared living to be provided in locations well-connected to local services or, where relevant, Higher Education Providers, by walking, cycling and public transport. This will likely have positive effects on the health and well-being of residents by facilitating active travel and minimising pollution associated with the private car. Students' well-being will also benefit from journey times being minimised between their accommodation and university campus. Therefore, the policy is expected to have a minor positive effect in relation to IIA objective 5: Health and community safety.

6.122 Meeting supported, specialist and Older Persons Accommodation needs will contribute towards equality by helping to meet the accommodation needs of those whose needs are not met by general needs housing. The policy recognises that supported, specialist, and Older Persons Accommodation comprises many different types and formats of housing that can meet a wide range of needs and requires that development proposals for these types of accommodation be designed to satisfy the requirements of the intended residents. The policy also requires the design of large-scale purpose-built shared living to provide facilities and services that emphasise communal living and aim to remove barriers to social interaction and encourage engagement. The policy requires both PBSA and LSPBL to be carefully located, designed and managed to optimise their impact on neighbourhood mix. This could have beneficial effects in terms of social participation and community cohesion. Requiring affordable PBSA to be secured through a nominations agreement should help to facilitate participation in higher education among those who might otherwise not be able to afford it. Therefore, a significant positive effect is expected for Policy HN5 in relation to IIA objective 6: Equality of opportunity.

6.123 Locating accommodation near local services, facilities and social infrastructure in areas well connected by public transport may help minimise reliance on the private car and associated greenhouse gas emissions. Therefore, Policy HN5 is expected to have a minor positive effect in relation to IIA objective 7: Climate change.

6.124 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.125 The GLA identified the following reasonable alternative options to Policy HN5 Managing specialist accommodation:

- Option 1: Do not set borough level targets for PBSA.
- Option 2: Do not specify design quality and management requirements for LSPBSL schemes.

6.126 The overall effects of Option 1 are likely to be the same as the effects for Policy HN5. However, while the effects of Option 1 on IIA objective 2: Housing would be similar in terms of the overall number of new homes delivered, not setting borough targets for PBSA could make it harder to manage the delivery of student housing as plan-making authorities may not want to undermine the delivery of conventional homes. In the absence of targets, those boroughs which currently provide little or no PBSA may continue to do so. Therefore, mixed minor positive and minor negative effects is expected in relation to IIA objective 2. While Option 1 would retain an overall positive approach towards PBSA and therefore likely have a minor positive effect in relation to IIA objective 3: Economic potential, this would be to a lesser extent than Policy HN5.

6.127 The overall effects of Option 2 are likely to be the same as Policy HN5. However, there is a risk that LSPBL if poorly managed and designed inappropriately could result in sub-standard accommodation that does not serve residents well, in terms of either the private element of the accommodation or communal facilities. Therefore, minor negative effects are expected against IIA objectives 4: Successful placemaking, 5: Health and community safety and 6: Equality of opportunity. Policy HN5 was selected because it would make it more likely that overall policy aims would be met, including managing delivery of purpose-built student accommodation so that it does not undermine delivery of conventional homes and ensuring that purpose built shared living is designed and managed to an acceptable standard.

Policy HN6 Build to rent

6.128 According to Policy HN6, plan-making authorities may allocate sites for Build to Rent (BtR) development. BtR schemes are subject to a covenant to secure their operation as BtR over time, as well as a requirement to provide any affordable housing offer in perpetuity. This will help to diversify housing supply, as well as to diversify the sites themselves (increasing the likelihood of build out), and will

contribute to meeting affordable housing needs. In addition, the policy requires BtR developments to ensure service charge certainty for the period of the tenancy, helping to promote housing affordability by providing certainty about costs during the tenancy. Therefore, Policy HN6 is expected to have a significant positive effect in relation to IIA objective 2: Housing.

6.129 The affordable housing requirement of the policy is likely to help provide housing to a range of households with different incomes, given the rents that should be made available at different price points, in addition to policy clauses designed to provide household cost certainty over time. Therefore, Policy HN6 is expected to have a minor positive effect in relation to IIA objective 6: Equality of opportunity.

6.130 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.131 None identified.

Policy HN7 Housing size mix

6.132 Policy HN7 supports the delivery of a range of housing types and sizes taking into account London-wide and local evidence of need. This will contribute to increased housing choice that reflects the range of Londoners' needs. Further to this, the policy requires consideration of the contribution development proposals will make to ensuring mixed and inclusive neighbourhoods, having regard to the range of homes already present. This will ensure that strategic evidence on housing need is appropriately informed by local level considerations about housing choice. Overall, Policy HN7 is expected to have a minor positive effect in relation to IIA objective 2: Housing.

6.133 A minor positive effect is expected for Policy HN7 against IIA objective 6: Equality of opportunity. Providing a range of housing sizes in affordable housing that responds to evidence of strategic and local needs could help address existing poverty and inequality through more equitable housing. The wider strategic policy objective is designed to improve fluidity in the housing market, freeing up existing larger homes through downsizing effects.

6.134 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.135 None identified.

Policy HN8 Housing design

6.136 Policy HN8 Housing design requires all new residential development to meet the Nationally Described Space Standard. This will contribute to the quality of housing by ensuring minimal internal space requirements are met. Further to this, the policy seeks to maximise the provision of dual aspect dwellings to ensure homes have adequate passive ventilation, daylight and privacy – contributing to housing stock quality. Therefore, Policy HN8 is expected to have a significant positive effect in relation to IIA objective 2: Housing. The significant positive effect is uncertain, as the standards and criteria outlined in the policy could make development less viable and potentially limit housing delivery.

6.137 The policy requires activation of ground floor frontages, which will contribute to the creation of an attractive public realm and a potential increase in footfall, with more people walking, wheeling, cycling and socialising. Further to this, the policy requires the incorporation of good-quality and accessible playspace together with communal outside amenity space, which will contribute to the overall attractiveness and success of a place. Therefore, Policy HN8 is expected to have a minor positive effect in relation to IIA objective 4: Successful placemaking. The effect is uncertain, as the requirement in the policy to simplify the long-term maintenance of buildings and reduce costs through careful consideration of the choice of materials, could result in less quality materials being used.

6.138 The policy requires the Nationally Described Space Standard to be met, which would ensure people are not confined to small, uncomfortable dwellings that could have adverse effects on their wellbeing. In addition, maximising dual aspect dwellings and minimising single aspect dwellings will help ensure homes are ventilated and that people have privacy, while also avoiding overheating. This will have positive effects on people's physical health and mental wellbeing. The requirement that all habitable rooms should receive natural light and have openable windows will also contribute to people's wellbeing. The provision of good-quality and accessible playspace per child will encourage physical exercise in children, while communal outside amenity space that incorporates green space may also contribute to an increase in the number of outdoor recreational opportunities. The policy requirement for active ground floor frontages and open spaces to be overlooked will contribute to this effect in terms of protecting people's safety and feelings of safety. Therefore, Policy HN8 is expected to have a significant positive effect in relation to IIA5: Health and community safety.

6.139 The policy requires residential development, including outdoor amenity space, to be tenure-blind, which will help prevent segregation between different groups of people – including those with protected characteristics. In addition, provision is made for accessible playspace for children, ensuring those of a young age have good access to a stimulating environment and opportunities for exercise and recreation. The fact all individual dwellings will meet the National Described Space Standard will also contribute to promoting greater equality. Overall, Policy HN8 is expected to have a minor positive effect in relation to IIA objective 6: Equality of opportunity.

6.140 Policy HB8 seeks to maximise the provision of dual aspect dwellings and minimise the provision of single aspect dwellings so as to help avoid overheating. This is particularly important considering the urban heat island effect in London, which is forecast to worsen as a result of climate change. This part of the policy will help in terms of adaptation to climate change and therefore a minor positive effect is expected against IIA objective 7: Climate change.

6.141 A minor positive effect is expected for the policy against IIA objective 8: Biodiversity and geodiversity, as it requires communal outside amenity space incorporating green space to be provided as part of housing developments. This will contribute to biodiversity, although it is acknowledged that these spaces would most likely be used for recreational purposes which could potentially result in adverse effects on biodiversity. Therefore, the minor positive effect has some uncertainty.

6.142 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.143 None identified.

Policy HN9 Accessible housing

6.144 Policy HN9 supports the development of adaptable and accessible homes for Londoners and resists the loss of accessible housing in terms of floorspace and tenure. It sets accessible housing targets for all new residential development (including Purpose-Built Student Accommodation and large-scale purpose-built shared living) in London, which are higher than national requirements. The policy means that all new residential development should achieve step-free access to a dwelling's main entrance and supports an increase in the overall stock and quality of adaptable and accessible homes. This will contribute to increased housing choice that reflects the range of Londoners' needs. However, the policy could result in higher service charges due to the impacts from lifts, particularly on smaller

developments. Overall, Policy HN9 is expected to have a significant positive effect in relation to IIA objective 2: Housing.

6.145 The policy will support people's ability to stay living independently in their own homes for longer, therefore reducing pressures on the healthcare system and supporting people's access to social and community facilities. Requirements relating to noise performance levels will have beneficial effects on people's wellbeing. For major developments, the policy also supports an access professional being involved throughout the design process, which will help ensure design quality and compliance with the required standards. Therefore, the policy is expected to have a significant positive effect in relation to IIA objective 5: Health and community safety.

6.146 The provision of a sufficient amount of accessible housing will improve the quality of life of protected groups. Older people are more likely to be disabled or have age-acquired impairments or mobility impairments and are therefore more likely to require the design features provided by accessible housing. Many of the design standards and features contained within the accessible housing standards are of benefit to those with very young children, for example the provision of level access can assist when using a push chair or pram. The requirement for student accommodation to be wheelchair accessible is positive for younger people. The policy includes a marketing requirement to support the occupation of 'wheelchair user dwellings' by disabled people, which will help to ease competition for new homes. Improvements to acoustic standards for new residential development will positively impact disabled people, including some types of neurodiversity and mental health conditions. Therefore, the policy is expected to have a significant positive effect in relation to IIA objective 6: Equality of opportunity.

6.147 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.148 None identified.

Policy HN10 Burial space

6.149 Policy HN10 Burial Space requires plan-making authorities to plan proactively and collaboratively for the expansion, re-use and long-term provision of burial space, recognising cultural and faith needs. The positive sequential approach to identifying and allocating additional capacity that prioritises re-use and intensification of existing burial space, while addressing evidenced lack of capacity and faith needs will help to maximise the efficient use of scarce urban land while limiting the need for new land

take and helping to relieve capacity pressures in areas with acute shortage. While greenfield development is likely to be entailed with short term disruptive effects, overall cemetery development should be compatible with many landscape and biodiversity assets. Therefore, Policy HN10 is expected to have a minor positive effect in relation to IIA objective 1: Best use of land and resources.

6.150 Requiring plan-making authorities to recognise culture and faith need when planning for burial space London and supporting a more equitable distribution of burial provision across London supports inclusion by enabling culturally appropriate burial provision closer to communities, particularly for faith groups with specific requirements. Concentrating provision within established sites may reduce travel distances for mourners and funeral services, helping to limit traffic, emissions, noise and associated air quality impacts. In addition, the policy provides in principle support for development proposals that will increase provision, including for provision within one borough to meet the needs of faith groups from neighbouring boroughs experiencing burial space shortages. Therefore, a significant positive effect is expected in relation to IIA objective 6: Equality of opportunity.

6.151 The policy supports the retention and intensification of existing cemeteries and seeks to ensure that development proposals for both expansion of existing sites and new sites integrates with/supports local and strategic green infrastructure strategies. This could support wider environmental benefits, for example by helping to retain existing green spaces, protecting mature landscapes and habitats, and enabling them to continue functioning as multifunctional green infrastructure. Therefore, the policy is expected to have a minor positive effect in relation to IIA objective 8: Biodiversity and geodiversity.

6.152 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.153 None identified.

Growing London's economy in a way that benefits all

6.154 The section presents the appraisals of the following draft London Plan policies:

- Policy GLE1 Sufficient and appropriate employment space
- Policy GLE2 Supply of industrial land

- Policy GLE3 Data centres
- Policy GLE4 Night-time economy
- Policy GLE5 Culture and creative industries
- Policy GLE6 Visitor infrastructure
- Policy GLE7 Affordable workspace
- Policy GLE8 Access to employment and skills
- Policy GLE9 Aviation
- Policy GLE10 Safeguarded Wharves
- Policy GLE11 Circular economy
- Policy GLE12 Waste
- Policy GLE13 Aggregates and mineral resources

6.155 The likely effects of the policies in relation to each IIA objective are shown in **Table 6.4** and described below the table.

Table 6.4: Likely effects of the 'Growing London's economy in a way that benefits all' policies

IIA objective	Policy GLE1	Policy GLE2	Policy GLE3	Policy GLE4	Policy GLE5	Policy GLE6	Policy GLE7	Policy GLE8	Policy GLE9	Policy GLE10	Policy GLE11	Policy GLE12	Policy GLE13
IIA1: Best use of land and resources	++	++/-	+?	0	+	+	0	0	+	++/-	++	++	++
IIA2: Housing	0	+	0	0	0	+	0	0	0	0	0	0	0
IIA3: Economic potential	++	++	++	++	++	++	++	++	+/-	+	+	+	+
IIA4: Successful placemaking	+	0	0	0	++	+	+	0	0	0	0	0	0
IIA5: Health and community safety	+	0	-?	+	+	+	0	+	+	+/-	0	0	+
IIA6: Equality of opportunity	+	0	-?	+	+	+	++	++	+	0	0	0	0
IIA7: Climate change	-	+	+/-	0	+	+	0	0	++	+	++	+	+
IIA8: Biodiversity and geodiversity	0	0	0	0	0	0	0	0	0	-	0	0	+?
IIA9: Historic environment	0	0	0	+	0	0	0	0	0	0	0	0	0

Policy GLE1 Sufficient and appropriate employment space

6.156 Policy GLE1 makes best and most efficient use of land and resources by ensuring the delivery of sufficient and appropriate types of employment space to meet identified needs. It sets out design considerations to facilitate adaptation to future business and community needs, in addition to economic circumstances which will ensure efficient use of resources in the long-term. Policy GLE1 supports the use of planning conditions to maintain a balance of uses appropriate to an area which will help to make best and most efficient use of land. Therefore, Policy GLE1 is expected to have a significant positive effect in relation to IIA objective 1: Best use of land and resources.

6.157 Policy GLE1 stipulates that local policies should meet the diverse land and floorspace requirements for all economic uses by providing for a range of suitable business space of different types, sizes and price-points and informed by the London Growth Plan. It ensures that the design of commercial space is fit-for-purpose, inclusive and adaptable to changing economic circumstances. It supports the use of planning conditions to maintain a balance of uses appropriate to an area or to safeguard capacity for the intended uses such as social infrastructure, creative workspace or light industrial floorspace. In overall terms, Policy GLE1 is expected to have a significant positive effect in relation to IIA objective 3: Economic potential.

6.158 Policy GLE1 promotes well-served mixed use places by meeting the diverse land and floorspace requirements for all economic uses by providing for a range of suitable business space having regard to the needs of SMEs, larger firms and third sector organisations. Planning conditions may be used to maintain a balance of uses appropriate to an area or to support the retention of particular uses such as social infrastructure and creative workspace which may be vulnerable to loss to other uses. In this context, Policy GLE1 is expected to have a minor positive effect in relation to IIA objective 4: Successful placemaking.

6.159 The policy includes clauses to deliver a growing, diverse and inclusive economy by providing for the land use and floorspace needs of all economic sectors including those identified in the London Growth Plan. Providing sufficient and appropriate employment space supports job creation which, in turn, can help to support positive outcomes in employment which is one of the wider determinants of health. Therefore, Policy GLE1 is expected to have a minor positive effect in relation to IIA objective 5: Health and community safety.

6.160 There is evidence that developments can sometimes result in the displacement of existing small and independent business uses including some that are owned or run by Black, Asian and minority ethnic Londoners and/or by third sector, not-for-

profit and social enterprises [See reference 16]. Policy GLE1 stipulates that developments that result in the potential displacement of existing small and independent business uses should either re-provide such space in the development where feasible and appropriate, and/or work with the borough to ensure that appropriate relocation options are available. Policy GLE1 includes a clause that planning conditions restricting changes in economic or social infrastructure uses may be used in circumstances where they are justified and necessary to safeguard capacity for the intended uses including social infrastructure. Ensuring that there is a sufficient supply of social infrastructure of different types can be important for many people who share protected characteristics for them to be able to access different services and activities. This includes protected characteristics related to age (younger and older people), disability, gender reassignment, people with different gender identities, sex, pregnancy and maternity, parents and carers, race, religion or belief, and sexual orientation. In this context, Policy GLE1 is expected to have a minor positive effect in relation to IIA objective 6: Equality of opportunity.

6.161 Ensuring a sufficient supply of employment space to meet identified needs in London could result in an increase in CO₂ emissions through new development and operations. Many employment uses are typically located in sustainable locations that are well-connected by public transport such as the CAZ, Northern Isle of Dogs, town centres and high streets helping to minimise carbon emissions from transport. Some uses however, such as industrial, storage and distribution uses, are typically located in areas that are better connected to the strategic road network, and which may have a higher proportion of private vehicle movements. Policy GLE1 is expected to have a minor negative effect in relation to IIA objective 7: Climate change.

6.162 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.163 None identified.

Policy GLE2 Supply of industrial land

6.164 This policy steers the provision of industrial land towards the most suitable locations with good freight transport access within strategic industrial property market areas and sets out what uses should be supported on designated industrial land. By seeking to re-activate vacant industrial land, re-purpose any arising surplus land in industrial use and supporting industrial intensification in appropriate locations, the policy supports the reuse of previously developed land and densification at both the plot and neighbourhood level for priority land uses in the local area. This is an

efficient use of land. However, in limited circumstances where required to meet storage and distribution benchmarks, plan-making authorities may consider strategic scale-release of Green Belt land for industrial purposes. This may result in a loss of greenfield land and could risk the loss of land of high environment value including higher-grade agricultural land or areas with green infrastructure or biodiversity value. Overall, the policy is expected to have mixed significant positive and minor negative effects in relation to IIA objective 1: Best use of land and resources.

6.165 This policy supports the release of designated industrial land for housing under certain circumstances, with reference to Policy PV5. It also encourages industrial intensification in appropriate locations, which may free up land for housing. Therefore, the policy is expected to have a minor positive effect in relation to IIA objective 2: Housing.

6.166 The policy directs plan-making authorities to proactively designate new industrial areas to help meet their strategic and local needs and requires compensation for any release to be within the same property market area. Focusing industrial uses towards designated industrial areas and restricting other land uses means that industrial uses will be able to operate effectively and with fewer constraints than if they were located in close proximity to sensitive uses. It also sets out strategic benchmarks for storage and distribution uses, on which London's businesses depend. These requirements will have a substantial effect on the growth of London's businesses by increasing the supply of land available for industrial uses to meet future demand for industrial uses, such as logistics and freight, that are critical to London's economy. The consideration of property market areas and the setting of benchmarks at this geography will further support delivery of a diversity of industrial space in locations that respond to sectoral needs. Therefore, the policy is expected to have a significant positive effect in relation to IIA objective 3: Economic potential.

6.167 The policy steers industrial land towards locations with good freight transport access, including water and rail, minimising freight vehicles travelling through residential or town centre areas and supporting the use of lower-emission options for moving goods. This will contribute to a reduction in greenhouse gas emissions and therefore Policy GLE2 is expected to have a minor positive effect in relation to IIA objective 7: Climate Change.

6.168 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.169 The GLA identified the following reasonable alternative options to Policy GLE2 Supply of Industrial Land:

- Option 1: Set lower strategic benchmarks for storage and distribution.
- Option 2: Steer Class Eg(ii) and Eg(iii) uses away from designated industrial areas to free up more space for storage and distribution (Class B8).

6.170 Option 1 is likely to have the same effects as Policy GLE2. However, it could exacerbate the shortage of land to accommodate key industrial uses. Therefore, it is expected to have a minor positive effect in relation to IIA objective 3: Economic potential.

6.171 Storage and distribution uses have high forecast demand and Option 2 could increase the supply of these uses, therefore contributing more towards the significant positive effect against IIA objective 3: Economic potential. However, it could lead to a minor negative effect on IIA objective 4: Successful placemaking through the removal of Class E uses that tend to enhance the public realm within those designated industrial areas. Policy GLE2 was selected because an adequate storage and distribution benchmark is required to ensure that sufficient industrial land is planned, and the integration of Eg(ii) and Eg(iii) uses into industrial areas is also important to facilitate improving their public realm.

Policy GLE3 Data centres

6.172 Policy GLE3 requires plan-making authorities to meet the need for data centres by proactively identifying suitable locations that take into account the availability of land, electricity and water supply capacity without compromising the supply of these required to meet local housing, employment and other infrastructure needs. The policy also seeks to manage the high energy and water use requirements of data centres by requiring efficiency measures and waste heat utilisation to minimise the use of resources in operation. While the locational criteria in the policy direct data centre development to brownfield land in the first instance, where no suitable brownfield sites are available, data centres may potentially be supported in the grey belt or on the edge of Broad Locations for Growth in the Green Belt. Overall, Policy GLE3 is expected to have a minor positive effect in relation to IIA objective 1: Best use of land and resources, with some uncertainty.

6.173 While the job densities of data centres tend to be low, they support a wide range of data-driven economic growth sectors which are important for London's economy, and the requirement to proactively identify suitable locations will provide

for the spatial needs of data centres. The policy requirements will help to balance the spatial needs of different growth sectors and could help to address barriers to economic participation. For example, the policy requires suitable locations to not compromise employment needs that depend on freight transport infrastructure and recognises the potential for Community Infrastructure Levy contributions to help deliver mitigation of adverse impacts on affected communities. Therefore, Policy GLE3 is expected to have a significant positive effect in relation to IIA objective 3: Economic potential.

6.174 Although there have been improvements to air quality, there are still parts of the city that exceed UK legal limits for NO₂ and most of the city still exceeds WHO air quality guidelines. Because data centres include back-up power diesel generators, this can create air pollution with adverse impacts on people's health. To help to mitigate the air quality impacts of back-up power, the policy requires the approach to back up power to demonstrate with reference to latest best practice that the lowest emission engines and fuels available are used to minimise overall air quality impacts. While the impacts of poor air quality on health are well documented, because of the policy focus on generators that minimise harmful emissions, the minor negative effect in relation to IIA objective 5: Health and community safety has some uncertainty.

6.175 Children, women who are pregnant, older people and those with existing health conditions are particularly vulnerable to the effects of air pollution, in addition to poorer and Black, Asian and minority ethnic communities who are more likely to live in areas with poorer air quality. While the policy seeks to mitigate the effects of data centres, the scale of development required is still likely to have adverse effects in terms of air pollution. Therefore, a minor negative effect with some uncertainty is also expected in relation to IIA objective 6: Equality of opportunity.

6.176 The policy seeks to reduce the impact of all development proposals for data centres on the environment by promoting the use of a range of environmental measures including heat recovery, mitigation requirements in terms of electricity and water efficiency, on-site renewable energy sources and the lowest-emission engine and fuels available for back-up power. These requirements will help to promote climate resilience, reduce CO₂ emissions and mitigate heat issues caused by new data centres. However, there is still likely to be some CO₂ emissions generated through the construction and operation of new data centres. Overall, therefore, Policy GLE3 is expected to have a mixed minor positive and minor negative effect in relation to IIA objective 7: Climate change.

6.177 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.178 None identified.

Policy GLE4 Night-time economy

6.179 Policy GLE4 requires plan-making authorities to plan for growth in the night-time economy and nightlife. The policy also seeks to enhance support for businesses and investment in London's night-time economy and prevent the encroachment of sensitive land uses into night-time areas. This will boost the economy across several sectors such as hospitality, culture, nightlife and events which are integral to London's night-time economy and London's position as a world class 24-hour city. Therefore, Policy GLE4 is expected to have a significant positive effect in relation to IIA objective 3: Economic potential.

6.180 The policy requires proposals for sensitive uses to be designed from the outset to minimise and mitigate any identified or potential nuisances generated by nearby existing and permitted night-time uses, in line with the agent of change principle. This will ensure London-wide night-time activities can thrive without negatively affecting the health and wellbeing of Londoners. Therefore, Policy GLE4 is expected to have a minor positive effect in relation to IIA objective 5: Health and community safety.

6.181 The policy requires major developments to provide safe and inclusive spaces designed for all and supports the introduction and retention of facilities for night workers as well as users, with particular consideration given to race, sex, age and disability. This ensures that areas of night-time activity foster participation in public life at night and inclusion and integration of different communities, including those with protected characteristics. Pubs also play an important role in bringing people together and meeting the needs of particular communities. By protecting pubs that provide a social, heritage, cultural or economic value, Policy GLE4 is likely to benefit certain groups who may particularly value these spaces as safe and welcoming spaces that they can access without fear of discrimination or harassment. Therefore, Policy GLE4 is expected to have a minor positive effect in relation to IIA objective 6: Equality of opportunity.

6.182 The application of Policy GLE4 insists on the retention of public houses where they have a heritage or cultural value. This means that pubs continue to contribute to the character of local areas. Therefore, Policy GLE4 is expected to have a minor positive effect on IIA objective 9: Historic Environment.

6.183 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.184 None identified.

Policy GLE5 Culture and creative industries

6.185 Policy GLE5 supports the use of vacant properties and land for pop-ups or meanwhile uses for cultural and creative activities. This is an efficient use of land, albeit temporary. Therefore, Policy GLE5 is expected to have a minor positive effect in relation to IIA objective 1: Best use of land and resources.

6.186 The policy requires major development to protect existing cultural facilities and creative uses and re-provide at least an equivalent amount of cultural space should it be lost during development. Therefore, it helps to address the important contribution of cultural consumption and cultural production in London's experience economy and economy as whole. Therefore, Policy GLE5 is expected to have a significant positive effect in relation to IIA objective 3: Economic potential.

6.187 Policy GLE5 requires plan-making authorities to protect and promote new and existing cultural uses and distinct cultural clusters. The policy works to improve the vibrancy of the CAZ, town centres and high street centres while assisting regeneration and promoting a diverse offer for a variety of different community users. Protecting and promoting such uses will help increase and maintain London's world class cultural offer. Therefore, Policy GLE5 is expected to have a significant positive effect in relation to IIA objective 4: Successful placemaking.

6.188 The policy states that major development containing cultural consumption uses should be supported in places with good public transport connectivity; this supports a reduced reliance on private car use to access such developments and its associated uses whilst mitigating impacts of air pollution on local people. This is particularly helpful to those who may be vulnerable to air pollution, such as those who suffer from asthma. Therefore, Policy GLE5, is expected to have a minor positive effect in relation to IIA objective 5: Health and community safety.

6.189 As well as helping to promote social integration by bringing different communities together, culture also has a particular role to play in helping to tackle social isolation. Ensuring that valued cultural uses are protected and new uses promoted can be important for many people who share protected characteristics. Places with good public transport activity could influence equality of access to cultural facilities, as those with protected characteristics may rely on such modes of transport to access the wide range of cultural activities and facilities on offer across

London. Therefore, Policy GLE5 is expected to have a minor positive effect in relation to IIA objective 6: Equality of opportunity.

6.190 The policy refers to good public transport connectivity. Use of public transport instead of reliance of cars to engage with London's cultural offer aids climate change mitigation by reducing use of the private car and associated greenhouse gas emissions. Therefore, Policy GLE5 is expected to have a minor positive effect in relation to IIA objective 7: Climate change.

6.191 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.192 None identified.

Policy GLE6 Visitor infrastructure

6.193 Policy GLE6 makes best and most efficient use of land and resources by promoting the sustainability of London's visitor economy during the day and night. It supports new and existing visitor attractions, legibility, visitor experience and management, visitor accommodation and other supporting infrastructure in locations that are well-connected and accessible by public transport, walking, wheeling and cycling. It also supports the intensification of the provision of serviced visitor accommodation in appropriate locations, which is an efficient use of land. Therefore, Policy GLE6 is expected to have a minor positive effect in relation to IIA objective 1: Best use of land and resources.

6.194 Policy GLE6 supports the intensification of serviced visitor accommodation provision where it would not lead to negative impacts on housing supply. It also stipulates that development proposals for short-term let visitor accommodation (which exceed national policy permitted time limits) should be refused where they have a negative impact on the housing stock or local housing need. In this context, Policy GLE6 is expected to have a minor positive effect in relation to IIA objective 2: Housing.

6.195 The policy aims to strengthen London's role as a world-leading visitor destination and to spread the economic benefits of tourism across the city in line with the London Growth Plan. It promotes London's visitor economy during the day and night and supports the development of new and existing visitor attractions, legibility, visitor experience and management, visitor accommodation and other supporting infrastructure. Development of serviced visitor accommodation is supported in the Central Activities Zone (CAZ), town centres, high streets and other locations that are

well-connected by public transport. Therefore, Policy GLE6 is expected to have a significant positive effect in relation to IIA objective 3: Economic potential.

6.196 Policy GLE6 promotes well-served mixed use places by promoting the provision of new visitor attractions and serviced accommodation in locations that are well-connected by sustainable modes of transport, including existing mixed-use locations such as the CAZ and town centres. It supports improvements to visitor experience and other supporting infrastructure including the public realm. The intensification of serviced visitor accommodation is supported in well-connected locations where it would not lead to negative impacts on local amenity. In this context, Policy GLE6 is expected to have a minor positive effect in relation to IIA objective 4: Successful placemaking.

6.197 Provision and concentrations of short-term let visitor accommodation can give rise to concerns related to local amenity and noise in existing residential areas. Policy GLE6 includes a clause which stipulates that development proposals for short-term let visitor accommodation (which exceed national policy permitted time limits) should be refused where they have a negative impact on local amenity. The policy also promotes new and existing visitor attractions, visitor accommodation and other supporting infrastructure in locations that are well-connected by sustainable modes, reducing the risk of increasing air pollution and road danger through an increase in private vehicle use. Therefore, Policy GLE6 is expected to have a minor positive effect in relation to IIA objective 5: Health and community safety.

6.198 Improving the availability of accessible serviced accommodation is vital to ensuring that all visitors can stay in London and experience its visitor offer. Policy GLE6 ensures sufficient choice for people who require an accessible bedroom and requires provision of either 10% of new bedrooms to be wheelchair-accessible or 15% of new bedrooms to be accessible rooms. These requirements recognise the need not only for standard wheelchair accessible rooms, but also rooms suitable for people with ambulant mobility impairments or older people who could benefit from additional access features, as well as rooms suitable for people who require assistance or need to be near to a carer. Policy GLE6 also stipulates that Local Plans should promote the inclusive access of London's visitor economy during the day and night including the provision of public toilets and accessibility by walking, wheeling and cycling. This will help address the needs of people who share protected characteristics including age (especially older people), disability, sex (women), pregnancy and maternity, parents and carers. Therefore, Policy GLE6 is expected to have a minor positive effect in relation to IIA objective 6: Equality of opportunity.

6.199 Policy GLE6 stipulates that Local Plans should promote the sustainability of London's visitor economy during the day and night. It promotes new and existing

visitor attractions, visitor accommodation and other supporting infrastructure in locations that are well-connected by sustainable modes, reducing the risk of increasing CO₂ emissions associated with private vehicle use. Therefore, Policy GLE6 is expected to have a minor positive effect in relation to IIA objective 7: Climate change.

6.200 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.201 The GLA identified the following reasonable alternative options to Policy GLE6 Visitor infrastructure:

- Option 1: Support visitor accommodation in the CAZ and town centres as a first priority, removing references to other non-town centre locations that are well-connected by public transport.
- Option 2: Support visitor accommodation in locations close to existing large-scale visitor attractions and airports.

6.202 Option 1 may miss opportunities to spread the benefits of economic growth and visitor accommodation to all parts of the capital and so although a significant positive effect would still be expected in relation to IIA objective 3: Economic potential, it would be to a lesser extent than Policy GLE6. Option 1 may also help to support positive effects in relation to IIA objective 4: Successful placemaking by supporting well-served mixed-use places in the CAZ and town centres. Therefore, Option 1 is expected to have a minor positive effect in relation to IIA objective 4.

6.203 Option 2 would extend the range of locations suitable for visitor accommodation and so may benefit those visitor attractions and airports by providing convenient overnight accommodation for visitors. It is therefore expected to have a significant positive effect in relation to IIA objective 3: Economic potential. However, this option could lead to less sustainable patterns of development if the visitor accommodation was not in the CAZ, town centres or a location that is well-connected by public transport. Less sustainable patterns of development can increase private car use and associated greenhouse gas emissions, with adverse effects on health. Therefore, Option 2 could have significant negative effects in relation to IIA objectives 1: Best use of land and resources, 5: Health and community safety and 7: Climate change. This option could also dilute the potential to support well-served mixed-use locations in the CAZ and town centres, resulting in a minor positive effect on IIA objective 4: Successful placemaking, but to a lesser extent than Policy GLE6. Policy GLE6 was selected because it supports opportunities to spread the benefits of

growth in the visitor economy and serviced visitor accommodation in sustainable locations across the capital.

Policy GLE7 Affordable workspace

6.204 The policy supports the delivery of affordable workspace for economic development purposes, such as specific uses that contribute towards economic activity in the Central Activities Zone and town centres, and for Londoners to start-up and run a business. It also addresses an important barrier to entry for many businesses which is the relatively high cost of business space in London. The policy stipulates that Local Plan policies are subject to evidence of need and viability, ensuring that affordable workspace policies and implementation do not undermine the delivery of new economic development. Therefore, Policy GLE7 is expected to have a significant positive effect in relation to IIA objective 3: Economic potential.

6.205 The policy supports the provision of affordable workspace either on-site or off-site to help sustain a mix of uses, which can contribute to the character of an area, and to support the shared use of facilities. It also seeks to protect existing affordable workspace through re-provision of at least an equivalent amount. This will help to secure successful mixed-use places. The policy also recognises that off-site provision and payments in lieu may be particularly suitable for data centre and B8 storage, or distribution development, and to secure greater benefits such as affordable workspace contributions from new Class Eg(i) office development in certain prime locations in the CAZ or to support communal off-site affordable workspace hubs, which can also support positive placemaking. Therefore, Policy GLE7 is expected to have a minor positive effect in relation to IIA objective 4: Successful placemaking.

6.206 The policy supports the delivery of affordable workspace for a range of social, cultural or economic purposes. This includes for disadvantaged or under-represented groups and sectors with cultural, educational and social value. This will help to ensure inclusive access to economic opportunities, including for people with protected characteristics. The policy also supports educational outcomes through connections to schools, colleges or higher education which will have positive equalities impacts related to another protected characteristics group: age (younger people). Therefore, Policy GLE7 is expected to have a significant positive effect in relation to IIA objective 6: Equality of opportunity.

6.207 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.208 The GLA identified the following reasonable alternative options to Policy GLE7 Affordable workspace:

- Option 1: Limit the range of uses that can be delivered as affordable workspace to just Class E(g), B8 and data centres (this is the same as the 'trigger' uses).
- Option 2: Insist that affordable workspace is always provided on-site.

6.209 Option 1 supports the delivery of affordable workspace for a narrower range of economic uses compared to Policy GLE7. Therefore, Option 1 is expected to have a minor positive effect in relation to IIA objective 3: Economic potential. By supporting affordable business space, the option would result in a minor positive effect in relation to IIA objective 4: Successful placemaking. However, this would be to a lesser extent than under Policy GLE7 as it would limit the range of affordable uses that could contribute to successful placemaking. Further to this, Option 1 would likely result in a minor positive effect in relation to IIA objective 6: Equality of opportunity as it would remove opportunities to deliver uses such as food and drink, retail, health facilities, crèches, community uses and/or cultural-related sui generis employment uses, which have beneficial equalities impacts.

6.210 Option 2 would likely have a minor positive effect in relation to IIA objective 4: Successful placemaking, as it helps to sustain a mix of uses which can contribute to the character of an area. Providing affordable workspace on-site can derive economic benefits through networking and knowledge sharing. Conversely, an on-site-only policy that requires a percentage of total workspace to be affordable space, could (in the case of smaller developments) result in very low amounts of on-site affordable workspace that do not meet the needs of potential workspace operators or occupiers. Therefore, Option 2 is expected to have a mixed minor positive and minor negative effect in relation to IIA objective 3: Economic potential. Insisting that provision is on-site could also result in lost opportunities to secure a positive effect in relation to IIA objective 6: Equality of opportunity, including through affordable workspace contributions that would otherwise support larger, better resourced and communal affordable workspace hubs in alternative off-site locations. Policy GLE7 was selected because it supports a wide range of affordable uses that can contribute to successful placemaking and beneficial equalities impacts.

Policy GLE8 Access to employment and skills

6.211 Policy GLE8 requires major development proposals to secure good quality employment and training opportunities for Londoners during the construction of the development and in the completed final use (when for employment uses). This will

likely have positive effects on Londoners' access to economic participation and progression. Therefore, Policy GLE8 is expected to have a significant positive effect in relation to IIA objective 3: Economic potential.

6.212 Access to good quality employment and skills is one of the wider determinants of good health, and by supporting Londoners into work, skills, training and apprenticeships, Policy GLE8 is expected to have a minor positive effect in relation to IIA objective 5: Health and community safety.

6.213 The policy seeks to secure training, apprenticeship and employment opportunities for Londoners currently out of work or under-employed, and to increase underrepresented groups within the construction industry and other relevant sectors through the use of planning obligations. This will likely help minimise disadvantages, including for groups with protected characteristics such as women, disabled people, Black, Asian and minority ethnic groups, younger, older and LGBTQ+ Londoners, Gypsies and Travellers, carers and migrants, and support greater participation in London's workforce. Therefore, Policy GLE8 is expected to have a significant positive effect in relation to IIA objective 6: Equality of opportunity.

6.214 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.215 None identified.

Policy GLE9 Aviation

6.216 Policy GLE9 requires London's six main airports to make the best use of existing capacity which could facilitate increased economic activity through aviation, while still allowing the land that might have been used for expansion to be used for other purposes such as housing, commercial development, open space, or biodiversity gain. The policy may also help reduce negative externalities of airport related developments by refusing expansions unless environmental impacts are effectively addressed and by requiring growth to be supported by public transport, walking and wheeling for passengers, staff and freight. The advance air mobility (AAM) part of the policy – which includes drones and electric vertical take off and landing vehicles – requires proposals to assess the opportunity cost of land use and cumulative impacts of the spatial distribution of AAM sites. This assessment will likely consider existing and proposed sites for AAM to avoid concentrations of such activity that could take away land and resources from housing, offices or green infrastructure. This will likely ensure efficient use of land, reduce negative impacts on

people and the environment, and enable local people to access jobs. Therefore, Policy GLE9 is expected to have a minor positive effect in relation to IIA objective 1: Best use of land and resources.

6.217 The policy requirement to make the best use of existing capacity at London's six main airports to ensure sustainable economic growth and jobs for local communities is expected to improve the economic potential of the aviation industry and economic participation of local communities. Refusal of proposals for airport expansion due to their environmental impacts might curb some economic potential, but the focus on environmentally sustainable economic growth and using existing capacity to the fullest extent will create climate resilient and more equitable economic growth. Therefore, Policy GLE9 is expected to have a mixed minor positive and minor negative effect in relation to IIA objective 3: Economic potential.

6.218 The policy requires proposals to demonstrate sustainable surface access to London's six main airports via public transport, walking, wheeling and cycling. This will likely help tackle traffic congestion by reducing the number of private vehicles on the road, in addition to poor air quality. Further to this, proposals for AAM should be assessed on principles of safety, security and public health, including noise, privacy and visual disturbance. The policy ensures the right principles for health and community safety are in place while allowing for innovative technology. Therefore, Policy GLE9 is expected to have a minor positive effect in relation to IIA objective 5: Health and community safety.

6.219 The policy requires that benefits related to aviation proposals, including from regulatory and technological improvements that could allow for more flights without additional environmental footprint, are fairly shared with local and affected communities. Further, for AAM proposals, the policy sets out principles that focus on equity, accessibility, economic and social value against which proposals should be assessed. This will likely help to reduce disadvantages and support greater participation in London's workforce. Therefore, Policy GLE9 is expected to have a minor positive effect in relation to IIA objective 6: Equality of opportunity.

6.220 The policy discourages an increase in aviation activity, including refusal of airport expansions, new heliports or shifts in the mix of operations in other airports. This is to ensure that net zero targets are achieved and any environmental impacts relating to additional greenhouse gas emissions are effectively addressed. The requirement in the policy to contribute toward sustainable surface access will help to ensure that any additional trips are through public transport, walking and wheeling, further reducing transport-related carbon emissions. While proposals for airport expansions are determined through the Airport National Policy Statement decision-making framework, this London Plan policy will be a material consideration by the

Secretary of State in the Development Consent Order process. Therefore, Policy GLE9 is expected to have a significant positive effect in relation to IIA objective 7: Climate change.

6.221 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.222 None identified.

Policy GLE10 Safeguarded wharves

6.223 Policy GLE10 requires plan-making authorities to ensure sufficient wharf capacity in London to meet the identified need for waterborne freight handling capacity. In addition to defining boundaries of safeguarded wharves and supporting opportunities for new/expanded wharves, where there are clear deficiencies in wharf capacity boroughs should explore opportunities to provide that. Where consolidation of wharves is proposed to optimise brownfield first development, boroughs should ensure that compensatory capacity is provided within the sub region. This will ensure that the network of sites safeguarded for waterborne freight uses is protected while supporting re-use of previously developed land and optimisation of sites/surrounding areas for complementary land uses. However, an increase in the amount of freight transported on London's waterways could compromise the quality of water and have a detrimental impact on the habitat of local importance and species within and alongside the water. Overall, Policy GLE10 is expected to have a mixed significant positive and minor negative effect in relation to IIA1: Best use of land and resources.

6.224 Safeguarding provision for waterborne freight handling capacity will help to ensure a steady and adequate supply of different commodities into London including construction materials, metals, petroleum products and chemicals, among others. This helps to drive London's economy by sustaining a diversity of economic activity and reducing congestion on London's roads. The policy stipulates that the loss of safeguarded wharves will only be supported where there is adequate compensatory capacity in the same property market area/wharf sector or evidence demonstrates the wharf is no longer viable, ensuring that the spatial needs for waterborne transport to support specific market sectors will continue to be met. Therefore, Policy GLE10 is expected to have a minor positive effect in relation to IIA objective 3: Economic potential.

6.225 The policy requires development proposals on safeguarded wharves to make the best use of the wharves' capacity and locations. Maximising the movement of

goods by water, which has lower air pollutants like NO_x and particulate matter than road transport, reduces poor air quality and the negative health impacts associated with it. Conversely, the policy also requires that wharf activity should be able to function 24/7 which can produce air and noise pollution. Human exposure to these types of nuisances can have a detrimental impact on people's health. Therefore, the policy is expected to have mixed minor positive and minor negative effects in relation to IIA objective 5: Health and community safety.

6.226 Water transport offers a considerably lower-emission option for moving goods than road transport, and an increased movement of goods by waterborne freight could reduce higher carbon emission road traffic – especially that associated with long-distance, bulk transport. Therefore, Policy GLE10 is expected to have a minor positive effect in relation to IIA objective 7: Climate change.

6.227 The use of the river for freight transport purposes could negatively impact water and soil quality and the surrounding natural environment by introducing pollution from increased transport activity and development on the waterways. An increase in the amount of freight transported on London's waterways could compromise the quality of water and have a detrimental impact on the habitat of local importance and species within and alongside the water. Therefore, Policy GLE10 is expected to have a minor negative effect in relation to IIA8: Biodiversity and geodiversity.

6.228 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.229 None identified.

Policy GLE11 Circular economy

6.230 Policy GLE11 seeks to ensure that the proposed development is designed and constructed to reduce material demands and ensure that waste is managed up the waste hierarchy. As such, the application of this policy will seek to ensure that materials and/or buildings are kept at their highest value for as long as possible. Therefore, a significant positive effect is expected for Policy GLE11 in relation to IIA objective 1: Best use of land and resources.

6.231 The policy encourages new circular economy infrastructure, including as a meanwhile use. As identified within the Circular Economy Infrastructure Report (July 2025) which informed this policy, there are different ways in which the delivery of circular economy infrastructure can occur within London, including through innovation

incubator. The provision of some circular economy facilities could support the creation of jobs, albeit likely to be small in scale. Therefore, a minor positive effect is expected for Policy GLE11 in relation to IIA objective: Economic potential.

6.232 Policy GLE11 promotes low carbon construction through incorporating circular economy principles into site design and construction. This includes through undertaking a pre-demolition and pre-redevelopment audit to establish whether any existing site material and/or buildings can be reused within the new development. The reuse of existing materials can support a reduction in CO₂ through reducing the need to produce new carbon intensive materials. A significant positive effect is therefore expected for Policy GLE11 in relation to IIA objective 7: Climate change.

6.233 The policy is not likely to have an effect on any other IIA objectives.

Reasonable alternatives

6.234 None identified.

Policy GLE12 Waste

6.235 Policy GLE12 requires plan-making authorities to ensure that they have sufficient provision to manage their apportioned tonnages of materials and waste, and other identified waste needs. This, coupled with the protection of waste sites through the requirement for compensatory capacity should a waste site be proposed to be released for other uses (and has not been identified for release within an adopted waste plan), will support London moving towards net self-sufficiency. Further to this, the policy promotes waste management practices in line with the waste hierarchy. Therefore, Policy GLE12 is expected to have a significant positive effect in relation to IIA objective 1: Best use of land and resources.

6.236 Waste sites offer a source of employment within London. As such, the protection of waste sites, supporting new waste sites and increasing waste management capacity at existing sites, will provide some job opportunities. Therefore, Policy GLE12 is expected to have a minor positive effect in relation to IIA objective 3: Economic potential.

6.237 Policy GLE12 requires new waste management sites or increased waste management capacity at existing sites to contribute towards the delivery of a circular economy. The policy also seeks to ensure that waste is managed up the waste hierarchy. The application of these approaches, which seeks to reuse materials, can support a reduction in emissions associated with the extraction and processing of raw materials. Further, when identifying waste sites and capacity to meet

apportionment, the policy also encourages the boroughs to consider locations close to safeguarded wharves and railheads, which could help reduce transport-related impacts, which would include carbon emissions, associated with the movement of waste. As such, the proposed policy will have a minor positive effect in relation to IIA objective 7: Climate change.

6.238 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.239 None identified.

Policy GLE13 Aggregates and mineral resources

6.240 Policy GLE13 supports the safeguarding of a steady and adequate supply of land-won aggregates within London up to 2050 based on apportionments to four boroughs. This will support the growth and development of London, particularly given London's construction needs as demand for aggregates is likely to increase over this period. The policy supports making the best use of land by safeguarding scarce materials that will support London's continued growth. Further to this, it deters hydraulic fracturing which can otherwise result in contamination of water supplies. Therefore, the policy will also help protect water quality. Overall, Policy GLE13 is expected to have a significant positive effect in relation to IIA objective 1: Best use of land and resources.

6.241 The safeguarding of aggregates supplies within London should help to provide additional local jobs in the period while the extraction takes place, contributing towards economic growth. Therefore, Policy GLE13 is expected to have a minor positive effect in relation to IIA objective 3: Economic potential.

6.242 The policy deters hydraulic fracturing by refusing development proposals for exploration, appraisal or production of shale gas via fracking. Hydraulic fracturing can have adverse effects on people's health through the release of pollutants and noise generation so preventing its development will help protect people's health. Therefore, Policy GLE13 is expected to have a minor positive effect in relation to IIA objective 5: Health and community safety.

6.243 Policy GLE13 is also expected to have a minor positive effect in relation to IIA objective 7: Climate change, as it will assist in the provision of affordable construction materials delivered locally and in a carbon efficient manner.

6.244 The extraction of aggregates is a land-intensive industry and may therefore have impacts on local ecosystems in the short-term. However, redevelopment of exhausted aggregates sites is increasingly common in the longer term so there may be opportunities to realise enhancements in the future. Further to this, Policy GLE13 prevents fracking, which can have adverse effects on biodiversity and geodiversity through habitat loss and fragmentation, soil disturbance and landform alteration, disturbance to wildlife and water pollution risks which might affect aquatic ecosystems. Therefore, Policy GLE13 is expected to have a minor positive effect in relation to IIA objective 8: Biodiversity and geodiversity. The effect is uncertain, as it is unknown at this stage whether the extraction of aggregates will impact local ecosystems or not.

6.245 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.246 None identified.

Creating a greener, healthier, and resilient city

6.247 The section presents the appraisals of the following draft London Plan policies:

- Policy GHR1 Energy efficiency
- Policy GHR2 Low cost low carbon heat
- Policy GHR3 Whole life carbon
- Policy GHR4 Heat risk
- Policy GHR5 Flood risk and drainage
- Policy GHR6 Trees, biodiversity and geodiversity
- Policy GHR7 Green infrastructure and Urban Greening Factor
- Policy GHR8 Publicly accessible green space
- Policy GHR9 Clean and healthy waterways
- Policy GHR10 Air quality
- Policy GHR11 Cycle and car parking

6.248 The likely effects of the policies in relation to each IIA objective are shown in **Table 6.5** and described below the table.

Table 6.5: Likely effects of the 'Creating a greener, healthier, and resilient city' policies

IIA objective	Policy GHR1	Policy GHR2	Policy GHR3	Policy GHR4	Policy GHR5	Policy GHR6	Policy GHR7	Policy GHR8	Policy GHR9	Policy GHR10	Policy GHR11
IIA1: Best use of land and resources	+	++	++	0	+	+	0	+	++	0	+
IIA2: Housing	?	0	0	?	0	0	0	0	0	0	?
IIA3: Economic potential	+/-	+	0	0	+	0	0	0	0	0	0
IIA4: Successful placemaking	0	0	0	0	0	+	+	+	+	0	+
IIA5: Health and community safety	0	0	0	+	+	+	+	++	+	++	+
IIA6: Equality of opportunity	+	+	0	+	+	+	0	++	+	+	+
IIA7: Climate change	++	++	++	++	++	+	+	++	+	?	++
IIA8: Biodiversity and geodiversity	0	0	0	+	+	++	+	++	++/-	+	0
IIA9: Historic environment	0	0	0	0	0	0	0	0	+	0	0

Policy GHR1 Energy efficiency

6.249 Policy GHR1 aims to ensure high levels of energy efficiency, minimise energy consumption and occupier bills, and reduce greenhouse gas emissions so as to help achieve a net zero-carbon London. Setting strong standards for energy efficiency will minimise the use of energy in operation and therefore Policy GHR1 is expected to have a minor positive effect in relation to IIA objective 1: Best use of land and resources.

6.250 Setting requirements for standards beyond the Building Regulations will have an impact on build costs and therefore potentially the viability and delivery of housing. However, London has had higher requirements in place for many years and the supporting net zero evidence suggests the proposed policy will not have considerable build cost impacts beyond current typical practices in London. As such, the policy is expected to have an uncertain effect in relation to IIA objective 2: Housing.

6.251 Higher energy efficiency standards also have the potential to impact build costs for non-residential development. However, designing and building developments to these requirements also help to drive growth and innovation in green technologies and generate jobs, as well as resulting in buildings that have lower operational energy costs for occupiers. Therefore, Policy GHR1 is expected to have mixed minor positive and minor negative effects in relation to IIA objective 3: Economic potential.

6.252 The energy use intensity and space heating requirements set out in Policy GHR1 should result in homes that have a low heat demand and overall energy use – meaning they will be comfortable and low-cost to run for occupiers. This effect may be particularly notable for those more vulnerable to the impact of cold homes such as disabled and elderly people as well as those experiencing fuel poverty (the groups most likely to be fuel poor are families with children, disabled Londoners and people from BAME groups). Therefore, Policy GHR1 is expected to have a minor positive effect in relation to IIA objective 6: Equality of opportunities.

6.253 Policy GHR1 aims to reduce energy use associated with development, which will help support considerable reductions in carbon emissions. The policy also promotes the incorporation of renewable energy technologies which can further reduce carbon emissions, as well as the reporting of in-use energy which can help to narrow the performance gap to ensure that buildings and energy systems perform as efficiently as designed. In some scenarios there may be competition for space on the roofs of buildings from both green roofs and renewable technologies such as heat pumps and solar PV. This may reduce the amount of roof space that is available for

renewable energy generation. Overall, the policy is expected to have a significant positive effect in relation to IIA objective 7: Climate change.

6.254 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.255 The GLA identified the following reasonable alternative options to Policy GHR1 Energy efficiency:

- Option 1: Set specific on-site renewable energy targets (either as a kWh/m² target, or as an 'energy balance' target where onsite energy generation matches or exceeds energy use of the building) plus offset payments where energy balance is not achieved on site.

6.256 The overall effects of Option 1 are likely to be the same as the effects identified for Policy GHR1 with more pronounced positive effects in relation to IIA objective 7: Climate change. However, applying standard renewable energy or energy balance targets across all types of development would likely mean a high proportion of schemes would rely on offset payments to comply with the policy. This could have a negative impact on development viability and therefore on housing delivery in relation to IIA objective 2: Housing. Policy GHR1 was selected because it focuses on achieving key outcomes for energy efficiency while balancing cost and process impacts for applicants.

Policy GHR2 Low cost low carbon heat

6.257 Policy GHR2 seeks to ensure that all major developments are supplied with the lowest cost, lowest carbon heating primarily by the completion of a Low Carbon Heat Appraisal and the cooperation between developers and plan-making authorities over the management of waste heat planning. The policy promotes effective and efficient use of resources by integrating heat network infrastructure into major developments, and reduces future negative effects associated with fossil fuel energy production – for example, through the use of gas central heating. Therefore, Policy GHR2 is expected to have a significant positive effect in relation to IIA objective 1: Best use of land and resources.

6.258 Policy GHR2 aims to, in the long term, reduce the costs of heating to developments. This would also increase economic resilience by providing a source of heat which is less exposed to weather extremes and global economic shocks than that provided by fossil fuels. Therefore, Policy GHR2 is expected to have a minor positive effect in relation to IIA objective 3: Economic potential.

6.259 The objective of this policy to support low cost, low carbon heating will also have an effect on residential development connected to heat networks, which should help reduce heating costs. The effect may be particularly notable for those more vulnerable to the impact of cold homes such as disabled and elderly people as well as those experiencing fuel poverty (the groups most likely to be fuel poor are families with children, disabled Londoners and people from BAME groups). Therefore, Policy GHR2 is expected to have a minor positive effect in relation to IIA objective 6: Equality of opportunity.

6.260 The implementation of heat networks and the reuse of waste energy will reduce energy demand in large schemes and increase resilience to climate change and climate related shocks globally. Heat networks are also part of the circular economy and reducing energy and promoting low carbon operations, including use of waste heat, will reduce carbon emissions. Therefore, Policy GHR2 is expected to have a significant positive effect in relation to IIA objective 7: Climate change.

6.261 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.262 None identified.

Policy GHR3 Whole life carbon

6.263 Policy GHR3 sets out requirements for the consideration of existing buildings and structures as part of development to minimise embodied carbon emissions. It sets expectations for lean design approaches and upfront embodied carbon emission targets; this promotes the re-use of previously developed land and buildings and minimises the use of resources in construction and operation. The policy also supports the waste hierarchy and circular economy principles through the reuse of materials which can help reduce construction waste. In some cases, the re-use of existing buildings could negatively impact site capacity if the layout or structure of the existing buildings limits the amount of development that can be incorporated compared to a cleared site. Overall, Policy GHR3 is expected to have a significant positive effect in relation to IIA objective 1: Best use of land and resources.

6.264 The key aim of Policy GHR3 is to reduce carbon emissions associated with the built environment. It promotes the use of low-carbon construction materials and processes and supports the growth of low carbon and circular economy sectors, including positive impacts on demand for low carbon and recycled products and materials. A whole life-cycle carbon approach also promotes efficient approaches to

operational energy once a building is constructed and in use and so supports energy efficiency. Therefore, the policy is likely to have a significant positive effect in relation to IIA objective 7: Climate change.

6.265 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.266 None identified.

Policy GHR4 Heat risk

6.267 Policy GHR4 sets out criteria for preventing and mitigating adverse impacts on the Urban Heat Island. Some of these criteria could impact on development viability, such as the requirement for cross ventilation in residential units and potentially limit housing delivery. Therefore, an uncertain effect is expected in relation to IIA objective 2: Housing.

6.268 Policy GHR4 sets out how development should prevent and mitigate adverse impacts on the Urban Heat Island and reduce overheating impacts on occupants. The policy prioritises a number of passive design measures to ensure buildings are comfortable for users to occupy, including well-designed shading and adequate ventilation to reduce the risks of overheating. This will have positive effects on the health and well-being of building occupiers. Further to this, the provision of green and blue infrastructure could help form new active travel routes, with beneficial effects on people's health. Therefore, Policy GHR4 is expected to have a minor positive effect in relation to IIA objective 5: Health and community safety.

6.269 The passive design measures that are prioritised through the approach set out in the policy should also help reduce the need for active cooling and therefore reduce the potential energy costs. This will benefit those who may otherwise struggle to pay energy bills and therefore a minor positive effect is expected in relation to IIA objective 6: Equality of opportunity.

6.270 The policy requires development, through masterplanning and design, to mitigate the impacts of, and reduce contributions to, the Urban Heat Island. This is likely to influence the design of green infrastructure and water spaces as part of development and may include measures such as large-canopied trees to provide shade, green spaces that reduce the absorption of solar thermal energy and green and water spaces that cool the air through evapotranspiration. The policy aims to reduce the risks of overheating for occupants of buildings by considering future warmer climate conditions and prioritising passive design measures – helping to

improve the resilience of the built environment and reducing the risks associated with high temperatures. Therefore, Policy GHR4 is likely to have a significant positive effect against IIA objective 7: Climate change.

6.271 Policy GHR4 encourages the provision of green and blue infrastructure to mitigate heat risk, and measures such as new tree planting and water spaces are also likely to function as new or improved habitats. Therefore, Policy GHR4 is expected to have a minor positive effect in relation to IIA objective 8: Biodiversity and geodiversity.

6.272 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.273 None identified.

Policy GHR5 Flood risk and drainage

6.274 Policy GHR5 seeks to reduce London's surface water flood risk, including through the provision of SuDS. These slow, store, filter, and treat runoff in multiple ways and can therefore help protect and often improve water quality. Therefore, Policy GHR5N is expected to have a minor positive effect in relation to IIA objective 1: Best use of land and resources.

6.275 Reducing London's surface water flood risk should help reduce physical damage to residential and commercial properties while reducing business disruption and allowing businesses to continue trading during periods of flooding, thus protecting local economic output and revenue streams. Therefore, Policy GHR5 is expected to have a minor positive effect in relation to IIA objective 3: Economic potential.

6.276 The implementation of Policy GHR5 would encourage a catchment-wide approach to planning whereby space is set aside for water storage during high rainfall events. These spaces could take the form of valuable green open spaces, which would offer local residents access to good quality open space to exercise in and provide mental and physical respite from the city. The policy is also likely to help mitigate flood risk and people's anxiety around this, with positive effects on their mental wellbeing. Therefore, Policy GHR5 is expected to have a minor positive effect in relation to IIA objective 5: Health and community safety.

6.277 London's climate risk mapping [\[See reference 17\]](#) shows that high flood risk areas often coincide with places that have higher levels of income deprivation, poor

health outcomes, larger proportions of very young and older residents, and higher proportions of BAME populations. Through ensuring that new developments do not increase the risk of flooding for existing communities, the policy will help to secure greater equality of opportunity by reducing environmental and socioeconomic disadvantages associated with flood risk. Therefore, Policy GHR5 is expected to have a minor positive effect in relation to IIA objective 6: Equality of opportunity.

6.278 The purpose of the policy is to mitigate flood risk, which is increasing as a result of climate change. The policy sets out different ways in which it will achieve this, including identifying key flow paths and priority areas for surface water management, the incorporation of SuDS and on-site greenfield run-off rates, amongst others. Therefore, Policy GHR5 is expected to have a significant positive effect in relation to IIA objective 7: Climate change.

6.279 The policy will encourage opportunities for integrating the multi-functionality of SuDS into development design, which is likely to lead to benefits to water quality and biodiversity through integration into the wider blue and green infrastructure network, and natural management of floodwater. The policy directly promotes the use of SuDS and a catchment management approach. Further to this, implementation of the policy would encourage a catchment-wide approach to planning whereby space is set aside for water storage during high rainfall events. These spaces could take the form of valuable green/open space, which would enhance the local landscape and encourage biodiversity. Therefore, Policy GHR5 is expected to have a minor positive effect in relation to IIA objective 8: Biodiversity and geodiversity.

6.280 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.281 The GLA identified the following reasonable alternative options to Policy GHR5 Flood risk and drainage:

- Option 1: Apply greenfield run-off rates ambition to all types of development, rather than only referable developments.
- Option 2: Require the achievement of greenfield run-off rates in specified developments

6.282 The overall effects of Option 1 are likely to be the same as the effects identified for Policy GHR5. However, applying the ambition to all types of development could make overall application requirements onerous for smaller developments.

6.283 The overall effects of Option 2 are likely to be the same as the effects identified for Policy GHR5. However, requiring greenfield run-off rates could impact development viability and prevent housing delivery. Therefore, Option 2 is expected to have an uncertain effect against IIA objective 2: Housing. Policy GHR5 was selected because it focuses on developments where it can have most impact to smooth application assessment and given referable criteria with a lower scale threshold in the green belt, help to support an overall brownfield first approach. Absolute requirements would be overly inflexible given viability and feasibility considerations.

Policy GHR6 Trees, biodiversity and geodiversity

6.284 Policy GHR6 aims to protect designated sites for nature and existing trees of value, and to promote the provision of new and enhanced habitats including London's urban forest as part of development. The policy is also likely to steer development away from sites with nature value and towards previously developed land. Therefore, Policy GHR6 is expected to have a minor positive effect in relation to IIA objective 1: Best use of land and resources.

6.285 The policy sets out how biodiversity and geodiversity assets and existing trees of value should be protected. It also promotes new and enhanced habitats and the incorporation of new tree planting which can help improve neighbourhood distinctiveness and attractiveness. Therefore, Policy GHR6 is expected to have a minor positive effect in relation to IIA objective 4: Successful placemaking.

6.286 The policy promotes design that incorporates and provides better connectivity and access to natural greenspace and trees. Improving Londoners' connections to nature is likely to have beneficial effects on mental wellbeing. Protecting and enhancing London's tree canopy coverage is also likely to help reduce air pollution (particulates and nitrogen dioxide), while also providing shade which can help mitigate urban heat island effects. As such, Policy GHR6 is expected to have a minor positive effect against IIA objective 5: Health and community safety.

6.287 Improving access to nature is likely to help ameliorate existing inequalities in access to natural spaces – particularly for those in flats who may not have access to a garden. Therefore, Policy GHR6 is expected to have a minor positive effect in relation to IIA objective 6: Equality of opportunity.

6.288 Policy GHR6 seeks to support the natural environment, including protecting and enhancing existing green infrastructure and introducing new natural spaces, in addition to the incorporation of new trees as part of development proposals. Green infrastructure can have a notable impact on heat risk by providing shading for people,

streets and buildings, reducing the amount of solar energy that is absorbed by the built environment and also providing cooling effects through evapotranspiration. Trees and other green infrastructure can also help to store carbon through carbon sequestration. Therefore, Policy GHR6 is expected to have a minor positive effect in relation to IIA objective 7: Climate change.

6.289 The policy establishes a framework for assessing and designating sites important for biodiversity as well as for understanding the functions and value of existing trees. The policy includes a hierarchy designed to avoid potential harm from development and also sets out mitigation measures where necessary. Policy GHR6 also includes requirements for boroughs to identify and protect sites of geodiversity value. Therefore, Policy GHR6 is expected to have a significant positive effect in relation to IIA objective 8: Biodiversity and geodiversity.

6.290 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.291 None identified.

Policy GHR7 Green infrastructure and Urban Greening Factor

6.292 Policy GHR7 encourages the coordination of green infrastructure interventions to strengthen connections between green assets and to incorporate green infrastructure as part of new development. This is likely to contribute to and support design quality and sense of place, particularly in respect of landscapes and maintaining and enhancing an attractive public realm. Therefore, Policy GHR7 is likely to have a minor positive effect in relation to IIA objective 4: Successful placemaking.

6.293 Policy GHR7 references the London Green Infrastructure Framework (LGIF) and London Local Nature Recovery Strategy (LNRS) as key evidence to support the protection and enhancement of green infrastructure in London. The LGIF in particular identifies multiple functions of green infrastructure which boroughs can use to maximise positive outcomes of greening interventions to address various social and environmental issues. This includes reducing air pollution and overheating risk, as well as benefits to mental wellbeing and physical health through access to natural greenspaces. Policy GHR7 promotes design that incorporates green infrastructure as part of development. This is likely to increase the provision of on-site greening measures, providing better connectivity and access to natural greenspace for those who live in or visit those developments. At larger scales this could also support active

travel and help to improve access to open spaces. As such, Policy GHR7 is expected to have a minor positive effect in relation to IIA objective 5: Health and community safety.

6.294 The Urban Greening Factor (UGF) part of Policy GHR7 encourages the integration of multifunctional greening as part of development informed by the green infrastructure priorities in that location. In locations that have particular environmental challenges (for example flooding or overheating), the greening measures should be designed to prioritise functions that address those issues. This is likely to lead to new natural spaces and green features as part of development which provide green sustainable drainage to slow down or retain surface water to reduce flood risk, or which provide cool or shaded water spaces or planting to reduce the impacts of the urban heat island effect which is likely to have positive impacts on climate resilience. Further to this, the focus on green infrastructure in the policy has the potential to help mitigate climate change through carbon sequestration and adaptation by enhancing flood resilience and water retention and providing cooling. However, it is noted that the use of green roofs (which are a common way for London building typologies to meet urban greening factor targets) may have some impact on the potential roof space on buildings that is available for solar photovoltaic panels, which could help mitigate climate change. Overall, Policy GHR7 is expected to have a minor positive effect in relation to IIA objective 7: Climate change.

6.295 The UGF will have a direct influence on the overall amount and quality of green infrastructure provided as part of development. The functionality and design of that greening will depend on the priorities for a particular site. Where biodiversity is identified as a priority (e.g. because of evidence in the LGIF or LNRS), or where other requirements (such as meeting mandatory Biodiversity Net Gain (BNG)) exist, new or enhanced habitats for biodiversity are likely to be delivered as part of meeting the urban greening requirements of this policy. Further to this, the policy requires development proposals to respond positively to existing green infrastructure assets and through the key diagram, identifies strategic green infrastructure opportunities. Therefore, Policy GHR7 is expected to have a minor positive effect in relation to IIA objective 8: Biodiversity and geodiversity.

6.296 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.297 None identified.

Policy GHR8 Accessible green space

6.298 Policy GHR8 requires boroughs to use appropriate evidence to incorporate specific expectations and objectives in relation to Accessible Green Spaces (AGSs) within Local Plans. This push for a strategic and plan-led approach to the management of green space is likely to promote the effective use of land in new developments as well as protecting environmental resources such as soils, water and green infrastructure. Therefore, Policy GHR8 is expected to have a minor positive effect in relation to IIA objective 1: Best use of land and resources.

6.299 The policy creates an expectation for boroughs to set local standards on the expected contribution of new development, especially housing, to the provision of new AGSs in a uniform manner. It includes expectations that provision in line with locally set standards is embedded within site allocations as a key aspect of infrastructure provision. This will help to ensure that new development which creates an additional burden on existing green spaces provides suitable contributions towards new green space to avoid exacerbating issues of undersupply and overuse, and that this is well integrated into design proposals and masterplanning objectives. In doing so, it will help to create more sustainable and attractive places. Therefore, it is likely to have a minor positive effect in relation to IIA objective 4: Successful placemaking.

6.300 A key objective of this policy is to improve access to nature and green space for Londoners, and the policy promotes planning and design that incorporates better connectivity to AGSs, including at the highly local (pocket) level. Green space plays a vital role in supporting physical and mental health, reducing health inequalities, mitigating flood and heat risk, and improving quality of life. Good quality access to such spaces provides multifaceted direct benefits to the amenity, health and well-being of London's residents, workers and visitors alike. This policy seeks to increase access, prevent net loss of designated AGS and ensure that green spaces are well designed, multifunctional and supported by long-term management. This also supports active travel and helps to improve access to spaces for tranquillity and recreation. As such, the policy is expected to have a significant positive effect in relation to IIA objective 5: Health and community safety.

6.301 Although London is a green city with approximately 50% of London's area being 'green' (including tree cover, gardens, verges, and green roofs), the amount of publicly accessible green space varies considerably across the city, with some areas lacking in access. As density increases, green spaces become ever more important – especially in areas where there is already a shortage. Another mechanism introduced by this policy that enhances the requirements of the NPPF is the need for boroughs to identify and take account of Areas of Deficiency (AoDs) for green space in plan

and decision-making. This intervention is aimed specifically at tackling existing inequalities in the provision of existing green infrastructure, and the associated health and social risks that this creates. Through the policy's higher prioritisation for onsite delivery of AGS within Walkable AoDs for example, it attempts to improve distribution of green space in a more equitable manner and address existing deficits. In addition, expectations within the policy for new AGS to be designed and secured with long term maintenance and management plans that address the Public London Charter are intended to ensure that such spaces are safe, inclusive and accessible, and are designed in particular to meet the needs of those with protected characteristics, such as women and children, older people and people with disabilities. Overall, the policy is likely to have a significant positive effect in relation to IIA objective 6: Equality of opportunity.

6.302 The delivery of new and improved green space within the urban environment provides multifaceted benefits to the environment, including for climate resilience. Where designed to be multifunctional, such spaces can respond to local climate pressures and provide additional infrastructure for managing stormwater flows etc. The policy aims to increase the overall quantum of such spaces across the capital, in particular in areas of AoD where there are already shortages of accessible green spaces. The policy also includes expectations for new, or improved AGSs to be designed and managed in line with local green infrastructure (GI) objectives and/or those set out within the London Green Infrastructure Framework (LGIF). This will help ensure that all AGSs are multifunctional and respond to locally specific GI challenges. For instance, where the LGIF or local evidence such as flood risk assessments identify areas of critical drainage, SuDS features should be introduced as part of designs within new AGSs to help mitigate this risk. Overall, the policy is expected to have a significant positive effect in relation to IIA objective 7: Climate change.

6.303 The policy's strong protections for AGSs will play an important role in the protection of sites of value for nature conservation, including green and blue spaces which are not formally designated on the basis of their nature conservation value but nonetheless provide critical habitats, foraging spaces or green links for wildlife. Such protections will also help preserve the integrity of soils and geodiversity on sites which may have been left undisturbed for lengthy periods. Expectations for plan-making authorities to prepare strategies to improve existing green spaces provides opportunities to deliver objectives set out within the Local Nature Recovery Strategy. New or enhanced habitats for biodiversity are also likely to be delivered within new development as part of meeting the requirements of this policy from new development. Therefore, the policy is expected to have a significant positive effect in relation to IIA objective 8: Biodiversity and geodiversity.

6.304 The policy is not likely to have an effect of any of the other IIA objectives.

Reasonable alternatives

6.305 The GLA identified the following reasonable alternative options to different elements of Policy GHR8 Accessible Green Space (quantity targets, quality standards and onsite delivery requirements):

- Option 1: to incorporate benchmark, strategic-scale quantity targets for AGS provision within the London Plan to cover boroughs with no locally set standards.
- Option 2: to introduce uniform, strategic benchmark standards for quality of AGS for London.
- Option 3: to not specify a sequential approach which prioritises onsite delivery of AGS.

6.306 Option 1 would provide interim certainty on expected AGS provision ahead of locally set standards, proposing separate benchmarks for inner and outer London to reflect differing contexts. This includes setting benchmarks for outer London boroughs aligned with Natural England's Green Infrastructure Framework (GIF) of 3 hectares per 1,000 new residents, with a lower standard for inner London. While this would ensure consistency and potentially increased AGS delivery in some locations and streamlined negotiations, feasibility testing within the technical evidence for the London Plan showed considerable variation in existing provision across boroughs. To remain feasible, any such strategic-scale target would need to be set at the lowest achievable rate within inner or outer London boroughs. This would mean setting standards at a lower level than some boroughs could potentially achieve. It would also have additional viability implications which, at the strategic level, would be difficult to accurately predict and model. Therefore, Option 1 is expected to have minor rather than significant positive effects in relation to IIA objectives 5: Health and community safety, 6: Equality of opportunity, 7: Climate change and 8: Biodiversity and geodiversity, with the minor positive effects against IIA objectives 1: Best use of land and resources and 4: Successful placemaking and downgraded to negligible effects. The lack of certainty around viability implications may, in addition, result in minor negative effects against objectives 2: Housing and 3: Economic potential on account of a potential worsening of deliverability.

6.307 Option 2 would involve applying London-wide AGS quality standards based on Natural England's GIF, benchmarked against Green Flag Award criteria, rather than borough-specific standards. Although this would promote consistency and potentially improve AGS quality, the technical evidence showed that Green Flag criteria are less

applicable to smaller AGS typologies, for which compliance would be difficult. Strategic use of such benchmarks could therefore bias delivery towards larger open spaces, discouraging smaller or more natural AGS on the basis that they could not meet expected quality standards. This may suppress the delivery of smaller AGS provision, which is an objective of Policy GHR8, especially within walkable Areas of Deficiency. As such, this option is expected to have minor positive effects in relation to IIA objectives 5: Health and community safety, 6: Equality of opportunity, 7: Climate change and 8: Biodiversity and geodiversity. This downgrading in effects is largely based on a reduction in overall, and especially smaller and more local, AGS. The effects of this option on all other objectives would remain as expected for Policy GHR8.

6.308 Option 3 would involve a more flexible approach, retaining quantity standards while allowing decisionmakers' discretion over how and where AGS is delivered. However, by not including a sequential approach which prioritises onsite delivery of AGS, especially within walkable AoDs as per Policy GHR8, this would likely increase off-site contributions and improvements to existing spaces rather than the creation of new AGS. While beneficial for the quality of existing provision and enabling higher development capacity through increased plot coverage, this approach would place less emphasis on expanding London's green infrastructure and integrating the landscape into placemaking. This option would therefore be expected to have minor positive effects in relation to IIA objectives 2: Housing and 3: Economic potential on the basis of a potential greater quantum of delivery. Effects on IIA objectives 1: Best use of land and resources and 4: Successful placemaking would remain as minor positive, though such effects would be somewhat diminished as a result of the greater stress placed upon existing green infrastructure and decrease in the delivery of new green spaces. However, expected effects against IIA objectives 5: Health and community safety, 6: Equality of opportunity, 7: Climate change and 8: Biodiversity geodiversity would all be downgraded to minor positive effects on the basis on this reduction in new AGS provision. Policy GHR8 was selected because it is the most practical and clear manner to integrate national requirements and standards as well as the Mayor's objectives around addressing deficiency in access to green space into London planning requirements.

Policy GHR9 Clean and healthy waterways

6.309 Policy GHR9 seeks to protect and enhance London's waterways, including by requiring development proposals to apply the Simple Index Approach to inform SuDS design and maximise action against misconnections and cross connections. It also requires Local Plans to integrate strategic locations identified within the Mayor's Clean and Healthy Waterways into site allocations, which seek to make

improvements to water quality and accessibility. The policy also requires development proposals to be sufficiently set back from London's waterways to support flood risk management and the creation of natural corridors, and for Local Plans to reflect the 10 Riverside Strategy principles – several of which relate to flood protection. Therefore, overall, Policy GHR9 is expected to have a significant positive effect in relation to IIA objective 1: Best use of land and resources.

6.310 Policy GHR9 requires relevant development proposals to conserve and enhance the distinct open character of waterways. Further to this, the policy seeks to protect the openness of the waterways by ensuring they are not used as an extension of developable land or line of continuous moored crafts. This will help to ensure that new development in the vicinity of waterways is high quality and appropriately integrated with and supports the distinctive character of waterways and surrounding neighbourhoods. Therefore, Policy GHR9 is expected to have a minor positive effect in relation to IIA objective 4: Successful placemaking.

6.311 Policy GHR9 seeks to provide safe and inclusive access to London's waterways and supports the provision of appropriate recreational activities. This can support active travel, which can have a positive effect on health. Therefore, Policy GHR9 is expected to have a minor positive effect in relation to IIA objective 5: Health and community safety.

6.312 The proposed policy promotes greater equality and opportunity by supporting greater participation in public life through the protection of, and where necessary, provision of new inclusive access to London's waterways. As such, the policy is expected to have a minor positive effect in relation to IIA objective 6: Equality of opportunity.

6.313 Policy GHR9 requires Local Plans to reflect the 10 Riverside Strategy principles, of which a number refer to upgrading of and/or safeguarding of land for the provision of flood defences. The policy also requires sufficient setback of relevant developments to allow for the maintenance of flood defences. The policy also supports the strengthening of the natural environment, including through supporting the creation of nature corridors along waterways and improvements in biodiversity linked to improvements in water quality. Therefore, the policy is expected to have a minor positive effect in relation to IIA objective 7: Climate change.

6.314 The policy seeks the implementation of measures that would support improvements to water quality and biodiversity, such as the setting back of relevant development proposals. However, improved access (combined with an anticipated increase in pollution) could result in increased recreational pressure being placed on the waterways, which in turn could have a negative impact on biodiversity and water quality should such an activity not be managed appropriately. As such, the policy is

expected to have mixed significant positive and minor negative effects in relation to IIA objective 8: Biodiversity and geodiversity.

6.315 The policy seeks to conserve and enhance the distinct open character of London's waterways, many of which hold historic significance. Further, through flood risk management the policy also seeks to protect waterfront areas at risk from the effects of climate change related events. Therefore, Policy GHR9 is expected to have a minor positive effect in relation to IIA objective 9: Historic environment.

6.316 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.317 None identified.

Policy GHR10 Air quality

6.318 Policy GHR10 continues to support an improvement in air quality, in line with the ambitions first established in the Mayor's Environment Strategy. The policy sets out a London-wide approach to minimising negative air quality impacts of individual developments of concern and seeking other improvements such as reduction of exposure. It also seeks to address construction emissions, through reducing emissions associated with Non-Road Mobile Machinery (NRMM) in line with current practice. Whilst there have been improvements to air quality, London still faces challenges in improving its air quality, with parts of the city still exceeding UK legal limits for NO₂, and most of the city still exceeding WHO air quality guidelines. The impacts of poor air quality on health are well documented and as such, improvements to air quality associated with new development should help protect people's health. Therefore, Policy GHR10 is expected to have a significant positive effect in relation to IIA objective 5: Health and community safety.

6.319 The overarching aim of Policy GHR10 is to improve air quality. The improvement in air quality will have a positive effect on all Londoners, including children, women who are pregnant, older people and those with existing health conditions who are particularly vulnerable to the effects of air pollution, and Black, Asian and minority ethnic communities who are more likely to live in areas with poorer air quality. In addition, the policy requires the latest available evidence, including on vulnerability and exposure, to inform site allocations and identify priority interventions that are to be delivered and/or secured. Therefore, Policy GHR10 is expected to have a minor positive effect in relation to IIA objective 6: Equality of opportunity.

6.320 The causes of poor air quality can also contribute towards carbon emissions. Policy GHR10 seeks to ensure that new developments that come forward do not worsen, and help to reduce its impacts on, London's air quality. This can be through the way that the development has been designed and/or through the mitigation measures that they seek to implement. It is possible that the implementation of such measures to improve air quality can also help in reducing carbon emissions, although this will vary between developments. Overall, Policy GHR10 is expected to have an uncertain effect in relation to IIA objective 7: Climate change.

6.321 Air quality is one external factor which can impact on the quality of habitats and biodiversity within London. The policy requires plan-making authorities to use the latest available evidence regarding air quality, vulnerability and exposure to identify prioritised interventions and inform site allocations/area-based approaches to plan for air quality improvements. This evidence will include Habitats Regulations Assessments and means that the policy may lead to identification of additional areas of concern where particular policy requirements related to areas of concern would apply in relation to habitats vulnerabilities linked to air pollutant deposition. Therefore, Policy GHR10 is expected to have a minor positive effect in relation to IIA objective 8: Biodiversity and geodiversity.

6.322 This policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.323 None identified.

Policy GHR11 Cycle and car parking

6.324 Policy GHR11 Cycle and car parking requires development to provide cycle parking and limit car parking. This will reduce the land needed for car parking, and, by increasing the use of sustainable modes of transport, will reduce land needed for roads. Therefore, the policy is expected to have a minor positive effect in relation to IIA objective 1: Best use of land and resources.

6.325 The policy limits the number of car parking spaces provided as part of development, which can make it harder to sell homes. This could discourage the number of housing developments coming forward in London and so an uncertain effect is expected in relation to IIA objective 2: Housing.

6.326 The policy requires development to provide cycle parking and hire cycle infrastructure and limit car parking. Cycle infrastructure will support development of places that reduce the need to travel by car. Limiting car parking will do the same, as

well as increasing the amount of space available for a high-quality public realm. Therefore, the policy is expected to have a minor positive effect in relation to IIA objective 4: Successful placemaking.

6.327 The policy requires development to provide cycle parking and limit car parking. This will increase the use of sustainable modes of transport and limit the growth of car use, which has road safety, air quality, and exercise benefits. It also requires cycle parking to be secure in accordance with the 'London Cycle Design Standards'. This will increase safety of property and users. Therefore, the policy is expected to have a minor positive effect in relation to IIA objective 5: Health and community safety.

6.328 The policy requires provision of parking for larger cycles and disabled persons' car parking. The provision will meet the travel needs of people that may need a larger cycle (potentially affecting children and disabled people) and that need disabled persons' car parking. Therefore, the policy is expected to have a minor positive effect in relation to IIA objective 6: Equality of opportunity.

6.329 The policy requires development to provide cycle parking and hire cycle infrastructure and limit car parking. This will increase the use of sustainable modes of transport and limit the growth of car use, which will reduce greenhouse gas emissions. Therefore, the policy is expected to have a significant positive effect in relation to IIA objective 7: Climate change.

6.330 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.331 None identified.

Place visions and place-based approaches

6.332 The section presents the appraisals of the following draft London Plan policies:

- Policy PV1 Brownfield First Opportunity Areas (BFOAs)
- Policy PV2 Central Activities Zone (CAZ)
- Policy PV3 Town centres and high streets
- Policy PV4 Strategic economic clusters and corridors
- Policy PV5 Suitable uses on industrial land

- Policy PV6 Metropolitan Open Land (MOL)
- Policy PV7 Sustainable development and enhancement of the green belt
- Policy PV8 Strategic and local views including the London View Management Framework

6.333 The likely effects of the policies in relation to each IIA objective are shown in **Table 6.6** and described below the table.

Table 6.6: Likely effects of the 'Place visions and place-based approaches' policies

IIA objective	Policy PV1	Policy PV2	Policy PV3	Policy PV4	Policy PV5	Policy PV6	Policy PV7	Policy PV8
IIA1: Best use of land and resources	++	++	++	+/-	+	+	++/--	0
IIA2: Housing	+	+	++	+	+	-	++/-	0
IIA3: Economic potential	++	+	++	++	++	0	++/-	+
IIA4: Successful placemaking	++	++	++	+	0	+	++/-?	++
IIA5: Health and community safety	+	+/-	+/-	+	0	++	+/-	0
IIA6: Equality of opportunity	+	++?	++	+	0	+	+	0
IIA7: Climate change	+	+/-	+	+/-	0	++	+/-	0
IIA8: Biodiversity and geodiversity	+	+/-	+	0	0	++	+/-	0
IIA9: Historic environment	+	++/-	0	0	0	+	0	++

Policy PV1 Brownfield First Opportunity Areas (BFOAs)

6.334 Policy PV1 seeks to optimise the development of brownfield land that is, or is planned to be, well served by public transport. By supporting and sustaining industrial capacity the policy will protect waste management sites, which are located in industrial areas, and support the requirement for net self-sufficiency. Brownfield land may be contaminated so bringing forward sites for development will also promote remediation of contaminated land. Therefore, the policy is expected to have a significant positive effect in relation to IIA objective 1: Best use of land and resources.

6.335 The policy encourages actions to overcome barriers to the delivery of development on brownfield sites with considerable capacity for new homes. Housing on these sites will contribute to meeting London's housing needs, including the provision of affordable housing. Further to this, residents will benefit from improved access to public transport, new amenities and services, and access to better quality housing. Therefore, the policy is expected to have a minor positive effect in relation to IIA objective 2: Housing.

6.336 The policy seeks to provide capacity for new jobs as well as homes, and to support and sustain capacity for industrial uses. Development will promote a range of types of jobs in Opportunity Areas that are spatially distributed across London, meeting the need for a diversity of economic activity and to support growth sectors' spatial needs. The policy prioritises active travel and access to public transport which will address connectivity barriers to growth. The encouragement of meanwhile uses can sustain London's culture and heritage and improve resilience to economic change through flexibility. Therefore, the policy is expected to have a minor positive effect in relation to IIA objective 3: Economic potential.

6.337 The policy states that proposals relating to Brownfield First Opportunity Areas should prioritise active travel modes and public transport accessibility that will reduce the need to travel by car. The principle of optimising development in Opportunity Areas will encourage higher densities that support a range of infrastructure and services. The policy also promotes integration with surrounding neighbourhoods which can support existing neighbourhood distinctiveness and local identity. Therefore, the policy is expected to have a significant positive effect in relation to IIA objective 4: Successful placemaking.

6.338 The policy prioritises active travel and public transport, which will reduce air pollution and CO₂ emissions, improve road safety and reduce the use of private cars. The policy encourages consideration of the integration of new development with surrounding neighbourhoods which can enhance connectivity between communities, including to green space and community facilities. Opportunity Areas have capacity

for considerable development and there will be disruption from noise, dust and vibration during construction and operation, although this will be managed through the planning process and will be temporary. Therefore, in the medium to long term, the policy is expected to have a minor positive effect in relation to IIA objective 5: Health and community safety.

6.339 The policy will encourage the regeneration of disused and underused brownfield land for new homes and jobs, which will reduce deprivation and improve quality of life. The policy principle to seek involvement of underrepresented groups will help protect the character of places where this is linked to the identities and needs of particular groups. Inclusive design will be encouraged through integration with surrounding neighbourhoods. Therefore, the policy is expected to have a minor positive effect in relation to IIA objective 6: Equality of opportunity.

6.340 The policy promotes active travel and access to public transport which will help to reduce transport-related greenhouse gas emissions. Some brownfield sites in Opportunity Areas will be in areas of flood risk and new development can incorporate SuDS and flood protection measures. Therefore, the policy is expected to have a minor positive effect in relation to IIA objective 7: Climate change.

6.341 The redevelopment of brownfield sites offers the opportunity to create new and enhance existing wildlife and geological sites and reduces the need to use greenfield sites where impacts on biodiversity may be more likely (although it is recognised that brownfield sites may still harbour valuable biodiversity). Therefore, the policy is expected to have a minor positive effect in relation to IIA objective 8: Biodiversity and geodiversity.

6.342 The policy recognises the role of heritage, culture and local identity in place-making. The policy also promotes integration with surrounding neighbourhoods. Directing new development to brownfield sites provides the opportunity to regenerate waterfront sites and to incorporate protection from effects of climate change related events. Therefore, the policy is expected to have a minor positive effect in relation to IIA objective 9: Historic environment.

Reasonable alternatives

6.343 None identified.

Policy PV2 Central Activities Zone (CAZ)

6.344 Policy PV2 makes best and most efficient use of land and resources by promoting the provision of CAZ strategic economic functions and housing, supporting

the densification of the CAZ, using previously developed land and capitalising on its extremely well-connected public transport infrastructure. Dense urban forms such as the CAZ can also support more effective use of resources during operation through economies of scale and other efficiencies. The policy supports both the redevelopment and refurbishment of office space in the CAZ. Therefore, Policy PV2 is expected to have a significant positive effect in relation to IIA objective 1: Best use of land and resources.

6.345 Policy PV2 supports the delivery of net additional housing whilst ensuring that the internationally significant roles of the CAZ in commerce, culture and the 24-hour economy are sustained and enhanced. It does this by distinguishing Core CAZ areas where its international strategic functions are prioritised, and Mixed CAZ areas where new housing can be delivered alongside strategic functions. Therefore, Policy PV2 is expected to have a minor positive effect in relation to IIA objective 2: Housing.

6.346 Policy PV2 promotes the internationally significant economic, cultural and other strategic functions of the CAZ and provides for the spatial needs (land, infrastructure, locational and space) for a diverse range of economic activities and sectors, including those identified in the London Growth Plan. It promotes tourism activities enhanced by its globally renowned heritage and culture. The policy also supports innovation and technological opportunity across the zone and specialist clusters of economic activity. It supports net additional employment floorspace in highly accessible locations in Core CAZ and Mixed CAZ areas which is anticipated to provide capacity for projected jobs growth over the Plan period. The policy addresses barriers to economic growth by supporting enhancements to public transport and digital connectivity infrastructure, strengthening the hyper-connectivity of the zone to support its agglomeration of strategic economic functions. Therefore, Policy PV2 is expected to have a significant positive effect in relation to IIA objective 3: Economic potential.

6.347 Policy PV2 supports well-served mixed use places by promoting new floorspace in a mix of CAZ strategic functions alongside new housing, whilst ensuring an appropriate balance between these uses in Core CAZ and Mixed CAZ areas. This approach should sustain and enhance the globally significant roles of the zone in commerce, culture and experience. The policy includes support to deliver improvements to the public realm for residents, workers and visitors, ensuring it is resilient, safe, accessible and inclusive. The policy includes clauses to sustain and enhance its distinct built and natural environment. In this context, Policy PV2 is expected to have a significant positive effect in relation to IIA objective 4: Successful placemaking.

6.348 The policy includes clauses that support positive outcomes that address the wider determinants of health, including employment, housing, social and cultural interaction, transport, community safety and environmental quality. It promotes a built environment that supports healthy behaviours including a public realm that is resilient, safe, accessible and inclusive. The density of activities and new development in the CAZ could however give rise to negative effects on health related to air quality, light and noise. The dense, mixed urban form of the CAZ and its agglomerations of internationally significant activities generate distinct community safety and security matters. The policy references the need to enhance and address the distinct safety and security requirements of the CAZ. On balance, Policy PV2 is expected to have mixed minor positive and minor negative effects in relation to IIA objective 5: Health and community safety.

6.349 The policy supports substantial growth in employment in a range of economic sectors requiring different levels of skills. Without investment in education and skills, delivery of affordable housing and accessible transport (which are outside of the remit of this policy), some of these jobs may not be accessible to all Londoners (and especially those from disadvantaged or under-represented groups including young people, women, Londoners from a minoritised background, and disabled and neurodivergent Londoners). The policy seeks to reduce disadvantage by promoting a more inclusive CAZ economy through the availability of a range of business space (including secondary space and markets) and securing the delivery of (or contributions to) affordable workspace. Policy PV2 supports the provision of cultural and social infrastructure (including healthcare, education and other services) to meet the needs of residents, workers and visitors in both Core CAZ and Mixed CAZ areas. Overall, Policy PV2 is expected to have a significant positive effect in relation to IIA objective 6: Equality of opportunity with some uncertainty, as accessibility of employment is contingent on complementary initiatives such as the Inclusive Talent Strategy and education.

6.350 The CAZ is a spatial form of development which supports lower carbon emissions through transport as a very high proportion of trips to, from and within the CAZ are made by sustainable modes. The policy includes a clause to enhance the resilience of the CAZ to climate change, flooding and heat risk arising from the urban heat island effect. The policy also sustains and enhances its distinct natural environment including the River Thames, Royal Parks and other valued waterways and green and open spaces which are important for both climate change mitigation and adaptation. The scale of demand for new development in the CAZ could however result in an increase in CO₂ emissions due to associated construction materials and/or vehicle transport. The policy supports both the redevelopment and refurbishment of office space in the CAZ. Redevelopment may result in more embodied carbon emissions compared to refurbishment. On balance, Policy PV2 is

expected to have mixed minor positive and minor negative effects in relation to IIA objective 7: Climate change.

6.351 The waterways, green and other open spaces in the CAZ support a range of biodiversity and are accessible to residents, workers and visitors to enjoy. Some important species may nest or roost on buildings or structures in the CAZ. The intensification of development and activity that is supported by some of the CAZ policy clauses can however put pressure on these valued habitats and species. To address this, the policy refers to sustaining and enhancing the distinct natural environment of the CAZ including the River Thames, Royal Parks and other valued waterways and green and open spaces. This will assist in conserving and enhancing biodiversity and supporting its resilience in the CAZ. On balance, Policy PV2 is expected to have mixed minor positive and minor negative effects in relation to IIA objective 8: Biodiversity and geodiversity.

6.352 Policy PV2 includes clauses to sustain and enhance the world-renowned cultural and heritage assets in the CAZ (including its two World Heritage Sites) and its distinct built environment. The Strategic CAZ Diagram identifies the World Heritage Sites, St. Paul's Cathedral and internationally significant areas of culture including the West End, the South Bank and Bankside, the Royal Albert Hall and South Kensington Museums, Tate Britain, the Barbican/Smithfield, Angel/Sadlers Wells, King's Cross and Shoreditch. The scale and types of new development that are supported by the CAZ policy can create opportunities to conserve and enhance the distinctive heritage assets of the CAZ and their settings but if not managed carefully can also put pressure on them. Therefore, Policy PV2 is expected to have mixed significant positive and minor negative effects in relation to IIA objective 9: Historic environment.

Reasonable alternatives

6.353 The GLA identified the following reasonable alternative options to Policy PV2 Central Activities Zones (CAZ):

- Option 1: Contract the existing CAZ boundary.
- Option 2: Expand the existing CAZ boundary.
- Option 3: Apply the approach of Mixed CAZ to the whole of the zone instead of the proposed Core CAZ and Mixed CAZ approach.

6.354 Contracting the CAZ under Option 1 would mean not fully capitalising on its exceptional public transport connectivity to support agglomerations of CAZ strategic functions, resulting in less efficient use of land. This could lead to a significant

negative effect on IIA objective 1: Best use of land and resources. Contracting the zone may result in marginal gains to housing delivery as the policy approach to Core CAZ and Mixed CAZ would not apply outside the CAZ. This might result in a minor positive effect on IIA objective 2: Housing. Option 1 would diminish the full economic potential of the CAZ, and contributions to the UK and London economy, and employment. It could also diminish the priority afforded to economic uses in the parts of the CAZ that are removed. This could result in a significant negative effect on IIA objective 3: Economic potential. Contracting the CAZ could also diminish its unique nature and the diverse mix of places that make it attractive to businesses, workers, visitors and residents, resulting in a significant negative effect on IIA objective 4: Successful placemaking.

6.355 Option 2 would reduce potential housing capacity in places where the zone is extended, resulting in a significant negative effect on IIA objective 2: Housing. Expanding the CAZ could bring in other areas of economic activity on the fringe of the CAZ, which would result in a significant positive effect on IIA objective 3: Economic potential. Although, any additional positive economic benefits compared to Policy PV2 might be limited as the expanded areas might not have the same agglomeration or connectivity benefits as the CAZ as they are not prime locations.

6.356 Promoting a purely Mixed CAZ approach under Option 3 to create areas that are mixed commercial and residential in character may result in a minor positive effect on IIA objective 2: Housing through additional housing delivery. However, if this approach were to be taken across the whole of the CAZ it could significantly undermine its internationally important roles and agglomerations of commercial, innovation, creative industries, culture, the experience economy and 24-hour uses which are underpinned by the zone's exceptional public transport connectivity. These uses depend on a policy approach that ensures they are given due priority and are not compromised by new residential development. Applying a Mixed CAZ approach to the whole of the CAZ could therefore result in significant negative effects on both IIA objectives 1: Best use of land and resources and 3: Economic potential, but to a lesser extent than the approach under Option 1. Policy PV2 with the current CAZ boundary was selected because it makes the most efficient use of land and maximises economic potential by being focused on agglomerations of CAZ strategic economic functions and capitalising on its extremely well-connected public transport infrastructure. The approach to Core CAZ and Mixed CAZ is the selected policy option as it gives due priority to CAZ strategic functions in Core CAZ areas, whilst enabling opportunities for more mixed-use development with CAZ strategic functions and residential uses in Mixed CAZ areas.

Policy PV3 Town centres and high streets

6.357 Policy PV3 makes best and most efficient use of land and resources by promoting all town centres as locations suitable for mixed-use and housing-led intensification, while also supporting the redevelopment of existing low-density edge-of-centre and out-of-centre retail and leisure parks (outside of SIL and LSIS). The policy promotes the town centre network as a framework for sustainable economic growth across the capital, recognising that town centres and high streets perform a range of different roles and functions. Policy PV3 also supports efficient use of land by promoting the activation of vacant premises and supporting flexibility for temporary or 'meanwhile' town centre uses. Therefore, Policy PV3 is expected to have a significant positive effect in relation to IIA objective 1: Best use of land and resources.

6.358 Policy PV3 promote all town centres as locations suitable for mixed-use and housing-led intensification. It supports the redevelopment, change of use and intensification of surplus commercial space to other uses including housing, whilst retaining active ground floor frontages for town centre uses. The policy supports the redevelopment of existing low-density edge-of-centre and out-of-centre retail and leisure parks (outside of SIL and LSIS) for housing intensification. Therefore, Policy PV3 is expected to have a significant positive effect in relation to IIA objective 2: Housing.

6.359 The policy promotes a positive approach to boost economic activity in town centres and high streets in a diverse mix of daytime and night-time town centre uses, supported by improvements to connectivity and access by public transport. It promotes town centres and high streets as locations for a flexible range of town centre uses with a broad mix of premises sizes and formats. It encourages plan-making authorities to identify locations within town centres and high streets that are suitable for late-night and/or 24-hour premises. Policy PV3 encourages plan-making authorities to designate markets complemented by other measures to improve their management and contribution to London's economy, culture, employment, business start-up opportunities and affordable workspace. Therefore, Policy PV3 is expected to have a significant positive effect in relation to IIA objective 3: Economic potential.

6.360 Policy PV3 supports successful, well-served mixed use places by promoting a flexible range of town centre uses and new housing, supported by improvements to connectivity and access by public transport, reducing car dependency, adopting a Healthy Streets approach and providing safe, inclusive and convenient routes from surrounding neighbourhoods by walking, wheeling and cycling. The policy supports improvements to the public realm, greening, safety and inclusion, including the delivery of a welcoming and barrier-free town centre and high street environment that

meets the needs of all. It also supports markets and their contribution to the vitality of town centres and high streets. In this context, Policy PV3 is expected to have a significant positive effect in relation to IIA objective 4: Successful placemaking.

6.361 The policy includes clauses that support positive outcomes that address the wider determinants of health, including employment, housing, social and cultural interaction, active travel modes, environmental quality and community safety. Policy PV3 encourages plan-making authorities to develop specific policies for their town centres and high streets including (where relevant) restrictions on concentrations of specific sui generis uses (such as betting shops, adult gaming centres, pawnbrokers, pay day loan shops and hot food takeaways) that can have a negative impact on town centre diversity, community safety and/or the health and well-being of Londoners. Policy PV3 also supports the provision of active ground floor frontages which help to provide passive surveillance and support community safety. The policy supports the intensification of development in town centres including the night-time economy. This could give rise to some negative impacts on health related to air quality, light and noise, including from late-night uses. On balance, Policy PV3 is expected to have mixed minor positive and minor negative effects in relation to IIA objective 5: Health and community safety.

6.362 Policy PV3 promotes town centres and high streets as a focus for Londoners' sense of place and local identity in the capital. It supports a diverse range of uses including social and cultural infrastructure which support social integration and good relations between different communities. The policy supports improvements to the public realm, in line with MBUL9, which will help to support the delivery of a welcoming and barrier-free town centre and high street environment that meets the needs of all Londoners and visitors. Policy PV3 encourages plan-making authorities to designate markets which provide opportunities for local employment, business start-up opportunities and affordable workspace as well as supporting their role in celebrating culture and London's diverse communities. Therefore, Policy PV3 is expected to have a significant positive effect in relation to IIA objective 6: Equality of opportunity.

6.363 Town centres and high streets are spatial forms of development which support lower carbon emissions through transport as a high proportion of trips are made by sustainable modes. The policy supports further improvements to connectivity and access by public transport, reducing car dependency and providing safe, inclusive and convenient routes from surrounding neighbourhoods by walking, wheeling and cycling. The policy includes a clause to promote and improve greening and resilience to environmental and climate risks such as flooding and heat. On balance, Policy PV3 is expected to have a minor positive effect in relation to IIA objective 7: Climate change.

6.364 Town centres often include green and other open spaces which support a range of biodiversity which are accessible for residents, workers and visitors to enjoy. Policy PV3 includes a clause to promote and improve greening. Therefore, Policy PV3 is expected to have a minor positive effect in relation to IIA objective 8: Biodiversity and geodiversity.

6.365 Policy PV3 is expected to have a negligible effect on IIA objective 9: Historic environment.

Reasonable alternatives

6.366 The GLA identified the following reasonable alternative options to Policy PV3 Town centres and high streets:

- Option 1: Prioritise the delivery of housing over commercial, cultural and social infrastructure uses at ground floor level in high street frontages outside of town centres.

6.367 By prioritising the delivery of housing, Option 1 would likely have a minor positive effect on IIA objective 2: Housing. High streets, including those outside of town centres, provide space for businesses as well as cultural and social infrastructure uses, and often at a lower cost compared to more central town centre locations. However, reducing the availability of space for economic uses at ground floor level in sustainable high street locations would result in a significant negative effect on IIA objective 3: Economic potential. Option 1 would also lead to fragmented town centre and high street frontages leading to a significant negative effect on IIA objective 4: Successful placemaking. By virtue of losing lower cost business space, cultural and social infrastructure, which is valued by London's diverse communities, the option would also likely result in a significant negative effect on IIA objective 6: Equality of opportunity. Policy PV3 was selected because it ensures that economic, cultural, social infrastructure uses and housing are supported in sustainable town centre and high street locations, supporting their long-term vitality and viability.

Policy PV4 Strategic economic clusters and corridors

6.368 Policy PV4 makes best and most efficient use of land and resources by supporting the growth of strategically important clusters of economic activity in locations that are, or can be made, accessible and well-connected by public transport and active travel modes. This will make efficient use of land by supporting densification in accessible locations. However, some of the strategic economic clusters are currently in locations with low public transport accessibility and if access to public transport and the ability to travel via active modes cannot be sufficiently

improved, it could result in densification of less accessible locations. Therefore, Policy PV4 is expected to have mixed minor positive and minor negative effects in relation to IIA objective 1: Best use of land and resources.

6.369 Policy PV4 is focused on supporting economic activity in a range of strategic locations. The policy indicates that development should provide or support a mix of uses across the cluster, as appropriate, including housing. Therefore, Policy PV4 is expected to have a minor positive effect in relation to IIA objective 2: Housing.

6.370 The policy promotes the growth of strategically important clusters of economic activity that are located outside of the CAZ, Northern Isle of Dogs, town centres and Strategic Industrial Locations. It also supports the growth of wider economic corridors in relevant locations for economic growth. The policy seeks to enhance the conditions that are conducive to economic growth including the provision of necessary infrastructure, land uses, public space and non-residential floorspace appropriate to the needs of businesses and institutions associated with the cluster including specialist economic sectors where relevant. Therefore, Policy PV4 is expected to have a significant positive effect in relation to IIA objective 3: Economic potential.

6.371 Policy PV4 supports well-served mixed use places by providing a mix of uses across the cluster, as appropriate, including housing and in locations that are, or can be made, accessible by public transport and active travel modes. The strategic economic corridors part of the policy supports the provision of necessary infrastructure, land uses, property and associated public space. In this context, Policy PV4 is expected to have a minor positive effect in relation to IIA objective 4: Successful placemaking.

6.372 The policy includes clauses that may support positive outcomes that address the wider determinants of health, including employment, housing, transport and a built environment that supports healthy behaviours (including provision of and improvements to public space and access by active travel modes). Overall, Policy PV4 is expected to have a minor positive effect in relation to IIA objective 5: Health and community safety.

6.373 The policy supports growth in employment in a range of locations in inner and outer London. This means that the jobs created in some of these locations may be closer to where people live in outer London compared to jobs in the CAZ for example. The policy will support job creation in a range of economic sectors requiring different levels of skills. Some of these jobs may not be accessible to all Londoners without investment in education and skills, delivery of affordable housing and accessible transport, which are outside of the remit of this policy. On balance, Policy PV4 is expected to have a minor positive effect in relation to IIA objective 6: Equality

of opportunity with some uncertainty on the potential effect in relation to the accessibility of employment for all Londoners which is contingent on complementary skills and education initiatives.

6.374 The policy includes clauses to ensure that locations are, or can be made, accessible and well-connected by public transport and active travel modes, helping to reduce carbon emissions through transport with a potential for a high proportion of trips to be made by sustainable modes. The additional development associated with the strategic economic clusters and corridors that is supported through the policy could result in an increase in CO₂ emissions. Whilst many of the strategic economic clusters are in locations that have good to excellent public transport accessibility level (PTAL), some of the clusters have low maximum and/or average PTAL. Therefore, there remains a risk of increased emissions associated with transport in some locations if PTAL scores cannot be raised sufficiently. On balance, Policy PV4 is expected to have mixed minor positive and minor negative effects in relation to IIA objective 7: Climate change.

6.375 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.376 The GLA identified the following reasonable alternative options to Policy PV4 Strategic economic clusters and corridors:

- Option 1: Only include Strategic Economic Cluster locations that have a maximum Public Transport Accessibility Level score of 3 or more.

6.377 Option 1 might reduce opportunities to improve the public transport accessibility of the low PTAL locations through new economic development. It would also reduce opportunities to support the growth of strategically important clusters of economic activity in the affected locations and so could result in a minor positive effect in relation to IIA objective 3: Economic potential. However, it might help to reduce the risk of increased emissions associated with low PTAL locations if public transport accessibility and connectivity cannot be raised sufficiently through new development. Therefore, it would likely have mixed minor positive and minor negative effects in relation to IIA objective 7: Climate change. Policy PV4 was selected because it maximises the potential to support the growth of strategically important clusters of economic activity across the capital whilst taking opportunities to improve public transport accessibility where feasible.

Policy PV5 Industrial land supporting housing growth

6.378 The policy sets the circumstances under which plan-making authorities should consider the release of industrial land and for non-designated industrial land, sets out the circumstances when non-industrial uses should be supported (including when the SAM score is greater than 5). This will support industrial intensification in appropriate locations that are well served by required infrastructure while enabling the reuse of previously developed land for other uses in locations that are less suitable for meeting industrial needs. Therefore, the policy is expected to have a minor positive effect in relation to IIA objective 1: Best use of land and resources.

6.379 Part B of Policy PV5 supports development of housing-led schemes in advance of release from industrial locations in identified locations. This will help to facilitate the delivery of additional housing in advance of plan-making authorities updating their Local Plans. Therefore, the policy is expected to have a minor positive effect in relation IIA objective 2: Housing.

6.380 . For designated industrial sites, the criteria for release to non-industrial uses ensures that sites which contribute to meeting strategic and local needs are protected. For non-designated industrial sites, the criteria for release to non-industrial uses excludes land which is within CAZ or a 3km buffer area surrounding its boundary and which is in existing or planned use for infrastructure uses that rely on industrial land. This approach includes appropriate flexibility for industrial release on non-designated sites while ensuring that locations that make a strategic contribution to London's economy are protected. Therefore, the policy is expected to have a significant positive effect in relation to IIA objective 3: Economic potential.

6.381 The policy enables the release of industrial land for housing in very accessible locations, minimising the need for private car use by residents. This will contribute to a reduction in greenhouse gas emissions and therefore Policy GLE2 is expected to have a minor positive effect in relation to IIA objective 7: Climate Change.

6.382 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.383 None identified.

Policy PV6 Metropolitan Open Land (MOL)

6.384 Policy PV6 establishes the framework for the designation and protection of Metropolitan Open Land (MOL), a London-specific strategic land-use designation. In

doing so, it supports a strategic objective to make the best and most efficient use of land and resources. It sets out the criteria and mechanisms for boroughs to designate MOL and affords strong protection to designated sites, recognising their metropolitan significance and distinct characteristics beyond other local open space designations. The policy seeks to restrict development on valuable greenfield land, which may indirectly help promote brownfield reuse, and safeguard important green infrastructure assets, including soils, water resources and multifunctional open spaces. Across London various social infrastructure uses, including sports and recreation, as well as many burial sites, are protected as MOL owing to their accessibility, green character and significance. Although not the main function of the policy, the protections it affords also help to maintain London's burial supply needs. As a result, the policy is expected to have a minor positive effect in relation to IIA objective 1: Best use of land and resources.

6.385 The policy's restrictions on development and its protection of designated MOL would limit the supply of land in London for development, especially for housing given that many sites are relatively well connected and accessible. The policy is therefore expected to have a minor negative effect in relation to IIA objective 2: Housing.

6.386 The policy helps to create and preserve successful places within London by seeking to protect and enhance strategically important breaks within the built-up urban area, with an emphasis on maintaining landscape character, biodiversity value and public accessibility. Such spaces deliver environmental, social and health benefits and contribute to local distinctiveness while reducing landscape vulnerability. Accordingly, the policy is expected to have a minor positive effect in relation to IIA objective 4: Successful placemaking.

6.387 Access to nature, green spaces and to facilities for sports and recreation is critical for health and wellbeing. By protecting and enhancing access to green space, sports and recreation facilities, Policy PV6 supports improved health and wellbeing outcomes across London. Publicly accessible MOL offers opportunities for contact with nature, physical activity, active travel and tranquillity. Regardless of access arrangements, all MOL that is formed of green space also contributes to mitigating air and noise pollution and reducing urban heat impacts. Given the metropolitan catchment and scale of these spaces, and the requirement for borough-led enhancement strategies addressing accessibility, inclusivity and safety, the policy is expected to have a significant positive effect in relation to IIA objective 5: Health and community safety.

6.388 By providing strong protections for existing MOL, as well as setting expectations for the enhancement of MOL, including through improved access, Policy PV6 will help to preserve and improve access to key social and green

infrastructure across London. Given that access to and availability of such infrastructure varies greatly across the city, and that designated MOL includes sites of metropolitan significance, the policy is expected to have a minor positive effect in relation to IIA objective 6: Equality of opportunity.

6.389 The policy will help to improve the climate resilience of London's places and people by protecting extensive areas of green infrastructure and breaks in the built-up area. These perform critical functions in alleviating climate risks, for instance from exacerbating the urban heat island effect by restricting increases in the net built-up area and supporting the delivery of strategic flood risk infrastructure. The policy will also help support the creation and protection of new carbon sinks, or restoration of existing sinks such as healthy soils, mature planting and areas of woodland. In doing so, the policy will help to strengthen London's natural environment by protecting its most valuable green features and infrastructure and expecting strategies for their maintenance and enhancement. With its assumptions around improving public access and opportunities for linking spaces up to form green links, the aims will also support active travel which will help to reduce reliance on emissions-based travel. Therefore, the policy is expected to have a significant positive effect in relation to IIA objective 7: Climate change.

6.390 For similar reasons to those set out above, the policy will help protect London's biodiversity and support its resilience. Expectations to consider opportunities for the enhancement and expansion of the network of MOL will help enhance the connectivity and functionality of London's green and blue infrastructure and presents opportunities for greater protections of strategically significant wildlife sites. The policy is therefore expected to have a significant positive effect in relation to IIA objective 8: Biodiversity and geodiversity.

6.391 Finally, the criteria for the designation of new MOL includes the recognition of extensive tracts of green spaces with historic features or landscapes that contribute to the city's character and setting. This may include both designated and non-designated heritage assets and, with expectations for enhancements over time, the policy will support the conservation and enhancement, and enjoyment of heritage assets. The policy is therefore expected to have a minor positive effect in relation to IIA objective 9: Historic environment.

6.392 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.393 The GLA identified the following reasonable alternative options to Policy PV6 Metropolitan Open Land:

- Option 1: Maintain current approach within London Plan 2021 – i.e. continue to directly link MOL policy protections to those of national Green Belt policy – but with exemptions made to specific NPPF paragraphs.
- Option 2: Use version as drafted, but with additional development management clause to allow for selective releases of MOL for major housing where specific tests are met that might constitute Very Special Circumstances.

6.394 Option 1 would have reduced certainty and weaken the robustness of MOL protection compared to Policy PV6, in addition to missing the opportunity to clarify the definition for new MOL as per the suggested drafting. Despite some similarities, Green Belt and MOL designations have fully distinct purposes, criteria and definitions. Regardless of any exceptions made, maintaining a direct link to national Green Belt policy would fail to acknowledge these differences and would fail to clearly signal to decision-makers and the public that the framework for Green Belt management introduced through the NPPF should not apply to MOL. In particular, policies relating to the need to review Green Belt boundaries where there is an unmet development need and those relating to grey belt have, since the publication of the 2024 NPPF, been erroneously applied to MOL by some parties as a result of the lack of clarity that this has caused. Therefore, Option 1 is expected to have minor negative effects in relation to objectives 1: Best use of land and resources, 4: Successful placemaking, 6: Equality of opportunity and 9: Historic environment due to the potential losses of MOL it might result in and that it would not introduce the extra recognition and protection of historic features or landscapes as Policy PV6. A downgrading to minor positive effects would be expected against IIA objectives 5: Health and community safety, 7: Climate change and 8: Biodiversity and geodiversity for the same reasons. Risks to the effectiveness of any exemptions applied to Green Belt development though future amendments to the NPPF could even result in a further downgrading to minor negative effects against these same objectives. Given that such incremental losses of MOL would likely be for the release for housing, Option 1 is expected to have a minor positive effect against IIA objective 2: Housing.

6.395 Option 2 would increase the land supply for housing and potentially economic uses and is therefore expected to have minor positive effects against IIA objectives 2: Housing and 3: Economic potential. It would likely result in mixed minor positive and minor negative effects against IIA objectives 1: Best use of land and resources and 4: Successful placemaking, as it would allow for the intensification of land in highly accessible locations which may support compact, dense and sustainable forms of development with integrated landscaping and infrastructure provision. However, the loss of greenfield land and landscape features of metropolitan importance would fail to promote brownfield development or protect distinctive landscape features, including important breaks in the built-up area and accessible green spaces. The

resulting MOL releases, especially in light of the levels of uncertainty in terms of the number of spaces impacted, would result in minor negative effects against IIA objectives 5: Health and community safety, 7: Climate change and 8: Biodiversity and geodiversity, with high levels of uncertainty. Mixed minor positive and minor negative effects are expected against IIA objectives 6: Equality of opportunity and 9: Historic environment, as enabling development on MOL has the potential to increase public access to existing private spaces (as reflected in the criteria around exceptional circumstances within PV6), or to facilitate the conservation and enhancement of certain historic features. However, without certainty on the extent of MOL caught by any such criteria, it is likely that some historical features or landscapes, and spaces which may not be publicly accessible but provide opportunities for some communities to access spaces for sports, recreation or nature, could be lost or impacted. Policy PV6 was selected because it was considered optimal in balancing the Mayor's ambitions to ensure that MOL is afforded strong protections and its function and quality enhanced, whilst removing ambiguity caused by changes to national Green Belt policies. It also balances the need to explore all sources of potential supply for housing against the critical value that MOL hold for Londoners and the environment.

Policy PV7 Sustainable development and enhancement of the green belt

6.396 Policy PV7 seeks to ensure that any Green Belt release required to meet London's objectively assessed development needs is in the most sustainable locations and makes the most efficient use of land. The policy directs development to locations capable of supporting dense, sustainable forms of growth in close proximity to public transport, maximising the use of existing infrastructure and minimising land take. For residential development, specific expectations on form and density will avoid land intensive development and ensure the critical mass needed to support infrastructure investment, including public transport. By promoting a dense, accessible, car-light form of housing development, the level of sprawl will be considerably reduced. Conversely, the policy facilitates the release of substantial areas of Green Belt land and does not explicitly prioritise brownfield reuse. This will likely result in a net loss of greenfield land and may risk the loss of higher grade agricultural land. Overall, the policy is expected to have mixed significant positive and significant negative effects in relation to IIA objective 1: Best use of land and resources.

6.397 The policy will have a transformative effect on the scale, type and diversity of housing delivery in London by substantially increasing the supply of land available for housing. The policy establishes strategic exceptional circumstances to justify the release of a limited proportion of London's Green Belt that is most capable of

accommodating growth, particularly in locations with relatively high public transport accessibility. Therefore, Policy PV7 is expected to have a significant positive effect in relation to IIA objective 2: Housing. This significant positive effect is coupled with a minor negative effect because despite the above, the policy still restricts major release of Green Belt land for housing outside of the Broad Locations for Growth (BLGs) – even where sites are located near rail stations or comprise grey belt land.

6.398 The policy is also expected to have a substantial effect on the scale, diversity and delivery of London's economy by considerably increasing the supply of land available for economic uses, particularly industrial development. Through the establishment of strategic exceptional circumstances for the release of Green Belt land within identified BLGs, the policy provides a major new contribution to London's employment land supply, responding directly to sustained and estimated demand for industrial uses such as logistics and freight. However, the strict controls on the application of the 'sustainable locations' test and the fact the policy restricts major release of Green Belt land for industrial uses outside of the identified BLGs, including where sites comprise grey belt land, could have adverse effects on the supply of industrial land. Although the BLG-focused approach enables more targeted, plan-led growth, it reduces potential industrial supply in other locations that might otherwise meet NPPF grey belt criteria. Overall, therefore, Policy PB7 is expected to have mixed significant positive and minor negative effects in relation to IIA objective 3: Economic potential.

6.399 The policy directs development to highly accessible locations well served by public transport and supporting infrastructure, with density and scale expectations designed to sustain a wide range of services and facilities. This will support the creation of well-served and successful places. The policy also requires the preparation of locally led, landscape and vision based masterplanning objectives and principles, supporting neighbourhood distinctiveness that responds positively to landscape character and features and embeds active travel, safety and high-quality public realm into site design. Interim density expectations are set on the assumption that a proportion of land within BLGs will be reserved for accessible green space, natural features and areas subject to environmental or physical constraints, which will ensure that new development contributes to the quality and enjoyment of local areas. Despite this, the policy could result in a considerable quantum of development in a greenfield context – the development of which will likely result in adverse effects on the landscape and landscape features, even with mitigation. In addition, while there is an expectation in the policy that building heights will step down further from transport nodes and to respond to existing urban areas, with design criteria allowing for some variation in built form, the overall policy requirements regarding density and building height may lead to a contrast with the established character of adjoining areas. Overall, the policy is expected to have mixed significant positive and minor

negative effects in relation to IIA objective 4: Successful placemaking, with some uncertainty

6.400 The policy's emphasis on landscape led design is intended to promote inclusive, walkable environments that support active travel and provide good access to nature, with beneficial effects on health and wellbeing. However, some BLGs may also contain land that is currently publicly accessible, including routes protected under the Countryside and Rights of Way Act 2000, which may be lost or diverted during development thereby reducing access to recreational opportunities. While industrial uses are directed to locations in close proximity to the strategic road network which should help to alleviate congestion impacts, the concentration of new industrial development within BLGs is likely to lead to increased traffic flows and associated emissions which risks increasing air pollution. Policy PV7 is therefore expected to have mixed minor positive and minor negative effects in relation to IIA objective 5: Health and community safety.

6.401 The policy's ambitions to radically increase the quantum and diversity of housing supply, as discussed under IIA objective 2, also has the potential to improve equality of access to decent housing for those who need it the most. In addition to greatly increasing the overall stock of affordable units, by prioritising locations which are accessible by public transport, access to these new affordable homes will not be contingent on access to a private vehicle, which may be unviable for many households in London. Policy expectations around the integration of new and improved accessible green space also supports aims to provide more equitable access to nature and space for recreation. Policy PV7 is therefore expected to have a minor positive effect in relation to IIA objective 6: Equality of opportunity.

6.402 Through facilitating the release of greenfield land, the policy may result in the loss of existing carbon sinks, including soils, trees and natural vegetation, and may increase exposure to climate risks such as the urban heat island effect. However, a range of mitigation measures are embedded within the policy to reduce these impacts. These include a strong emphasis on landscape led masterplanning, the integration of urban greening/sustainable drainage systems (SuDS), and interim density assumptions that allow significant proportions of sites to remain undeveloped or be landscaped as accessible green or natural spaces. These requirements help mitigate environmental impacts and enhance climate resilience, for example through the integration of natural drainage and landscape features. In addition, the expectation that boroughs identify opportunities to enhance the remaining Green Belt supports the delivery of multifunctional landscapes, including improved tree planting and natural flood management. Overall, the policy is expected to have mixed minor positive and minor negative effects in relation to IIA objective 7: Climate change.

6.403 Greenfield development may result in the loss of open countryside, including areas containing a range of habitats. However, the focus on targeted, higher density development reduces the overall amount of land required to meet development needs and the policy sets expectations for nature and biodiversity to be integrated into development proposals, promoting landscape led outcomes and ecological enhancement. This has the potential to limit wider habitat loss. Requirements for boroughs to proactively identify opportunities to enhance the remaining Green Belt further support improvements in biodiversity and ecosystem services, including through strategic environmental enhancements and rewilding initiatives. These mechanisms also provide a means to secure funding to deliver biodiversity gains beyond the BLGs. The policy is therefore expected to have mixed minor positive and minor negative effects in relation to IIA objective 8: Biodiversity and geodiversity.

6.404 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.405 The GLA identified the following reasonable alternative options to Policy PV7 Green Belt:

- Option 1: Direct Green Belt releases and associated design expectations to grey belt only rather than direct to identified BLGs.
- Option 2: To remove figure 6.4 which directs sustainable locations for housing to specific rail stations, instead relying on the NPPF rail station definition.
- Option 3: To remove figure 6.5, which directs sustainable locations for industrial to only specific junctions, instead relying on proximity to either any part or any junction of the strategic road network.

6.406 Option 1 would reduce the likelihood of fundamental impacts upon the Green Belt purposes through the release of grey belt land, which would de-risk the process of Green Belt release and likely increase the speed of delivery. However, housing delivery would suffer in terms of the overall number and diversity of units provided, unless a far greater proportion of land was released from the Green Belt. Therefore, Option 1 is expected to have mixed minor positive and minor negative effects against IIA objective 2: Housing.

6.407 The Mayor's London-wide Green Belt assessment has shown that the distribution of land with potential to meet the definition of grey belt is highly fragmented across London and generally does not align well with existing infrastructure. Option 1 would therefore fail to optimise delivery around existing infrastructure and would not allow for dense, car-light and sustainable forms of

development. The fragmented nature of development would also mean that opportunities to capitalise on economies of scale for existing infrastructure, as well as critical mass for the delivery of new or improved high quality infrastructure, would not be achieved in most cases. It would also weaken the strength of strategic masterplanning objectives and green infrastructure delivery within BLGs due to a lack of contiguous sites. As a result, such an approach would consistently perform more poorly against all IIA objectives compared to Policy PV7. Mixed significant negative and minor positive effects are expected in relation to IIA objective 1: Best use of land and resources, while mixed minor positive and minor negative effects are expected against IIA objectives 3: Economic potential and 4: Successful placemaking.

6.408 The expected positive effects discussed under IIA objective 5: Health and community safety in relation to Policy PV7 would be diminished under Option 1 due to the fragmented nature of development, in that people would likely need to travel further and potentially via private car, which would increase air pollution and discourage active travel and its beneficial effects on health and wellbeing. However, the masterplanning principles to underpin releases may help mitigate this. Therefore, Option 1 is expected to have mixed minor positive and minor negative effects in relation to IIA objective 5. The lack of equitable access to new homes via high quality public transport would result in a negligible effect against IIA objective 6: Equity of opportunity, although it is acknowledged that housing delivery would support the availability of affordable housing. Minor negative effects are expected against the remaining environmental IIA objectives due to the scale of additional land that would be required to accommodate the same quantum of development. There would be no change in relation to IIA objective 9: Historic environment.

6.409 Option 2 would rely on the national standards set out within the emerging draft NPPF of four trains per hour overall (Dec 2025 consultation version, footnote 26), in terms of defining sustainable locations for development. This would have the effect of bringing additional land into scope for potential release by widening the area around BLGs, which would likely support increased housing delivery. Therefore, the significant positive effect against IIA objective 2: Housing would be to a greater extent than the significant positive effect Policy PV7 receives against IIA objective 2. However, relying on such stations would result in some low-density, sprawling development. Therefore, Option 2 would somewhat fail to optimise land released from the Green Belt, delivering a disproportionately small number of additional dwellings for the amount of additional land, resources and infrastructure required. Overall, the effects would remain the same as the effects under Policy PV7. However, the mixed significant positive and significant negative effects against IIA objective 1: Best use of land and resources would be to a lesser extent than under Policy PV7 due to the fact the greenfield land surrounding the stations would not be as sustainable as that described under Policy PV7. The effect against IIA objective 3:

Economic potential would be negligible, as Option 2 focuses on housing delivery, not employment delivery.

6.410 Option 3 would allow greater flexibility on the locations for industrial release in and around the BLGs. This could enhance the supply of industrial land and therefore a significant positive effect is expected in relation to IIA objective 3: Economic potential. However, locating industrial development on any part or any junction of the strategic road network may result in development taking place in locations that are not sustainable. This could result in an increased dependence on private vehicles, which contribute towards air pollution with adverse effects on people's health, in addition to biodiversity. Greenhouse gas emissions generated by private vehicles also contribute to the greenhouse gas effect and increased temperatures globally. Therefore, minor negative effects are expected in relation to IIA objectives 5: Health and community safety, 7: Climate change and 8: Biodiversity and geodiversity. The remaining effects would be negligible. Policy PV7 was selected because it was considered to represent the most optimal solution for the Mayor to ensure that any Green Belt releases in London are on the basis of sustainable locations and forms of development, and in line with a strategic pattern of growth whereby the overall cumulative effects can be appropriately assessed and mitigated against.

Policy PV8 Strategic and local views

6.411 Policy PV8 designates 28 strategic views that look towards Strategically Important Landmarks (St Paul's Cathedral, the Palace of Westminster and the Tower of London) and other landmarks. Each of the 28 strategic views are from a well-known public space which is accessible and free to enter. These views contribute to London's character and identity as a global city. The preservation of these strategic views contributes to the distinctiveness of London and its attractiveness as an iconic destination and cultural hub. This will help to sustain London's built environment as a source of employment and tourism. Therefore, the policy is expected to have a minor positive effect in relation to IIA objective 3: Economic potential.

6.412 The policy requires planning authorities to include all relevant London Views Management Framework (LVMF) Viewing Locations, Protected Vistas and Protected Silhouettes in their Local Plans, and development proposals are required to make a positive contribution to the characteristics and composition of Strategic Views and their landmark elements. This will support the protection of important aspects of London's townscape and character, promoting and enhancing distinctiveness and sense of place and adding to people's understanding and enjoyment of London's place-based assets. The policy also promotes the designation of important local views in Local Plans, which is important in defining the character of individual

boroughs and regions of London. Overall, the policy is expected to have a significant positive effect in relation to IIA objective 4: Successful placemaking.

6.413 The LVMF identifies and protects aspects of the strategic views that contribute to the authenticity, integrity, and attributes of Outstanding Universal Value (OUV) of the three World Heritage Sites (WHS). By requiring Local Plans to be consistent with the LVMF, the policy supports the conservation and enhancement of heritage assets. In regard to development proposals, Policy PV8 is explicit that where there is a Protected Vista, development which exceeds the threshold height of a Landmark Viewing Corridor should be refused, and that development in the Wider Setting Consultation Area should preserve or enhance a viewer's ability to recognise and appreciate the Strategically Important Landmark. This supports a greater understanding of London's historic environment and will help to ensure that risks to the significance of heritage assets are appropriately managed. Therefore, the policy is expected to have a significant positive effect in relation to IIA objective 9: Historic environment.

6.414 The policy is not likely to have an effect on any of the other IIA objectives.

Reasonable alternatives

6.415 None identified.

Chapter 7

Cumulative effects

7.1 This chapter presents an assessment of the cumulative effects of the draft London Plan. It begins by presenting the total effects of all of the policies in the draft London Plan in **Table 7.1**. This is followed by a discussion on the likely cumulative and synergistic effects of the draft London Plan on each of the IIA objectives.

7.2 Cumulative effects are all of the effects of a plan, plus other actions including people's behaviour and other underlying trends, while synergistic effects are a subset of cumulative effects, where effects interact to produce a total effect greater than the sum of the individual effects. Unless otherwise stated, the effects are assumed to be long-term and permanent.

7.3 The likely cumulative effects of the draft London Plan on each of the IIA objectives are presented in **Table 7.2**.

Table 7.1: Total effects of the draft London Plan

Policy	IIA1: Best use of land and resources	IIA2: Housing	IIA3: Economic potential	IIA4: Successful placemaking	IIA5: Health and community safety	IIA6: Equality of opportunity	IIA7: Climate change	IIA8: Biodiversity and geodiversity	IIA9: Historic environment
Policy MBUL1 Spatial strategy	++/-	++/-	++	+	+/-	+	+/-	+/-	+/-?
Policy MBUL2 Optimising the use of land and site capacity	++	++?	0	++	+	0	+/-	+/-	0
Policy MBUL3 Tall buildings	++/-	0	+	++	+	0	-	0	+
Policy MBUL4 Utilities – capacity, connectivity, and resilience	0	0	+	0	0	0	+	0	0
Policy MBUL5 Sustainable transport to enable London's growth	+	+	+	++	++	+	+	+	0
Policy MBUL6 High quality design for a growing, changing city	+	0	0	++	+	+	+	0	0
Policy MBUL7 London's heritage	0	0	+	+	0	+	+	0	++
Policy MBUL8 Inclusive design	0	+	+	+	+	++	0	0	0
Policy MBUL9 Healthy streets and public realm	+	0	+	++	++	++	+	+	0
Policy MBUL10 Security and safety	0	0	0	0	++	+	-	-	0
Policy HN1 Increasing London's housing stock	++/-	++/-	+	0	+	+	0	0	0
Policy HN2 Protecting and reshaping housing	+	++	0	0	+	+	?	0	0
Policy HN3 Delivering affordable housing	0	++	+	+/-	+	+	0	0	0
Policy HN4 Gypsy and Traveller accommodation	0	++	0	0	+	++	0	0	0
Policy HN5 Managing specialist accommodation	0	++	+	0	+	++	+	0	0
Policy HN6 Build to rent	0	++	0	0	0	+	0	0	0
Policy HN7 Housing size mix	0	+	0	0	0	+	0	0	0
Policy HN8 Housing design	0	++?	0	+	++	+	+	+	0
Policy HN9 Accessible housing	0	++	0	0	++	++	0	0	0
Policy HN10 Burial space	+	0	0	0	0	++	0	+	0
Policy GLE1 Sufficient and appropriate employment space	++	0	++	+	+	+	-	0	0
Policy GLE2 Supply of industrial land	++/-	+	++	0	0	0	+	0	0
Policy GLE3 Data centres	+	0	++	0	-?	-?	+/-	0	0
Policy GLE4 Night-time economy	0	0	++	0	+	+	0	0	+
Policy GLE5 Culture and creative industries	+	0	++	++	+	+	+	0	0
Policy GLE6 Visitor infrastructure	+	+	++	+	+	+	+	0	0
Policy GLE7 Affordable workspace	0	0	++	+	0	++	0	0	0
Policy GLE8 Access to employment and skills	0	0	++	0	+	++	0	0	0
Policy GLE9 Aviation	+	0	+/-	0	+	+	++	0	0
Policy GLE10 Safeguarded Wharves	++/-	0	+	0	+/-	0	+	-	0
Policy GLE11 Circular economy	++	0	+	0	0	0	++	0	0

Policy	IIA1: Best use of land and resources	IIA2: Housing	IIA3: Economic potential	IIA4: Successful placemaking	IIA5: Health and community safety	IIA6: Equality of opportunity	IIA7: Climate change	IIA8: Biodiversity and geodiversity	IIA9: Historic environment
Policy GLE12 Waste	++	0	+	0	0	0	+	0	0
Policy GLE13 Aggregates and mineral resources	++	0	+	0	+	0	+	+	0
Policy GHR1 Energy efficiency	+	?	+/-	0	0	+	++	0	0
Policy GHR2 Low cost low carbon heat	++	0	+	0	0	+	++	0	0
Policy GHR3 Whole life carbon	++	0	0	0	0	0	++	0	0
Policy GHR4 Heat risk	0	?	0	0	+	+	++	+	0
Policy GHR5 Flood risk and drainage	+	0	+	0	+	+	++	+	0
Policy GHR6 Trees, biodiversity and geodiversity	+	0	0	+	+	+	+	++	0
Policy GHR7 Green infrastructure and Urban Greening Factor	0	0	0	+	+	0	+	+	0
Policy GHR8 Accessible green space	+	0	0	+	++	++	++	++	0
Policy GHR9 Clean and healthy waterways	++	0	0	+	+	+	+	++/-	+
Policy GHR10 Air quality	0	0	0	0	++	+	?	+	0
Policy GHR11 Cycle and car parking	+	?	0	+	+	+	++	0	0
Policy PV1 Brownfield First Opportunity Areas (BFOAs)	++	+	++	++	+	+	+	+	+
Policy PV2 Central Activities Zone (CAZ)	++	+	+	++	+/-	++?	+/-	+/-	++/-
Policy PV3 Town centres and high streets	++	++	++	++	+/-	++	+	+	0
Policy PV4 Strategic economic clusters and corridors	+/-	+	++	+	+	+	+/-	0	0
Policy PV5 Industrial land supporting housing growth	+	+	++	0	0	0	0	0	0
Policy PV6 Metropolitan Open Land (MOL)	+	-	0	+	++	+	++	++	+
Policy PV7 Sustainable development and enhancement of the green belt	++/--	++/-	++/-	++/-?	+/-	+	+/-	+/-	0
Policy PV8 Strategic and local views	0	0	+	++	0	0	0	0	++

IIA objective 1: Best use of land and resources

7.4 Pressure for development and competition between different land uses is increasing across London. The new standard method housing requirement means London needs to accommodate higher housing and growth targets than before, and even with higher density development, this cannot all be met on previously developed land, therefore some Green Belt land will need to be released. Without careful management this could lead to unsustainable patterns of development and inefficient use of land. Competing pressures for land also impact on the ability to provide necessary social, physical, and environmental infrastructure to support the growing population. Increased levels of development impact on the consumption and availability of finite resources including water, energy and mineral derived materials.

7.5 The draft London Plan seeks to make the best use of land by maximising intensification of the existing urban area and delivering as much of the required development as possible on brownfield land. Policy MBUL2 Optimising the use of land and site capacity requires plan-making authorities to take full advantage of existing and planned levels of sustainable transport connectivity, while also giving consideration to the scale, height and form of development to ensure efficient use of land. Likewise, Policy MBUL3 Tall buildings supports higher densities in a sustainable way, through the optimisation and efficient use of land. Policy PB1 Brownfield First Opportunity Areas (BFOAs) identifies opportunities for brownfield development, which is an efficient use of land and sometimes involves the reuse of existing, vacant buildings. However, due to the scale of development proposed in the draft London Plan, Policy MBUL1 Spatial strategy requires Local Plans to make provision for further strategic growth beyond the existing built-up area, including through Green Belt release in identified BLGs. This will involve the development of greenfield land that may be classed as high quality agricultural land, and so is a less efficient use of land but only comprises a small proportion of the overall growth (approximately 10%).

7.6 Overall, the draft London Plan is expected to have mixed significant positive and minor negative effects in relation to IIA objective 1: Best use of land and resources.

IIA objective 2: Housing

7.7 To date London's housing stock has not kept pace with population growth. Affordability pressures exist across all tenures, and London is becoming less accessible for families with children, key workers and marginalised Londoners. The draft London Plan seeks to deliver 558,000 new homes, which is just over 65% of the

standard method housing requirement (850,000). However, the evidence studies show that the full requirement cannot be met – even by optimising brownfield sites, increasing densification in more parts of London and releasing targeted areas of the Green Belt around existing public transport stations. Despite the draft London Plan not meeting the standard method housing requirement, it will contribute significantly to housing numbers in London. Policy MBUL1 Spatial Strategy outlines the ways in which Local Plans should support this level of delivery, which includes giving priority to the Growth Corridors, CAZ & the Northern Isle of Dogs, Brownfield First Opportunity Areas and BLGs. Delivery is also supported along growth corridors that extend beyond London's boundary (achieved through cross boundary co-ordination of opportunities), Green Belt release and on small sites. As part of this growth, affordable housing provision will be prioritised. This is particularly important in London where affordable housing delivery has been falling. Through Policy HN3 Delivering affordable housing, the draft London Plan seeks to deliver a large percentage of affordable homes, together with low-cost rent and intermediate homes – some of which will take the Fast Track Route through planning. However, in order to benefit overall delivery numbers, Policy MBUL1 states that some exceptions may be made in relation to the diversity of housing mix, which could limit the provision of affordable housing in the short term.

7.8 There is some potential tension between the policies in the draft London Plan that support new housing development (contained in Chapter 3 'Delivering the homes and neighbourhoods Londoners need' of the draft London Plan) and those that seek to protect and enhance the natural and built environment, such as Policies GHR6 Trees, biodiversity and geodiversity, GHR7 Green infrastructure and Urban Greening Factor and MBUL7 London's heritage. However, it is considered that such policies will serve to direct growth to the most appropriate locations within London, rather than limiting growth.

7.9 Overall, the draft London Plan is expected to have a significant positive (++) effect in relation to IIA objective 2: Housing, mixed with a minor negative effect due to not meeting the full standard method requirement and the potential exceptions to affordable housing priority in the short term.

IIA objective 3: Economic potential

7.10 London is the largest city in western Europe and a global hub for finance, technology, and culture. However, while economic output is growing, productivity has faltered, job quality is uneven and income inequality remains pronounced. Provision of sufficient employment and business space is vital to London's position as a leading global city as well as the ability of local economies to serve local populations.

The draft London Plan requires plan-making authorities to meet diverse economic needs by providing for a range of suitable business spaces. Policy GLE1 Sufficient and appropriate employment space requires employment spaces to be designed flexibly to accommodate a range of uses and occupier sizes, and to facilitate adaptation to future business and community needs. In terms of industrial land, Policy GLE2 Supply of industrial land seeks to meet the needs of businesses that rely on industrial land. Plan-making authorities are required to establish a strategy to meet their industrial needs, including re-activating vacant industrial land and repurposing any arising surplus land in commercial use. Policy MBUL1 outlines the spatial strategy for London, which seeks to build on the success of economic clusters and promotes greater connectivity via sustainable transport, which will help to unlock London's economic potential and improve access to employment opportunities.

7.11 Overall, the draft London Plan is expected to have a significant positive (++) effect in relation to IIA objective 3: Economic potential.

IIA objective 4: Successful placemaking

7.12 London is famous for its built environment and distinctive character that is synonymous with landscape and townscape features, and its combination of old and new. The Green Belt forms 22% of London's land area while 10% is designated Metropolitan Open Land. This includes spaces such as Richmond Park and Hampstead Heath. There are 27 designated views in London (the majority of which are focused along the River Thames), which include significant buildings or urban landscapes. New development will often make a positive contribution to these views. However, development can sometimes compromise the setting or visibility of key landmarks. Generally, though, growth provides an opportunity to enhance the built environment and create new, successful places.

7.13 The draft London Plan supports a significant amount of growth particularly in the existing built-up area and while this may alter some of the existing character, there is the potential to enhance it through the quality of development that is delivered. This will be influenced by Policy MBUL6 High quality design for a growing, changing city. The policy requires plan-making authorities to promote good design through the use of design codes and guidance. In determining planning applications, authorities are encouraged to check that development proposals enhance an area and respond positively to local distinctiveness, are of high-quality architectural design and maximise active frontages – all of which will contribute to the vibrancy of an area and help build new, successful places. There are also policies contained in the draft London Plan that seek to protect London's built environment. For example, Policy PV8 Strategic and local views including the London View Management Framework

seeks to preserve and enhance London's views while policies contained within the 'Creating a greener, healthier, and resilient city' chapter of the draft London Plan require Local Plans to secure things like enhancements to green infrastructure, including existing greenspace, which can contribute to the enjoyment and enhancement of place-based assets. Further to this, Policy MBUL3 Tall buildings sets an appropriate framework for the development of tall buildings so as to protect London's landscape and townscape while also supporting tall buildings where appropriate, as they can positively influence London's character and skyline.

7.14 There is also potential for some changes to more open landscapes in outer London where a smaller amount of the required development overall is directed to broad locations for growth in the Green Belt, as set out in Policy MBUL1 Spatial Strategy. However, Policy PV7 Sustainable development and enhancement of the green belt requires development proposals in these locations to meet the nationally set Golden Rules where applicable, and the relevant London Green Belt sustainable design criteria as set out box PV7B. This includes demonstrating a landscape-led approach which delivers high quality accessible green space within the BLG and integrates the development with the surrounding countryside and its key features.

7.15 Overall, the draft London Plan is expected to have a minor positive effect in relation to IIA objective 4: Successful placemaking.

IIA objective 5: Health and community safety

7.16 While London tends to have better health outcomes than the rest of the UK, stark health and socioeconomic inequalities, including ethnic inequalities, remain. Despite significant progress, London still exceeds the World Health Organisation's recommended health-based guidelines for air quality and air pollution from road transport remains an important source of emissions. Impacts of poor air quality do not fall equally across the city; poorer and Black, Asian and Minority Ethnic communities are more likely to live in areas with poorer air quality.

7.17 As part of the IIA, a Health Impact Assessment has been undertaken through the appraisal of policies against IIA objective 5: Health and community safety. The draft London Plan has a brownfield first focus and supports higher-density development in locations with good sustainable transport accessibility. Therefore, it will help to minimise reliance on the private car and contribute to reductions in associated air pollution. Policy GHR10 Air quality specifically seeks to reduce the extent to which Londoners are exposed to poor air quality and together with the Mayor's Transport Strategy (2018) and the London Environment Strategy (2018), has the potential to improve air quality in London over the plan period. This could have positive effects on people's wellbeing, in addition to encouraging walking and cycling

to public transport facilities. Further policies contained in the 'Creating a greener, healthier, and resilient city' chapter of the London Plan will also have positive effects in terms of people's health and wellbeing by reducing and mitigating overheating in London (Policy GHR4 Heat risk), providing accessible green spaces that people can use for recreational purposes (Policies GHR7 Green infrastructure and Urban Greening Factor and GHR8 Accessible green space) and ensuring waterways are clean (Policy GHR9 Clean and healthy waterways). Further to this, Policy MBUL1 Spatial Strategy includes a requirement for Local Plans to secure additional strategic healthcare, emergency services and criminal justice infrastructure, commensurate with expected housing-related population and spatial growth. Despite this, the scale of growth proposed in the draft London Plan and the increased density of development together with additional industrial growth locations for storage, distribution and data centres is still likely to give rise to some localised, temporary negative effects on health related to air quality, light and noise.

7.18 London is a relatively safe city when compared to other global cities and the likelihood of being a victim of crime is low in London. However, as a global city it is at higher risk of terrorist attacks than other cities in the UK. Heightened risks of threats to security can impact London's economic competitiveness and tourism. Violent crime in London is disproportionately concentrated in deprived areas, with significant local variations. A Community Safety Impact Assessment has also been undertaken as part of the IIA through IIA objective 5. Policies MBUL9 Healthy Streets and Public Realm and MBUL10 Security and safety in the Draft London Plan seek to deliver streets and a public realm that are welcoming, accessible and safe. The policies require plan-making authorities to work with a range of service providers (e.g. the Metropolitan Police Service, the London Fire Commissioner and the Ministry of Justice) to identify community safety needs and the provision of necessary infrastructure to maintain a safe and secure environment, while also referring to the Health and Safety Executive mapping of hazard zones. In terms of development management, development proposals should consider and incorporate design measures to address safety and security measures, including for women and girls, in addition to counter terrorism measures which should be proportionate to threat and consequence. Lastly, major developments of any height should meet the highest standards of fire safety.

7.19 Overall, the draft London Plan is expected to have mixed minor positive and minor negative effects in relation to IIA objective 5: Health and community safety.

IIA objective 6: Equality of opportunity

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

7.21 The IIA has considered the impacts of the London Plan policies on equality for all Londoners through effects identified in **Chapter 6** in relation to IIA objective 6: Equality of opportunity. A separate, standalone EqIA focusing on potential effects of the draft London Plan on groups with protected characteristics in the Equality Act 2010 can be found in **Appendix A** of this IIA Report.

7.22 The focus on sustainable development and the Good Growth objectives in the draft London Plan promotes accessible and inclusive development, close to a diverse range of existing and new employment opportunities, which has potential to improve overall levels of equality, as well as just for those with protected characteristics. As set out in **Appendix A**, the draft London Plan is also generally expected to have positive effects on people with protected characteristics (with the exception of marriage and civil partnership, as this characteristic is only protected in relation to discrimination in the workplace, which is not affected by the London Plan).

7.23 The policies on housing aim to provide affordable and diverse options, which ensures the accessibility needs of older people and people with disabilities and limited mobility are met (in particular, Policy HN5 Managing specialist accommodation and Policy HN9 Accessible housing). There is also specific support for Gypsies and Travellers and recognition of their cultural needs (Policy HN4 Gypsy and Traveller accommodation). The draft London Plan promotes inclusive growth through social infrastructure, employment opportunities and environmental protections (e.g. Policy MBUL9 Healthy streets and public realm, Policy GLE7 Affordable workspace, Policy GLE8 Access to employment and skills, Policy GHR6 Trees, biodiversity and geodiversity and Policy GHR10 Air quality), though some potential for adverse effects remains – particularly from localised air pollution linked to the scale of development or potentially polluting forms of development (e.g. industrial development and data centres). The green and health-focused policies further address inequalities by expanding access to nature and mitigating climate impacts (e.g. Policy GHR8 Accessible green space and Policy GHR4 Heat risk), while place-based approaches generally enhance accessibility, safety and local

opportunity (e.g. Policy PV3 Town centres and high streets), despite potential drawbacks linked to high density development and transport limitations.

7.24 Overall, the draft London Plan is expected to have a minor positive (+) effect in relation to IIA objective 6: Equality of opportunity.

IIA objective 7: Climate change

7.25 London's climate is changing, bringing more frequent and severe extreme weather events. Floods, droughts, and heatwaves have cost the city millions of pounds in recent years and harmed the health of many Londoners – particularly those in the most vulnerable communities. The draft London Plan through Policy MBUL1 Spatial strategy, seeks to maximise intensification of development in the existing urban area where sustainable transport accessibility is good, while delivering as much of the required development as possible on brownfield land. This, together with Policy MBUL5 Sustainable transport to enable London's growth, will help minimise greenhouse gas emissions associated with the car, as people will not need to travel far to reach services and facilities and can instead rely on public transport. However, the scale of development sought will likely contribute towards greenhouse gas emissions. This is particularly the case for industrial development and the provision of new data centres which despite mitigation efforts, contribute substantially towards CO₂ emissions. Policy GHR1 Energy efficiency will help mitigate this by requiring developments to go beyond national requirements in terms of energy efficiency, while also maximising opportunities for the provision and storage of renewable energy.

7.26 The scale of development proposed will involve increased density within the existing built-up area, which could exacerbate the urban heat island effect together with surface water flooding if not accompanied by climate-resilient design measures. Similarly, development of BLGs in the Green Belt would increase impermeable surfaces and contribute to surface water flooding. However, the draft London Plan requires mitigation of these effects through Policies GHR4 Heat risk and GHR5 Flood risk and drainage. Other policies, such as GHR6 Trees, biodiversity and geodiversity and GHR7 Green infrastructure and urban greening factor will help in adapting to the effects of climate change through the provision of trees for shading, and new green spaces and green features as part of development which provide natural sustainable drainage to slow down or retain surface water to reduce flood risk.

7.27 Overall, the draft London Plan is expected to have mixed minor positive and minor negative effects in relation to IIA objective 7: Climate change.

IIA objective 8: Biodiversity and geodiversity

7.28 London has a history of being a green city and is now one of the world's greenest cities, becoming the first National Park City in 2019. Around a third of the green space in London is natural habitats, while just under 15% is vegetated private gardens. Over 2.5% of London is made up of blue space, such as rivers, canals and reservoirs. In London, there are three SACs (Richmond Park, Wimbledon Common and Epping Forest) and two SPAs and Ramsar sites (Lee Valley and South West London Waterbodies). There are also several SACs, SPAs and Ramsar sites outside of London but which can be impacted by development in the city and visitors from London. Other important wildlife sites in London are Sites of Special Scientific Interest, National Nature Reserves, Local Nature Reserves and areas of ancient and semi-natural woodland and ancient replanted woodland, in addition to Sites of Importance for Nature Conservation. London is home to more than 18,000 species, including protected and rare species – many of which are underpinned and influenced by the city's geodiversity. The main bedrocks in London are chalk and London clay, with much of the surface geology made up of sand and gravel. The soils formed from this surface geology produce a complex mosaic of different habitats with distinct plants and wildlife.

7.29 Policy GHR6 Trees, biodiversity and geodiversity contained in the draft London Plan seeks to protect and enhance biodiversity and geodiversity in London by requiring plan-making authorities to protect habitats and species and use evidence from the LNRS to identify opportunities to support nature recovery by creating, expanding and connecting habitats and improving the ecological condition of sites. Further to this, the Draft London Plan and the LNRS together with the London Green Infrastructure Framework will help in the delivery of new or improved green infrastructure and inform habitat creation proposals. The prioritisation of brownfield intensification under Policy MBUL1 Spatial strategy will reduce pressure on greenfield land and designated sites and protected habitats, although it is noted that numerous designated biodiversity sites occur in the built-up area as well. The spatial strategy allows for targeted greenfield development within the identified Green Belt BLGs which could result in some loss of biodiversity, although Policy GHR6 will help mitigate this. Overall, however, the scale of development proposed in the draft London Plan is still likely to have some localised adverse effects on biodiversity.

7.30 Alongside this IIA, a separate Habitats Regulations Assessment of the draft London Plan has been undertaken to consider the potential for the draft London Plan to impact upon internationally designated biodiversity sites (SACs, SPAs and Ramsar sites). The HRA included a number of recommendations for amendments to policies contained in the draft London Plan – all of which were addressed in the final version of the draft London Plan. As a result, the HRA has concluded that, for most types of

effects considered, the draft London Plan will not have adverse effects on the integrity of SACs, SPAs and Ramsar sites in and around London. Air quality modelling is being conducted in relation to Epping Forest SAC in order to facilitate completion of appropriate assessment.

7.31 Overall, the draft London Plan is expected to have mixed minor positive and minor negative effects in relation to IIA objective 8: Biodiversity and geodiversity.

IIA objective 9: Historic environment

7.32 London is world-renowned for its heritage. It contains an abundance of heritage assets – all of which contribute significantly to its distinctive character and strong sense of place. The city contains four UNESCO World Heritage Sites (the Tower of London, Westminster, Maritime Greenwich and the Royal Botanic Gardens, Kew) and over 1,000 conservation areas that contain numerous listed buildings. Hundreds of scheduled monuments and registered parks and gardens are also present, in addition to one registered battlefield. Numerous Archaeological Priority Areas are also present across London.

7.33 The scale and intensification of growth required through Policy MBUL1 Spatial Strategy could create opportunities to conserve and enhance London's distinctive heritage assets and their settings. However, due to the extent of heritage assets in London and the scale of development proposed in the draft London Plan, a lot of development will likely take place within close proximity of heritage assets. This has the potential to cause harm to heritage assets and their settings. However, Policy MBUL7 London's heritage helps mitigate this. According to the policy, where plan-making authorities contain one of the four World Heritage Sites, they must include policies in their Development Plan which conserve and protect the World Heritage Site. Likewise, Policy PV2 Central Activities Zone (CAZ) seeks to sustain and enhance the CAZ's world-renowned heritage assets. Policy PV8 Strategic and local views including the London View Management Framework further protects the historic environment by designating Strategic Views, which look towards important landmarks (e.g. the Tower of London) that make a significant historic or cultural contribution to London.

7.34 Overall, the draft London Plan is expected to have mixed minor positive and minor negative effects in relation to IIA objective 9: Historic environment.

7.35 The overall, cumulative effects of the draft London Plan are shown in summary form in **Table 7.2**.

Table 7.2: Cumulative effects of the draft London Plan by IIA objective

IIA objective	Draft London Plan
IIA1: Best use of land and resources	++/-
IIA2: Housing	++/-
IIA3: Economic potential	++
IIA4: Successful placemaking	+
IIA5: Health and community safety	+/-
IIA6: Equality of opportunity	+
IIA7: Climate change	+/-
IIA8: Biodiversity and geodiversity	+/-
IIA9: Historic environment	+/-

Chapter 8

Monitoring

8.1 The SEA Regulations require that "the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action" and that the environmental report should provide information on "a description of the measures envisaged concerning monitoring". Monitoring proposals should be designed to provide information that can be used to highlight specific issues and significant effects, and which could help decision-making.

8.2 Although national Planning Practice Guidance states that monitoring should be focused on the significant environmental effects of implementing the plan, the reason for this is to enable plan-making authorities to identify unforeseen adverse effects at an early stage and to enable appropriate remedial actions. Since effects which the IIA expects to be minor may become significant and vice versa, monitoring measures have been proposed in this IIA Report in relation to all of the IIA objectives in the IIA framework. As the London Plan is implemented and the likely significant effects become more certain, the GLA may wish to narrow down the monitoring framework to focus on those effects of the London Plan likely to be significant.

8.3 The remainder of this chapter sets out a number of suggested indicators for monitoring the potential sustainability effects of implementing the London Plan. The data used for monitoring may sometimes be provided by outside bodies, for example the Environment Agency. It is therefore recommended that the GLA remain in dialogue with statutory environmental consultees and other stakeholders and works with them to agree the relevant sustainability effects to be monitored and to obtain information that is appropriate, up to date and reliable.

IIA objective 1: Best use of land and resources

Proposed monitoring indicators

- Proportion of homes consented on brownfield land
- Average net residential density on Green Belt development
- Waste self-sufficiency

IIA objective 2: Housing

Proposed monitoring indicators

- Number of new homes completed and approved
- Percentage of affordable housing approved and completed
- Proportion of homes meeting private amenity space standards in referable consents
- Percentage of London adults who say they have not been able to meet their housing payments over the last six months (or who have struggled to do so)
- Number of homeless households in temporary accommodation (arranged by London borough councils)

IIA objective 3: Economic potential

Proposed monitoring indicators

- Office space under construction and remaining pipeline
- Storage and logistics net completions and pipeline
- Affordable workspace secured (floorspace and £ contributions) as part of referable developments
- Number of domestic and international visitors to London

IIA objective 4: Successful placemaking

Proposed monitoring indicators

- Proportion of new homes in well-connected areas (SAM4+ or in Green Belt BLGs)
- Net loss of cultural venues and pubs as part of approved referable developments
- Vacancy rate of retail premises on high streets (percentage)
- Percentage of adults very or fairly satisfied with their neighbourhood area as a place to live

IIA objective 5: Health and community safety

Proposed monitoring indicators

- Hectares of new accessible green space secured through referable developments consents
- Percentage of residential addresses that fall within an Area of Deficiency in access to Public Open Space (AoDPOS), 'local/small/pocket' definition
- Proportion of applicable approved developments achieving at least Air Quality Neutral standards
- Annual mean concentrations of nitrogen dioxide (NO₂) and PM_{2.5} particulate
- Healthy life expectancy/premature death from cardiovascular disease
- Proportion of children in Year 6 that are overweight or obese

IIA objective 6: Equality of opportunity

Proposed monitoring indicators

- Number and percentage of wheelchair accessible homes approved and completed
- Proportion of referable residential consents that have undergone an independent design review
- 90:10 ratio of household income inequality (after housing costs)
- Proportion of Londoners struggling to make ends meet or having to go without basic needs

IIA objective 7: Climate change

Proposed monitoring indicators

- Greenhouse gas emissions (MtCO₂e) in London
- Proportion of approved referable developments meeting or below Energy Use Intensity (EUI) targets
- Proportion of approved referable applications achieving greenfield runoff rate

- Number of properties flooded in London per year
- Proportion of residential development schemes compliant with parking standards
- Excess deaths during periods of heat

IIA objective 8: Biodiversity and geodiversity

Proposed monitoring indicators

- Hectares of nature recovery/secured through referable development (direct or through BNG contributions)
- Net loss/gain of Metropolitan Open Land (MOL)
- Total area designated a site of importance for nature conservation (SINC) in hectares
- Percentage of Londoners who agree/strongly agree/completely agree that they 'feel part of nature'

IIA objective 9: Historic environment

Proposed monitoring indicators

- Number of referable consents resulting in overall heritage harm to the Outstanding Universal Value of a London World Heritage Site

Chapter 9

Conclusions

9.1 The Integrated Impact Assessment demonstrates that the draft London Plan provides a comprehensive and robust framework for guiding London's growth over the next 20 years in a way that is more sustainable, inclusive and resilient. By integrating sustainability appraisal, strategic environmental assessment, health, equality and community safety considerations into a single process, the IIA has helped to ensure that the draft London Plan responds holistically to the complex social, environmental and economic challenges facing the city.

9.2 Overall, the assessment shows that the draft London Plan has strong potential to deliver significant positive outcomes, particularly in supporting housing delivery, economic growth, and improved health and wellbeing. It does this through an emphasis on optimising land use, promoting the Good Growth principles, and enhancing access to infrastructure and services. At the same time, the Plan provides a clear strategic approach to tackling climate change, promoting biodiversity net gain, and improving environmental quality, helping to build London's long-term resilience.

9.3 However, the IIA also identifies that the scale of growth required, particularly the need to deliver substantially higher levels of housing, will inevitably result in some potential adverse effects. These include pressures on greenfield land, biodiversity, infrastructure capacity and local character, as well as risks of exacerbating inequalities if growth is not carefully managed. The assessment highlights the importance of mitigation provided by many of the draft policies, effective implementation, and ongoing monitoring to ensure that negative effects are minimised and that benefits are maximised.

9.4 In conclusion, the draft London Plan represents a positive and necessary step towards achieving sustainable development in London and improved outcomes for all Londoners over the plan period. The IIA provides assurance that environmental, social and economic considerations have been embedded throughout the plan-making process.

Next steps

9.5 This IIA Report will be available for comment alongside the draft London Plan. The consultation responses on the draft London Plan and this IIA Report will be taken into account in the next stages of plan-making.

Appendix A

Equality Impact Assessment

Introduction

A.1 This report presents the findings of an assessment of the likely effects of the Draft London Plan (2026) on equality issues.

A.2 The requirement to undertake formal Equality Impact Assessment (EqIA) of plans was introduced in the Equality Act 2010 but was abolished in 2012. Despite this, authorities are still required to have regard to the provisions of the Equality Act, namely the Public Sector Duty which requires public authorities to have due regard for equalities considerations when exercising their functions. In fulfilling this duty, it is useful to produce a written record of equality issues having been specifically considered. That is the purpose of this report.

A.3 The Equality Act 2010 identifies nine 'protected characteristics' and seeks to protect people from discrimination on the basis of these characteristics:

- Age – Protection against unfair treatment because of age (young or old).
- Disability – A physical or mental impairment that has a substantial and long-term negative effect on normal daily activities.
- Gender reassignment – Protects people who are transitioning or have transitioned from one gender to another.
- Marriage and civil partnership – Protection from discrimination applies only in the workplace (such as recruitment, pay, promotions, or dismissal).
- Pregnancy and maternity – Covers pregnancy, maternity leave, and related rights.
- Race – Includes colour, nationality, and ethnic or national origins.
- Religion or belief – Includes any religion, religious belief, or non-belief (e.g. atheism).
- Sex – Being male or female.
- Sexual orientation – Attraction towards people of the same sex, opposite sex, or both.

A.4 There are three main duties set out in the Equality Act 2010, which public authorities including Greater London Authority (GLA) must meet in exercising their functions:

- To eliminate discrimination, harassment, victimisation and other conduct that is prohibited under the Act.
- To advance equality of opportunity between persons who share relevant protected characteristics and persons who do not share it.
- To foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

A.5 This Equality Impact Assessment focuses on the nine protected characteristics set out in the Equality Act 2010, in line with the Mayor's duties under the Public Sector Equality Duty. While the Mayor considers wider factors such as socio-economic disadvantage in other strategies and statutory duties under the GLA Act 1999, these are not protected characteristics in law and therefore fall outside the formal scope of this EqlA. However, where socio economic factors or other non-protected groups intersect with, or materially affect, protected groups, these impacts are reflected in the analysis to ensure the assessment remains robust, proportionate and aligned with the strategic nature of the London Plan.

The Draft London Plan

A.6 The purpose of the Draft London Plan is to guide development in Greater London. The emerging Draft London Plan contains 52 policies across five chapters as follows:

- Making best use of land and achieving Good Growth
- Delivering the homes and neighbourhoods Londoners need
- Growing London's economy in a way that benefits all
- Creating a greener, healthier, and resilient city
- Place visions and place-based approaches

A.7 Strategic planning is only one of the functions of GLA, so it is not expected that the London Plan alone would address all of the duties of the Equality Act.

A.8 It should also be noted that the Equality Act makes it unlawful to treat someone less favourably in the workplace or vocational training because they are married or in a civil partnership. Employment activities in the workplace are outside the remit of the

London Plan and therefore this protected characteristic will not be affected by any of the London Plan policies.

Consultation on the Draft London Plan

A.9 As well as the content of the Draft London Plan, it is important that the protected characteristics set out in the Equality Act and in GLA Policy are taken into consideration when preparing and consulting on the Draft London Plan, in particular ensuring that all groups of people have the opportunity to access and participate in consultations.

Structure of this report

A.10 This section introduces the purpose of the Equality Impact Assessment and provides an outline of the Draft London Plan. The remainder of this EqIA report is structured as follows:

- Method – summarises the approach to the EqIA
- Baseline information – describes available and relevant information for the nine protected characteristics within Greater London.
- EqIA findings – summarises the overall impact of the Draft London Plan on the protected characteristics and then presents the EqIA effects for each policy in the plan.

Method

A.11 The Draft London Plan has been reviewed to consider the likely impacts of each policy on each of the nine protected characteristics from the Equality Act 2010 listed earlier in this report. For each protected characteristic, consideration has been given to whether the policies in the Draft London Plan are compatible or incompatible with the three main duties set out in the Equality Act 2010.

A.12 A colour coded scoring system has been used to show the effects that the Draft London Plan is likely to have on each characteristic, as shown below in Table A.1.

Table A.1: Colour coded scoring system used to show the likely effects of the Draft London Plan on each characteristic

Symbol and Colour Coding	Likely Effect
+	Positive
0	Neutral
+/-	Mixed (positive and negative)
-	Negative

Baseline Information

A.13 Appendix C of the Integrated Impact Assessment (IIA) Report (June 2026) for the Draft London Plan sets out baseline information about the Greater London Authority area, including some information relevant to the nine protected characteristics covered by the Equality Act. The most relevant information is summarised below under the headings for each of the protected characteristics.

Age

A.14 London’s population was 8.8 million in the 2021 census, an increase of 7.7% since the 2011 census [\[See reference 18\]](#). This growth was not consistent across London, with the greatest population growth in the borough of Tower Hamlets (+ 22.1%) and population declines in Kensington & Chelsea (- 9.6%), Westminster (- 6.9%) and Camden (- 4.6%). This population increase was second-largest nationally over the decade, behind the neighbouring South East region.

A.15 London is a relatively young city, with a median age of 35.9, compared to 41.4 for the rest of England and Wales. Over the past two decades there has been a consistent positive inflow to London of those aged 18-24 and a consistent negative outflow of those aged 25-44 (those most likely to be parents of young children). This is a result of the large numbers of young adults who come to work or study in London and the tendency for Londoners to relocate outside the capital from their mid-30s onwards. The number of children in London is projected to fall back from recent highs, primarily due to a decline in fertility rates since 2012.

A.16 The number of children is decreasing as a share of overall residents. Over the last decade, most inner London boroughs saw large decreases in the number of younger children (aged 0-10). Most outer London boroughs had stable or increased numbers. The degree of change varies between boroughs, from minus 25% in Westminster and Kensington and Chelsea, to plus 23% in Havering.

A.17 A relatively small proportion of London's population is over 65, with 9.4% in Inner London and 13.6% in Outer London compared to 19.8% in the rest of England. However, the population is set to age significantly over the coming decades, with the number of people aged 80 and over projected to more than double.

Disability

A.18 Across London, 13.2% of the population is disabled (using the definition under the Equality Act 2010), with this figure varying slightly between boroughs. This compares to 24% of the total English population [\[See reference 19\]](#). The characteristics of disabled Londoners highlight the intersectionality between Londoners with disabilities and other groups with protected characteristics. The characteristics of disabled Londoners are as follows: 55% are women, 46% are aged 65 or over (compared to 9% of all Londoners), 84% are retired or not working, and 41% have a household income of less than £10,000 [\[See reference 20\]](#).

Gender reassignment

A.19 While there is now some population data relating to the number of people identifying as a gender different from their sex registered at birth (see below), there is no single official dataset for the number of people who seek medical transition or who undergo surgery. There is some NHS data about Gender Identity Clinic (GIC) demand, which shows at the main London clinic (Charing Cross), referrals rose from c. 500/year (2006-07) to c.1,900/year (2015-16) [\[See reference 21\]](#). However, waiting times for patients referred to GICs can be several years [\[See reference 22\]](#) and this can have detrimental effects on mental health for those people.

Gender identity

A.20 The 2021 census was the first to ask a question about gender identity, which enabled the size of the transgender population in the UK to be measured for the first time. It was a voluntary question that was answered by 91% of London's residents. However, after some users raised concerns regarding the estimates of the transgender population, the ONS and the Office for Statistics Regulation undertook a review into the statistics collected on gender identity for the Census. A particular concern that was highlighted was the high proportion of people with low English proficiency selecting that they have a gender identity different from their sex registered at birth, but giving no specific identity. As a result, the status of the England & Wales Census 2021 gender identity statistics has been downgraded to "official statistics in development" which means they are being tested with users.

Despite this, the data from the census is the best that is available for helping to understand the size and distribution of the transgender community in London [\[See reference 23\]](#).

A.21 The 2021 census recorded that 0.9% of Londoners aged 16 or over identified with a gender identity different from their sex registered at birth. This compared to 0.5% for the rest of England and Wales. 7.9% of Londoners aged 16 or over did not answer the question. Of the 0.9% who reported that their gender identity differed from their sex at birth, 0.16% identified as a trans man, 0.16% identified as a trans woman, and 0.08% identified as non-binary [\[See reference 24\]](#).

A.22 The distribution of respondents varies by borough across London with Hackney (0.63%), Haringey (0.61%) and Brent (0.6%) having the largest proportion of the population identifying as transgender and Bromley (0.23%), Richmond upon Thames (0.25%) and Havering (0.26%) having the smallest. There is also variation in the number of people identifying as trans men and trans women across London boroughs. The highest population of trans women is found in Barking and Dagenham (0.25%) and the lowest in Bromley (0.07%). For trans men, Brent (0.28%) has the highest population and City of London (0.06%) the lowest [\[See reference 25\]](#).

Marriage and civil partnerships

A.23 In 2023, there were 27,847 marriages across London. This is 12.4% of all marriages across England and Wales. In the same year there were 1,164 same sex marriages which equates to 0.5% of all same sex marriages across England and Wales [\[See reference 26\]](#).

A.24 There were a lot fewer civil partnerships than marriages across London in 2023; 411 same-sex civil partnerships and 1,436 opposite-sex civil partnerships. However, these equate to 31% and 24% respectively of all civil partnerships across England. There were more of both types of civil partnerships recorded in Inner London boroughs than Outer London boroughs, although the Outer London boroughs figure is still the second highest overall in England. Of the same-sex civil partnerships, two thirds were male couples and one third were female couples. The general trend is for people forming a same-sex civil partnership to be younger (more people under 50 than over) whereas more people over 50 formed an opposite-sex partnership than under 50 [\[See reference 27\]](#).

Pregnancy and maternity

A.25 The number of births in London peaked around 2012 and has since continued to fall despite there being more women of reproductive age. The decline in the fertility rate is greater in Inner London than in the rest of England and Wales, while the decline in Outer London is similar to the national picture. Economic conditions including the cost of housing have been identified as a significant contributory cause for the decline in births and are key push factors for young people and families leaving London.

Race

A.26 London is the most diverse region of the UK in terms of race, religion, nationality and sexuality. White groups made up 54% of London's population in 2021. Of the remaining 46%, Asian groups made up 21%, Black groups 14% and Mixed groups 6% and Other ethnic groups 6%. A high proportion of London's population is made up of individuals and families who moved here from another country. At the time of the most recent census, 41% of Londoners were born outside the UK, compared to the UK average of 16% [\[See reference 28\]](#).

A.27 There are more than 300 languages spoken in London, and nearly half of all Londoners identify as Black, Asian, Mixed or Other (ONS). Most Londoners exhibit high levels of belonging – in the 2021-22 Survey of Londoners [\[See reference 29\]](#), 80% felt they belonged to the city, and 73% felt they belonged to their local area (with local area defined as being 15-20 minutes walking distance from their home). Feelings of belonging varied by ethnicity, religious belief, and age. For example, older Londoners (82%) were far more likely to feel they belonged to their local area than Londoners aged 16-24 (68%). At 64%, Londoners aged 25-34 reported the lowest levels of belonging.

A.28 Around 8 in 10 Londoners (80%) agree that their local area is a place where people from different backgrounds get on together. However, Londoners from some of London's under-served communities had lower than average rates of agreement that people from different background get on well in their area. This included Londoners who said they were not proficient in English (66%), those not working because of sickness or disability (70%), Londoners with no qualifications (71%), and those who were digitally excluded (71%).

Religion or belief

A.29 London has many faiths and beliefs represented within the population. In the 2021 Census, the largest religions were Christianity (40.6%), Islam (14.9%), Hinduism (5.15%), Judaism (1.65%), Sikhism (1.64%), Buddhism (1.0%), and others (0.9%). The number of London residents having no religion is growing. Across London, the percentage of residents who described themselves as having "No religion" increased from 21.0% to 27.1%

Sex

A.30 In 2023, 51% of London's population was female and 49% was male [\[See reference 30\]](#). The differences occur most among children, with 2% more 0-15 year olds being male than female, and older people with 2% more females over 65 than males living in London.

Sexual orientation

A.31 In the 2021 census, 86% of London's population aged 16 or over identify as being heterosexual or straight, while 4.3% identify as gay, lesbian, bisexual or other sexuality (compared to 3.0% for the rest of England and Wales). The remaining 9.5% did not answer. LGBTQ+ (lesbian, gay, bisexual, trans, queer, +) people are as diverse as other Londoners. As such, their experiences may differ depending on other aspects of their identity. LGBTQ+ [\[See reference 31\]](#) Londoners are more socioeconomically polarised than other Londoners, as they are more likely to report both being financially comfortable and in poverty.

Issues currently affecting some people with protected characteristics in London

Deprivation

A.32 Despite being the richest city in the UK, London also has the most people in poverty. Around 1 in 5 Londoners (19%) live in relative poverty (after housing costs); this is roughly 1.7 million people. A third of children in London live in poverty, and one child in 21 is homeless and living in temporary accommodation.

A.33 The poverty rate is highest in London compared with all other regions of the UK and especially high in Inner London. There is a clear pattern that Londoners living in

the most deprived areas have poorer outcomes compared with those living in the least deprived areas across various measures (e.g. neighbourhood relationships, trust and social isolation). Poverty and deprivation are important predictors of loneliness and act as major barriers to social integration. Londoners experience more social isolation than people in other regions of the UK, and loneliness is particularly prevalent among older people.

A.34 Based on the UK Government's qualitative index of multiple deprivation (IMD), many places in London are among the most deprived in the country. The pattern of deprivation is geographically complex, with a patchwork of contrasts between neighbourhoods within boroughs. Areas of deprivation are often in concentrations and follow particularly corridors. While neighbourhoods in Central London tend to be among the least deprived, these are surrounded by areas of deprivation such as Tower Hamlets in the East and the north of the City of Westminster. Suburban areas of Outer London, particularly in the south west, are among the least deprived.

A.35 In London's 10% most deprived neighbourhoods, the proportion of transgender residents (0.46%) is more than 3 times higher than in the 10% least deprived (0.148). The London neighbourhood with the highest proportion of transgender residents is St Raphaels in Brent (1.4%), which is among the 10% most deprived neighbourhoods in London. Conversely Crofton in Bromley is the only London neighbourhood with no transgender residents and among the 10% least deprived neighbourhoods [\[See reference 32\]](#).

A.36 Some Londoners who share protected characteristics are more likely to experience poverty (after housing costs). The Households Below Average Income report shows that [\[See reference 33\]](#):

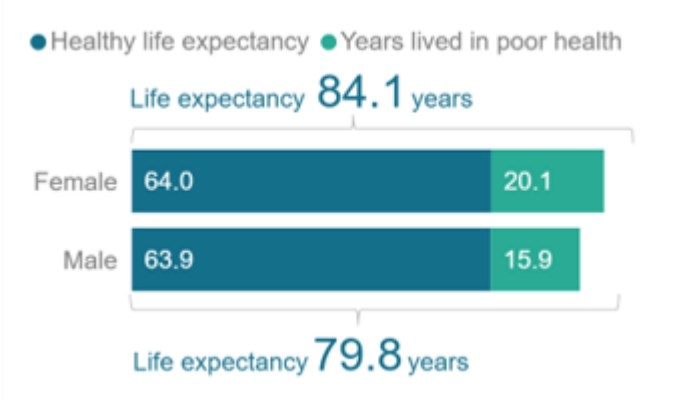
- Young Londoners (aged under 24) are more likely to be in poverty than other Londoners (32% vs 22%).
- Women are more likely to be in poverty than men (28% vs 24%).
- Disabled people are more likely to be in poverty than non-disabled people (30% vs 25%). People living in a household where someone is disabled are also more likely to be in poverty than people living in a household where no one is disabled (31% vs 24%).
- People from Black, Asian and minority ethnic backgrounds are more likely to be in poverty than White Londoners [\[See reference 34\]](#). 18% of White Londoners are in poverty, compared with 38% of Asian Londoners, 36% of Black Londoners, 28% of Mixed ethnicity Londoners, and 43% of Londoners from an Other ethnic group.

Health and life expectancy

A.37 The cost-of-living crisis continues to impact on the health of Londoners [See reference 35]. Along with shifts in the housing market and escalating climate risk, this has exacerbated ethnic and socioeconomic inequalities in London across education, income and poverty, crime and the built environment [See reference 36]. As London responds to the climate emergency, climate risks disproportionately affect the most deprived and disadvantaged individuals who are both more exposed and more vulnerable to their impacts, with reduced capacity to adapt [See reference 37] [See reference 38].

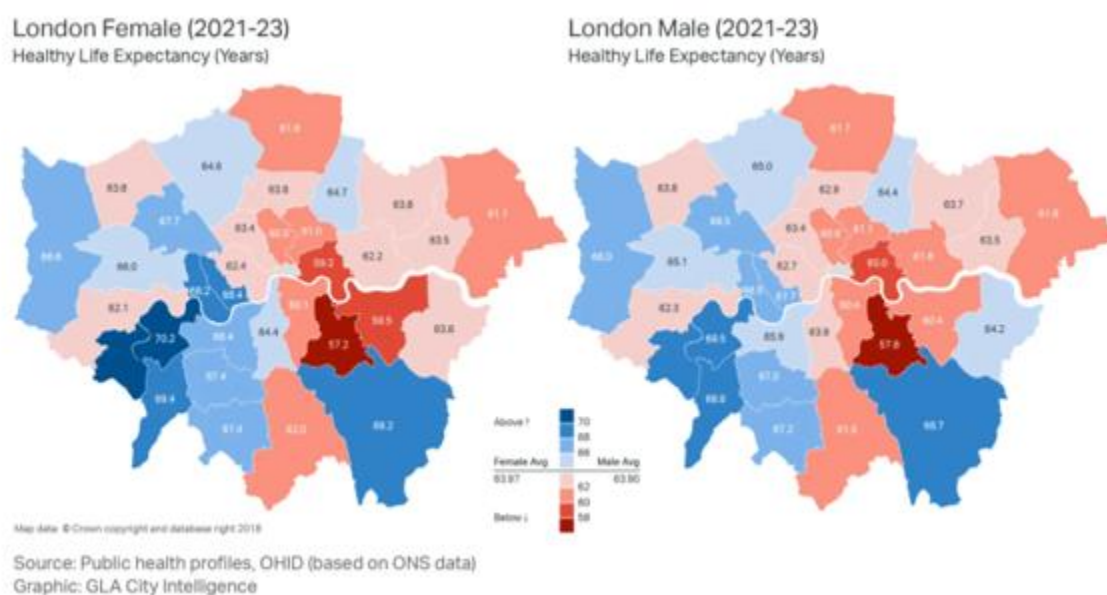
A.38 The leading causes of death [See reference 39] in London (all ages, 2024) were cancer (26%), dementia and Alzheimer’s disease (11%), ischaemic heart diseases (10%), cerebrovascular diseases (5%), and chronic lower respiratory diseases (5%). Disparities in death rates across nearly every cause of death contributed to the life expectancy gap between the most and least deprived deciles in 2021. Apart from COVID-19, circulatory conditions dominate the gap in Life Expectancy between the most and least deprived deciles illustrating an important prevention opportunity – these gaps are largely due to the conditions in which poorer Londoners live and work. Figure 1 shows the life expectancy at birth and the healthy life expectancy for both male and females. Life expectancy for females is approximately 4.3 years higher than for males.

Figure A.1: Life expectancy at birth and healthy life expectancy of Londoners, 2021-23 [See reference 40] [See reference 41]



A.39 Figure 2 shows the variation of life expectancy across the London boroughs. There is more than 10-years variation in healthy life expectancy between London boroughs. Lower life expectancy broadly correlates with higher deprivation.

Figure A.2: Healthy Life Expectancy across London's boroughs (2021-23) [See reference 42] [See reference 43]



A.40 Prevalence of mental health conditions [See reference 44] in London include depression 9.5% (2022-23) and severe mental illness 1.1% (2023-24). In terms of wellbeing, 24% of Londoners reported high anxiety and 5% had low happiness score. Using modelled general practice data, prevalence of several commonly diagnosed health conditions was higher in deprived groups.

A.41 The causes of death and long-term conditions prevalent in London listed above are driven by risk factors such as obesity, physical inactivity and air pollution, which in turn are influenced by the built environment.

Housing affordability and availability

A.42 The differences in the amount of income spent on housing costs for Londoners with shared protected characteristics is partly a reflection of different distribution across housing tenures, and partly a reflection of their different incomes. The English Housing Survey data sets out that in London [See reference 45]:

- Women spend a higher median proportion of their income on housing costs than men (28% vs 25% respectively).
- Disabled people spend a higher median proportion of their income on housing costs than non-disabled people (29% vs 27% respectively).
- Londoners from Black, Asian and minority ethnic backgrounds spend a higher median proportion of their income on housing costs than White Londoners (32%

for Mixed ethnicity Londoners, 30% for Londoners from an Other ethnic background, 29% for Black Londoners, 27% for Asian Londoners, 26% for White Londoners).

- Older Londoners spend a higher median proportion of their income on housing costs than younger Londoners (31% for Londoners aged 65+ vs 25% for 25-34 year olds).

A.43 73,310 households were in temporary accommodation in March 2025, the highest on record, including nearly 95,000 children.

A.44 An ONS survey found that 53% of disabled Londoners find it difficult to afford their housing costs, compared with 44% of non-disabled Londoners [\[See reference 46\]](#). Most Deaf and disabled Londoners who responded to a survey by Inclusion London said they struggle to afford housing costs, with a third saying that they had to cut back on food or other essentials to afford housing costs [\[See reference 47\]](#).

A.45 Based on GLA analysis of English Housing Survey data from 2018-2022, 17% of homes in London have all four basic accessibility features necessary to make them 'visitable' by someone with mobility difficulties. However, less than 1% are 'visitable' while also having the accessible bathrooms, kitchens and lift access that a disabled household might need. 11% of households in London with disabled members say they do not feel safe at home because they fear a fire might break out, compared to around 8% of households with no disabled members. One in four deaf and disabled Londoners who responded to an Inclusion London survey said that their home is completely inaccessible, meaning that they cannot safely and easily use basic facilities like kitchens, bathrooms and entryways [\[See reference 48\]](#).

A.46 There is an urgent and unmet need across London for sites and pitches for London's Gypsy and Traveller communities. In 2024/25, 3.7% of Londoners seen rough sleeping identified as White-Gypsy/Irish Traveller, White-Roma, or Gypsy/Romany/Irish Traveller. In contrast, Census 2021 data estimates that approximately 0.5% of Londoners identified as Gypsy or Irish Traveller, or Roma.

A.47 The GLA Mental Health Specialist and Supported Housing (MH SSH) Research Report has identified a large gap in terms of people who require MH SSH and the number of identified units across London. Conservative estimates show 7,500 placements over 5,199 units, as a result of placements made outside of London and in services that do not specialise in mental health. Due to increasing mental health needs, lack of affordable housing and rising levels of homelessness, challenges in accessing community healthcare, and vulnerability as a result of increased levels of co-occurring conditions, the report estimates an 11% increase in need in the next 10 years.

A.48 The GLA's Housing Research Note 8 Housing and race equality in London: An analysis of secondary data (2022) identifies that on average, Black Londoners and those from most other minority ethnic groups experience worse housing conditions, less tenure security, higher rates of housing need, worse affordability and lower wealth than White Londoners. While some of these inequalities can be traced back to differences in income and secure employment between Londoners from different ethnic background, these existing differences are exacerbated by London's high housing costs which disproportionately affects those on low incomes [\[See reference 49\]](#).

A.49 LGBTQ+ people are more than twice as likely to experience hidden homelessness (e.g. couch surfing, squatting) as non-LGBTQ+ people, and young people are also more likely than other age groups to experience hidden homelessness [\[See reference 50\]](#)

Physical activity

A.50 In London, only 67% of adults and 47% of children and young people are physically active (2023-24) i.e. meet the UK Chief Medical Officers' recommended levels of physical activity [\[See reference 51\]](#). Physical inactivity was higher among those in routine/semi-routine jobs and long-term unemployment, people with a disability, and some ethnic groups [\[See reference 52\]](#). Spatial development that enables active travel (through walking, cycling or using public transport) [\[See reference 53\]](#) can support Londoners to meet the physical activity guidelines [\[See reference 54\]](#). Over a quarter of Londoners (27.6%) now live within 400m of the cycle network [\[See reference 55\]](#).

Unemployment and pay gaps

A.51 Some Londoners who share protected characteristics are more likely to be unemployed, reflecting structural barriers in the labour market. The ONS Annual Population Survey 2024 [\[See reference 56\]](#) sets out that:

- Young Londoners are much more likely to be unemployed: 31% of 16–19-year-olds, 16% of 16–24-year-olds, and 13% of 20–24-year-olds are unemployed.
- Disabled Londoners are twice as likely to be unemployed as non-disabled Londoners (8% vs 4%).
- Londoners from some Black, Asian and minority ethnic backgrounds are more likely to be unemployed. 9% of Pakistani and Bangladeshi Londoners are

unemployed, along with 7% of Black Londoners, 10% of Mixed ethnicity Londoners and 9% of Londoners from an Other ethnic background.

- Londoners from Muslim, Hindu or any Other religious background are more likely to be unemployed (9%, 6% and 7% respectively) than among all Londoners.

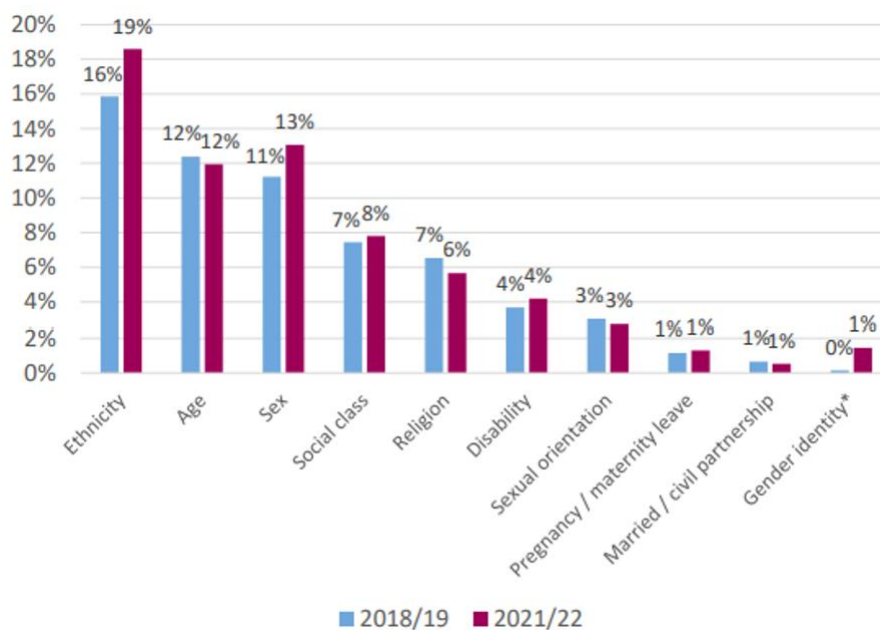
A.52 Pay gaps exist because one group is paid, on average, less than another group. As with the UK, gender, ethnicity, and disability pay gaps are experienced in London, as summarised below. The gender and ethnicity pay gaps have been narrowing over time in both geographical areas [\[See reference 57\]](#).

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

Unfair treatment

A.53 Many Londoners experience unfair treatment because of one or several protected characteristics, or because of their social class – 37% in the 2021/22 Survey of Londoners. Ethnicity was the more common characteristic, followed by sex. Other than for ethnicity, for each characteristic, there has been no significant change since 2018-19.

Figure A.3: Percentage of Londoners aged 16 and over treated unfairly because of protected characteristics or social class, 2018/19 and 2021/22 (Source: Survey of Londoners)



Crime, safety and security

A.54 Gender based violence and harassment is common in public spaces and varies from daily microaggressions such as staring and catcalling, to groping, flashing, stalking and more extreme forms of violence such as rape and abduction. Some 71% of women in the UK have experienced some form of sexual harassment in a public space, with this number rising sharply to 86% among women aged 18-24 [\[See reference 58\]](#).

A.55 MOPAC's Public Attitude Survey is used to gain an understanding of Londoners' perceptions and experience of policing and crime within London. Just under half of Londoners are worried about crime and anti-social behaviour in their local area, and around one in five Londoners feel hate crime is a problem in their area. Females are significantly less likely to feel safe after dark than males; in Q1 25/26, 58% of females felt safe after dark compared with 77% of males.

A.56 Some groups of Londoners are more likely to be concerned about crime and safety in their area. In Q1 2025/26 LGBT+ Londoners, mixed ethnicity Londoners, and Jewish Londoners were most likely to feel hate crime is a problem in their area. Disabled Londoners, females, and Sikh Londoners were least likely to feel safe walking alone after dark. Fear of crime can be a barrier to walking or using public

transport, and more generally can be stressful and limit people's access to activities and contribute to social isolation.

EqlA findings

A.57 The detailed findings of the equality impact assessment for the policies in the Draft London Plan are presented in Tables 1 to 5 with justification for the effects identified also provided. An overall summary of the EqlA findings for the Draft London Plan is provided at the end of the report.

Potential equality impacts of the Draft London Plan policies in relation to the 'protected characteristics'

Making best use of land and achieving Good Growth

A.58 Table 1 summarises the potential EqlA effects of the policies in the 'Making best use of land and achieving Good Growth' chapter of the Draft London Plan, and an explanation for effects identified in relation to each policy is provided below.

A.59 Policy MBUL1: Spatial strategy requires new housing and employment development to be located and designed to promote greater connectivity and inclusivity, and notes that intensification of land use across London should be achieved in a way that contributes to meeting London's different needs. It also prioritises provision of affordable housing provision and public transport improvements in developer contributions. These should all help to reduce existing inequalities, and therefore the policy is expected to have a minor positive effect in relation to all of the protected characteristic groups (except marriage/civil partnership).

A.60 Policy MBUL2: Optimising the use of land and site capacity will not directly affect any of the protected characteristics although there may be indirect effects. The policy's support for different development typologies and its focus on design codes and masterplanning has the potential to offer greater choice and flexibility in housing options for disabled access and older people. However, increased density can also exacerbate risks such as urban heat island effects and surface water flooding which may adversely impact young and older people, pregnant people and people with limited mobility, disabilities and health issues. Therefore, mixed positive and negative indirect effects are identified for these protected characteristics.

A.61 Policy MBUL3: Tall buildings and Policy MBUL4: Utilities – capacity, connectivity, and resilience are not expected to affect any of the protected characteristics.

Table A.2: Likely EqIA effects of the 'Making best use of land and achieving Good Growth' policies

Policy	Age	Disability	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity	Race	Religion or Belief	Sex	Sexual Orientation
Policy MBUL1: Spatial Strategy	+	+	+	0	+	+	+	+	+
Policy MBUL2: Optimising the use of land and site capacity	+/-	+/-	0	0	-	0	0	0	0
Policy MBUL3: Tall buildings	0	0	0	0	0	0	0	0	0
Policy MBUL4: Utilities capacity, connectivity, and resilience	0	0	0	0	0	0	0	0	0
Policy MBUL5: Sustainable Transport to enable London's Growth	+	+	+	0	+	+	+	+	+
Policy MBUL6: High quality design for a growing, changing city	+	+	+	0	+	+	+	+	+
Policy MBUL7: London's Heritage	0	0	0	0	0	+	+	0	0
Policy MBUL8: Inclusive Design	+	+	+	0	+	+	+	+	+
Policy MBUL9: Healthy Streets and Public Realm	+	+	+	0	+	+	+	+	+
Policy MBUL10: Security and safety	+	+	+	0	+	0	0	+	0

A.62 Policy MBUL5: Sustainable transport to enable London's growth seeks to facilitate a greater proportion of travel being made by walking, cycling and public transport. Measures set out in the policy will help to ensure equitable access to jobs, services and facilities for people who are reliant on public transport. The policy also supports improvements to the safety and convenience of the public transport network, which will encourage and enable more people to access it, including those who may face disadvantage. In these respects, Policy MBUL5 will benefit all of the protected characteristic groups (except marriage/civil partnership). Another objective of the policy is to reduce carbon emissions generated by London's transport network. It does this through various requirements to support a shift away from cars, which will likely also lead to less air and noise pollution. This aspect of the policy will have pronounced benefits for certain vulnerable groups – particularly children, older people, Black, Asian and minority ethnic communities, people who are pregnant and people with disabilities.

A.63 Policy MBUL6: High quality design for a growing, changing city requires that referable scale development proposals have undergone at least one independent design review before an application is submitted. The potential need for inclusive design review and other specialist design review and advice as part of this is specifically highlighted. This should help to ensure that designs have been informed by diverse views. The policy also requires development proposals to design in measures to reduce exposure to air pollution. This will have positive impacts on health, particularly for younger people, older people and people with disabilities who are more vulnerable to the adverse effects of air pollution. Further to this, maximising active frontages will provide passive surveillance which could improve safety and feelings of safety for all protected characteristic groups (except marriage/civil partnership).

A.64 Policy MBUL7: London's Heritage encourages the development of local heritage strategies that capture the benefits of local heritage and its contribution to a diverse cultural offer. Involving local communities in the recognition and enhancement of local heritage may help support greater participation in public life and may help to protect the character of places linked to the identity and needs of particular groups. The preservation of historical assets will also improve wider access to London's historic and cultural offerings, which can act as important centres for social interaction, community events and cultural education. This can help to improve the wider understanding and appreciation of heritage assets across London and could also help to foster inclusion and support good relations between different communities. Therefore, Policy MBUL7 is expected to have a positive effect for the protected characteristics of race and religion or belief.

A.65 Policy MBUL8: Inclusive Design ensures that development contributes towards an inclusive built environment providing people-focused places and spaces that encourage social interaction. Fear of crime can be a barrier to active travel and more generally can be stressful and limit people's access to activities, as some groups are at higher risk including women, disabled people, LGBTQ+, Black, Asian and minority ethnic communities, and some faith communities. The policy's focus on design that accommodates the requirements of London's diverse population should result in spaces that enhance safety and feelings of security and that all people feel comfortable being in. The requirements to include specific information in Design and Access Statements should help to ensure designs have been informed by diverse views and have considered the full range of barriers to inclusion (physical, cultural, psychological). The requirements around level access will help to remove the physical barriers to inclusion and participation, securing greater equality of opportunity by better meeting specific needs. This is particularly important for those with a disability or existing health condition, older people, and those who are pregnant or have recently given birth or have very young children. Therefore, all the protected characteristics except marriage/civil partnership are likely to benefit from this policy.

A.66 Policy MBUL9: Healthy Streets and Public Realm aims to address health inequalities, and improve air quality by encouraging walking, wheeling, cycling and uptake of public transport, with benefits to those more vulnerable to air pollution such as children and older people, people with disabilities and pregnant women. Additionally, the focus on safety and feelings of safety both during the day and night aligns with the Mayor's ending Violence against Women and Girls (eVAWG) Strategy. Overall, the policy creates an opportunity for public space to be designed in such a way that it can be used by people of different ethnic and religious backgrounds, age groups, income levels, genders and abilities, including pregnant women and disabled people. This is because the policy focuses on safety, inclusive design, provision of step-free access, a variety of free to use seating, public toilets, provision of school streets, and engagement with local communities. This can promote greater equality of opportunity by meeting diverse needs to achieve a more inclusive, integrated, and fair city. Therefore, the policy is expected to have a positive effect in relation all of the protected characteristic groups (except marriage/civil partnership).

A.67 Policy MBUL10: Security and safety requires Local Planning Authorities to work with a range of stakeholders to identify community safety needs, including requiring residential buildings of any height to meet the highest standard of fire safety. These requirements will enhance safety and feelings of security while ensuring that risk factors are appropriately addressed and will have positive effects on protected characteristics of age, disability and pregnancy. The policy requirement that

development should consider and incorporate design measures to address safety and security specifies that these should include measures for women and girls and other vulnerable groups. This requirement will help promote equitable access to safe, inclusive and accessible open spaces, in particular for women, girls and other vulnerable groups. As a result, the policy will also have a positive effect for the protected characteristics of sex (female), age (children) and gender reassignment.

Delivering the homes and neighbourhoods Londoners need

A.68 Table 2 summarises the likely EqIA effects of the policies in the ‘Delivering the homes and neighbourhoods Londoners need’ chapter of the Draft London Plan, and an explanation for effects identified in relation to each policy is provided below.

A.69 Lack of access to secure and affordable housing can have detrimental impacts on well-being and health of the whole population including those with protected characteristics. Policy HN1: Increasing London’s housing stock requires Local Plans to adopt and plan for the identified ten-year housing targets. This will help to ensure that additional housing to meet the accommodation needs of different people is positively planned for and delivered at the local level and could help people with protected characteristics have access to housing. Overall, the policy is expected to have a minor positive effect for all protected groups (except marriage and civil partnership).

A.70 By protecting existing floorspace and requiring an uplift if it is demolished, Policy HN2: Protecting and reshaping housing will help to ensure new homes will be affordable to those in need, which will help to reduce health inequalities in London’s population. Affordable housing, especially when delivered as part of estate regeneration programmes, may also help to enhance connectivity between communities by ensuring a mix of socio-economic backgrounds live together, which may help to foster inclusion and promote equality of opportunity and could have a positive effect for the protected characteristics of race and religion or belief. Overall, Policy HN2 is expected to have a positive effect on all protected characteristics (except marriage and civil partnership).

A.71 Policy HN3: Delivering affordable housing seeks to deliver affordable housing to contribute to meeting London’s need as set out in London’s Strategic Housing Market Assessment (SHMA), although it is acknowledged that it would not fully meet affordable housing needs. Ensuring that a proportion of new homes in any new development will be affordable will help to reduce health inequalities (especially in the long-term) amongst a certain proportion of London’s population, including older people and disabled people. The delivery of a range of affordable homes can help to foster inclusion between communities and can also ensure everyone has access to

housing. Thus, this policy provides a range of benefits to all protected groups (except marriage and civil partnership).

A.72 Policy HN4: Gypsy and Traveller accommodation requires the accommodation needs of Gypsies, Travellers and Travelling Showpeople to be met. Meeting the accommodation needs of Gypsies, Travellers and Travelling Showpeople will ensure this group of people have access to suitable accommodation, and therefore has a positive impact on the protected characteristic of race. The policy could also have beneficial effects in terms of social cohesion, particularly if provided as part of large-scale residential and mixed-use allocations, as unauthorised sites can be a source of tension. In addition, the policy requires pitch and site layouts, and the design of service blocks, to be accessible and adaptable to ensure they are suitable for all, including those with protected characteristics such as disabled and older people. These groups are therefore positively impacted by Policy HN4.

Table A.3: Likely EqIA effects of the 'Delivering the homes and neighbourhoods Londoners need' policies

Policy	Age	Disability	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity	Race	Religion or Belief	Sex	Sexual Orientation
Policy HN1: Increasing London's housing stock	+	+	+	0	+	+	+	+	+
Policy HN2: Protecting and reshaping housing	+	+	+	0	+	+	+	+	+
Policy HN3: Delivering affordable housing	+	+	+	0	+	+	+	+	+
Policy HN4: Gypsy and Traveller Accommodation	+	+	0	0	0	+	0	0	0
Policy HN5: Managing specialist accommodation	+	+	+	0	+	+	+	+	+
Policy HN6: Build to rent	+	+	+	0	+	+	+	+	+
Policy HN7: Housing size mix	+	+	+	0	+	+	+	+	+
Policy HN8: Housing design	+	+	+	0	+	+	+	+	+
Policy HN9: Accessible housing	+	+	0	0	+	0	0	0	0
Policy HN10: Burial space	+	+	0	0	0	0	+	0	0

A.73 Policy HN5: Managing specialist accommodation will ensure the delivery of supported, specialist, students' and older persons' housing. Meeting these accommodation needs will contribute towards equality by helping to meet the accommodation needs for those whose needs are not met by general needs housing. The policy recognises that supported, specialist, and Older Persons Accommodation comprises many different types and formats of housing that can meet a wide range of needs and requires that development proposals for these types of accommodation to be designed to satisfy the requirements of the intended residents. The policy also requires the design of large-scale purpose-built shared living to provide facilities and services that emphasise communal living and aim to remove barriers to social interaction and encourage engagement. The policy requires both Purpose Built Student Accommodation or Large Scale Purpose Built Living to be carefully located, designed and managed to optimise their impact on neighbourhood mix. This could have beneficial effects in terms of social participation and community cohesion. Though older people are the primary protected group to benefit from this policy, there are potential positive effects for students or older people that also have one or more of the other protected characteristics (except marriage and civil partnership).

A.74 Policy HN6: Build to Rent supports the development of Build to Rent (BtR), with a requirement for affordable housing. Similarly, Policy HN7: Housing size mix supports a range of affordable housing options, taking into account London-wide and local evidence need. As with Policy HN3, ensuring that a proportion of new homes in any new development will be affordable to those in need will help to reduce health inequalities, while also enhancing connectivity between communities by ensuring a mix of socio-economic backgrounds live together. Therefore, a positive effect on equality of opportunity is reflected across all protected characteristic groups (except marriage and civil partnership) for both policies.

A.75 Policy HN8: Housing design requires all new residential development to meet the Nationally Described Space Standard. This Standard would ensure people are not confined to small, uncomfortable dwellings that could have adverse effects on their wellbeing. This will provide a distinct benefit to older people and people with limited mobility, by improving the quality and accessibility of their living space. The policy requires residential development, including outdoor amenity space, to be tenure-blind, which will help prevent segregation between different groups of people – including those with protected characteristics. In addition, provision is made for accessible playspace for children, ensuring those of a young age have good access to a stimulating environment and opportunities for exercise and recreation. The fact all individual dwellings will meet the National Described Space Standard will also contribute to promoting greater equality. Therefore, Policy HN8 leads to several positive effects across all protected characteristic groups (except marriage and civil partnership).

A.76 Policy HN9: supports the development of adaptable and accessible homes, which will improve the quality of life of some of the protected characteristic groups. Older people are more likely to be disabled or have age-acquired impairments or mobility impairments and are therefore more likely to require the design features provided by accessible housing. Many of the design standards and features contained within the accessible housing standards are of benefit to those with very young children. The requirement for student accommodation to be wheelchair accessible is positive for younger people. Improvements to acoustic standards for new residential development will positively impact disabled people, including some types of neurodiversity and mental health conditions. As a result, Policy HN9 provides strong positive effects for disabled people, older people, young people and people who are pregnant and/or care for young children.

A.77 Policy HN10: Burial space requires Local Planning Authorities to plan proactively and collaboratively for the expansion, re-use and long-term provision of burial space, recognising cultural and faith needs. Concentrating provision within established sites may reduce travel distances for mourners and funeral services, helping to limit traffic, emissions, noise and associated air quality impacts. This could provide health benefits to vulnerable groups, including young people, older people and people with disabilities. In addition, the policy provides in principle support for development proposals that will increase provision, including for provision within one borough to meet the needs of faith groups from neighbouring boroughs experiencing burial space shortages. Overall, this policy has direct positive effects on the basis of religion and faith, and indirect benefits for age and disability characteristics.

A.78 No negative effects on any of the protected characteristics have been identified for any of the policies in the 'Delivering the homes and neighbourhoods Londoners need' section of the Draft London Plan.

Growing London's economy in a way that benefits all

A.79 Table 3 summarises the likely EqIA effects of the policies in the 'Growing London's economy in a way that benefits all' chapter of the Draft London Plan, and an explanation for effects identified in relation to each policy is provided below.

A.80 Policy GLE1: Sufficient and appropriate employment space seeks to deliver a growing, diverse and inclusive economy by delivering sufficient and appropriate types of employment space to meet needs. There is evidence that developments can sometimes result in the displacement of existing small and independent business uses including some that are owned or run by Black, Asian and minority ethnic Londoners and/or by third sector, not-for-profit and social enterprises [\[See reference 59\]](#). Policy GLE1 stipulates that developments that result in the potential

displacement of existing small and independent business uses should either re-provide such space in the development where feasible and appropriate, and/or work with the borough to ensure that appropriate relocation options are available. Policy GLE1 includes a clause that planning conditions restricting changes in economic or social infrastructure uses may be used in circumstances where they are justified and necessary to safeguard capacity for the intended uses including social infrastructure. Ensuring that there is a sufficient supply of social infrastructure of different types can be important for many people who share protected characteristics for them to be able to access different services and activities. This includes protected characteristics related to age (younger and older people), disability, gender reassignment, people with different gender identities, sex, pregnancy and maternity, parents and carers, race, religion or belief, and sexual orientation. Therefore, Policy GLE1 is deemed to have positive impacts across most of the protected characteristic groups (except marriage/civil partnership).

Table A.4: Likely EqIA effects of the 'Growing London's economy in a way that benefits all' policies

Policy	Age	Disability	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity	Race	Religion or Belief	Sex	Sexual Orientation
Policy GLE1: Sufficient and appropriate employment space	+	+	+	0	+	+	+	+	+
Policy GLE2: Supply of industrial land	0	0	0	0	0	0	0	0	0
Policy GLE3: Data centres	-?	-?	0	0	-?	-?	0	0	0
Policy GLE4: Night-time economy	+	+	+	0	0	+	+	+	+
Policy GLE5: Culture and creative industries	+	+	+	0	+	+	+	+	+
Policy GLE6: Visitor infrastructure	+	+	+	0	+	+	0	+	+
Policy GLE7: Affordable workspace	+	+	+	0	+	+	+	+	+
Policy GLE8: Access to employment and skills	+	+	+	0	+	+	+	+	+
Policy GLE9: Aviation	+	+	+	0	+	+	+	+	+
Policy GLE10: Safeguarded Wharves	0	0	0	0	0	0	0	0	0
Policy GLE11: Circular economy	0	0	0	0	0	0	0	0	0
Policy GLE12: Waste	0	0	0	0	0	0	0	0	0
Poli GLE13: Aggregates and mineral resources	0	0	0	0	0	0	0	0	0

A.81 Policy GLE2: Supply of industrial land is not expected to directly affect any of the protected characteristics.

A.82 Policy GLE3: Data centres provides strategic criteria for meeting the need for data centres in suitable locations in London. Children, women who are pregnant, older people and those with existing health conditions are particularly vulnerable to the effects of air pollution, in addition to Black, Asian and minority ethnic communities who are more likely to live in areas with poorer air quality. While the policy seeks to mitigate the effects of data centres, the scale of development required is still likely to have some adverse effects in terms of air pollution. Therefore, a negative effect with some uncertainty is expected in relation to this policy for the protected characteristics of age, disability, pregnancy and race.

A.83 Policy GLE4: Night-time economy aims to protect and promote London's 24-hour economy and public houses. It requires major developments to provide safe and inclusive spaces designed for all and supports the introduction and retention of facilities for night workers as well as users, with particular consideration given to gender, age, race and disability. This ensures that areas of night-time activity foster participation in public life at night and inclusion and integration of different communities, including those with protected characteristics. Pubs also play an important role in bringing people together and meeting the needs of particular communities. By protecting pubs that provide a social, heritage, cultural or economic value, Policy GLE4 is likely to benefit certain groups who may value these spaces as safe and welcoming spaces that they can access without fear of discrimination or harassment and therefore have a positive effect on the protected characteristics of sex, sexual orientation, gender reassignment, age, race and disability.

A.84 Policy GLE5: Culture and creative industries states that major development containing cultural consumption uses should be supported in places with good public transport connectivity. This supports a reduced reliance on private car use and should help to reduce impacts of air and noise pollution on local people. This is particularly helpful to those who may be vulnerable to air pollution, such as young people, older people, people who are pregnant, people with disabilities and Black, Asian and minority ethnic communities who are more likely to live in areas with poorer air quality. As well as helping to promote social integration by bringing different communities together, culture also has a particular role to play in helping to tackle social isolation. Ensuring that valued cultural uses are protected and new uses promoted can be important for many people who share protected characteristics. Therefore, Policy GLE5 is expected to have a broad range of positive impacts across most of the protected characteristic groups (except marriage/civil partnership).

A.85 Policy GLE6: Visitor infrastructure promotes the sustainability of London's visitor economy during the day and night. The policy also promotes new and existing visitor attractions, visitor accommodation and other supporting infrastructure in locations that are well-connected by sustainable modes, reducing the risk of increasing pollution through private car use. This has the potential to benefit vulnerable groups including young people, older people, people who are pregnant, people with disabilities and Black, Asian and minority ethnic communities who are more likely to live in areas with poorer air quality. Policy GLE6 also ensures sufficient choice for people who require an accessible bedroom and requires provision of either 10 per cent of new bedrooms to be wheelchair-accessible or 15 per cent of new bedrooms to be accessible rooms. These requirements recognise the need not only for standard wheelchair accessible rooms, but also rooms suitable for people with ambulant mobility impairments or older people who could benefit from additional access features, as well as rooms suitable for people who require assistance or need to be near to a carer. Furthermore, the policy stipulates that development plans should promote the inclusive access of London's visitor economy during the day and night including the provision of public toilets and accessibility by walking, wheeling and cycling. This will help address the needs of people who share protected characteristics including age (especially older people), disability, sex (women), pregnancy and maternity, parents and carers. As a result, Policy GLE6 benefits most of the protected characteristic groups in a variety of ways (except marriage/civil partnerships and religion or belief).

A.86 Policy GLE7: Affordable workspace supports the delivery of affordable workspace for a range of social, cultural or economic purposes. This includes for disadvantaged or under-represented groups and sectors with cultural, educational and social value. This will help to ensure inclusive access to economic opportunities, including for people with protected characteristics. The policy also supports educational outcomes through connections to schools, colleges or higher education which will have positive equalities impacts related to the protected characteristics group: age (younger people). As such, Policy GLE7 is deemed to benefit most of the protected characteristic groups (except marriage/civil partnership), with particularly positive impacts for young people.

A.87 Policy GLE8: Access to employment and skills seeks to secure training, apprenticeship and employment opportunities for Londoners currently out of work or under-employed, and to increase underrepresented groups within the construction industry and other relevant sectors. This will likely help minimise disadvantages, including for groups with protected characteristics such as women, disabled people, Black, Asian and minority ethnic groups, younger, older and LGBTQ+ Londoners, Gypsies and Travellers, carers and migrants, and support greater participation in

London's workforce. The policy therefore benefits most of the protected characteristic groups (except marriage/civil partnership).

A.88 Policy GLE9 requires that benefits related to aviation proposals, including from regulatory and technological improvements that could allow for more flights without additional environmental footprint, are fairly shared with local and affected communities. For advance air mobility (AAM) proposals, the policy sets out principles that focus on equity, accessibility, economic and social value against which proposals should be assessed. These measures will likely help to reduce disadvantages across most of the protected characteristics (except marriage/civil partnership). The policy discourages an increase in aviation activity to ensure that net zero targets are achieved and any environmental impacts relating to additional greenhouse gas emissions are effectively addressed. The requirement in the policy to contribute toward sustainable surface access will help to ensure that any additional trips are through public transport, walking and wheeling, further reducing transport-related carbon emissions, air pollution and noise pollution. This component of Policy GLE9 may be particularly beneficial to vulnerable groups, including very young people, older people, people who are pregnant, people with disabilities and Black, Asian and minority ethnic communities who are more likely to live in areas with poorer air quality.

A.89 Policy GLE10: Safeguarded wharves, Policy GLE11: Circular economy and Policy GLE12: Waste are not expected to directly affect any of the protected characteristics. Although each of these policies may help to contribute to reducing air pollutants associated with road transport and carbon emissions through the reuse of existing materials, these effects are likely to be fairly dispersed across Greater London and therefore unlikely to benefit specific protected characteristic groups.

Creating a greener, healthier, and resilient city

A.90 Table 4 summarises the likely EqIA effects of the policies in the 'Creating a greener, healthier, and resilient city' chapter of the Draft London Plan, and an explanation for effects identified in relation to each policy is provided below.

A.91 All policies under the heading of 'Creating a greener, healthier, and resilient city' contribute to reduced carbon emissions, which helps to reduce and mitigate the adverse effects of climate change. These impacts include increased heat risk and susceptibility to flooding, and can have a disproportionately negative impact on vulnerable groups including young and older people, Black, Asian and minority ethnic people, people who are pregnant and people with disabilities. Therefore, the policies in this chapter of the Draft London Plan are considered to have positive impacts in relation to the protected characteristics age, disability, pregnancy and race.

A.92 The energy use intensity and space heating requirements set out in Policy GHR1: Energy efficiency, plus the requirement for developments to seek the lowest cost, lowest carbon heating solution outlined in Policy GHR2: Low cost low carbon heat, should result in warmer homes and/or reduced heating costs for occupiers. This effect may be particularly positive for those more vulnerable to the impact of cold homes such as disabled and elderly people as well as those experiencing fuel poverty (the groups most likely to be fuel poor are families with children, disabled people and people from Black, Asian and minority ethnic people). Therefore, these two policies also have positive effects on the protected characteristics age, disability, pregnancy and race.

Table A.5: Likely EqIA effects of the 'Creating a greener, healthier, and resilient city' policies

Policy	Age	Disability	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity	Race	Religion or Belief	Sex	Sexual Orientation
Policy GHR1: Energy efficiency	+	+	0	0	+	+	0	0	0
Policy GHR2: Low cost low carbon heat	+	+	0	0	+	+	0	0	0
Policy GHR3: Whole life carbon	+	+	0	0	+	+	0	0	0
Policy GHR4: Heat risk	+	+	0	0	+	+	0	0	0
Policy GHR5: Flood risk and drainage	+	+	0	0	+	+	0	0	0
Policy GHR6: Trees, biodiversity and geodiversity	+	+	0	0	+	+	0	0	0
Policy GHR7: Green Infrastructure and Urban Greening Factor	+	+	0	0	+	+	0	0	0
Policy GHR8: Publicly accessible green space	+	+	0	0	+	+	0	0	0
Policy GHR9: Clean and healthy waterways	+	+	0	0	+	+	0	0	0
Policy GHR10: Air quality	+	+	0	0	+	+	0	0	0
Policy GHR11: Cycle and Car Parking	+	+	0	0	+	+	0	0	0

A.93 Policies GRH5 to GHR11 contribute to a reduction in air pollution through various means, which has direct positive impacts for all Londoners, but in particular groups who are disproportionately affected by poor air quality. As with the adverse impacts of climate change, the most vulnerable groups include young and older people, Black, Asian and minority ethnic people, people who are pregnant and people with disabilities. As such, Policies GHR5 to GHR11 provide positive impacts in relation to the protected characteristics age, disability, pregnancy and race.

A.94 Policies GHR6 to GHR9 contribute to improved access to nature and waterways, which is likely to help ameliorate existing inequalities in access to natural spaces, particularly for those in flats who may not have access to a garden. This supports equality of opportunity for the protected characteristics age, disability, pregnancy and race.

A.95 Policy GHR11: Cycle and car parking requires provision of parking for larger cycles and disabled persons' car parking. The provision will meet the travel needs of people that may need a larger cycle (potentially affecting children and disabled people) and that need disabled persons' car parking. Therefore, the policy is expected to have a positive effect in relation to the protected characteristics age and disability.

Place visions and place-based approaches

A.96 Table 5 summarises the likely EqIA effects of the policies in the 'Place visions and place-based approaches' chapter of the Draft London Plan, and an explanation for effects identified in relation to each policy is provided below.

Table A.6: Likely EqIA effects of the 'Place visions and place-based approaches' policies

Policy	Age	Disability	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity	Race	Religion or Belief	Sex	Sexual Orientation
Policy PV1: Brownfield first Opportunity Areas (BFOAs)	+	+	+	0	+	+	+	+	+
Policy PV2: Central Activities Zone (CAZ)	+/-	+/-	+/-	0	+/-	+/-	+/-	+/-	+/-
Policy PV3: Town centres and high streets	+/-	+/-	+/-	0	+/-	+/-	+/-	+/-	+/-
Policy PV4: Strategic economic clusters and corridors	+?	+?	+?	0	+?	+?	+?	+?	+?
Policy PV5: Suitable uses on industrial land	0	0	0	0	0	0	0	0	0
Policy PV6: Metropolitan Open Land (MOL)	+	+	+	0	+	+	+	+	+
Policy PV7: Sustainable development and enhancement of the green belt	+/-	+/-	+	0	+/-	+/-	+	+	+
Policy PV8: Strategic and local views including the London View Management Framework	0	0	0	0	0	0	0	0	0

A.97 Policy PV1: Brownfield First Opportunity Areas (BFOAs) prioritises active travel and public transport, which will reduce air pollution and CO2 emissions, improve road safety and reduce the use of private cars. The policy encourages consideration of the integration of new development with surrounding neighbourhoods which can enhance connectivity between communities, including to green space and community facilities. This will have positive impacts on groups that are disproportionately impacted by air pollution and the adverse effects of climate change: particularly children and older people, Black, Asian and minority ethnic people, people who are pregnant and people with disabilities. The policy principle to seek involvement of underrepresented groups will help protect the character of places where this is linked to the identities and needs of particular groups. Inclusive design will be encouraged through integration with surrounding neighbourhoods. Policy PV1 therefore delivers positive impacts across most of the protected groups (except marriage/civil partnerships).

A.98 Policy PV2: Central Activities Zone (CAZ) supports a built environment conducive to healthy behaviours including a public realm that is resilient, safe, accessible and inclusive. This has the potential to benefit several vulnerable and protected characteristic groups including children and older people, women, religious and faith-based communities, the LGBTQ+ community, Black, Asian and minority ethnic communities, people who are pregnant and people with disabilities. However, the density of activities and new development in the CAZ could give rise to negative effects on health related to air quality, light and noise which would adversely affect these same groups. In addition, the dense, mixed urban form of the CAZ and its agglomerations of internationally significant activities generate distinct community safety and security matters, although the policy references the need to enhance and address the distinct safety and security requirements of the CAZ. The policy also supports investment in education and skills, delivery of affordable housing and accessible transport, with a particular aim to improve employment equality for those from disadvantaged or under-represented groups including young people, women, people from a minoritised background, and disabled and neurodivergent people. It seeks to reduce disadvantage by promoting a more inclusive CAZ economy through the availability of a range of business space and securing the delivery of affordable workspace. On balance, Policy PV2 is expected to have mixed positive and negative effects for most of the protected characteristic groups (except marriage/civil partnerships).

A.99 Policy PV3: Town centres and high streets supports improvements to the public realm, greening, safety and inclusion, including the delivery of a welcoming and barrier-free town centre and high street environment that meets the needs of all. It also supports the provision of active ground floor frontages which help to provide passive surveillance and support community safety. This could have positive impacts

for vulnerable and protected characteristic groups, for whom safety, security and accessibility in public spaces is a particular issue: children, older people, women, Black, Asian and minority ethnic people, religious and faith-based communities, the LGBTQ+ community, people who are pregnant and/or have young children, and people with disabilities. However, the policy also supports the intensification of development in town centres including the night-time economy, which could give rise to some negative impacts on air quality, light and noise, including from late-night uses. This may have negative impacts on some of the protected groups outlined above. On balance, Policy PV3 could have mixed positive and negative effects for most of the protected characteristic groups (except marriage/civil partnerships).

A.100 Policy PV4: Strategic economic clusters and corridors supports job creation in a range of economic sectors requiring different levels of skills and also in a range of locations in inner and outer London, which would help to provide a range of employment opportunities that people with most of the protected characteristics should be able to access. However, some of these jobs may not be accessible to all Londoners without investment in education and skills, delivery of affordable housing and accessible transport, which are outside of the remit of this policy. As a result, there is some uncertainty on the potential effect of Policy PV4 in relation to the accessibility of employment for all of the protected characteristic groups (except marriage/civil partnership). The policy also includes clauses to ensure that clusters and corridors are, or can be made, accessible and well-connected by public transport and active travel modes, helping to reduce carbon emissions and air pollution. This would have potential positive impacts on protected groups that are especially vulnerable to adverse climate and environmental conditions, including children and older people, Black, Asian and minority ethnic people, people who are pregnant and people with disabilities.

A.101 Policy PV6: Metropolitan Open Land establishes the framework for the designation and protection of Metropolitan Open Land (MOL), a London-specific strategic land-use designation. MOL offers opportunities for contact with nature, physical activity, active travel and tranquillity. Regardless of access arrangements, all MOL that is formed of green space also contributes to mitigating air and noise pollution and reducing urban heat impacts. Given the requirement for borough-led MOL enhancement strategies addressing accessibility, inclusivity and safety, the policy would have positive impacts on protected characteristic groups that are especially vulnerable to adverse climate and environmental conditions as well as those living in more deprived areas that may have less access to open space, and some groups likely to feel more at risk when using open space including children and older people, Black, Asian and minority ethnic people, women and girls, religious and faith-based communities, the LGBTQ+ community, people who are pregnant and people with disabilities.

A.102 Policy PV7: Sustainable development and enhancement of the green belt aims to significantly increase the quantum and diversity of housing supply, which has the potential to improve equality of access to housing for those who need it the most. In addition, by prioritising locations which are accessible by public transport, access to these new affordable homes will not be contingent on access to a private vehicle, which may be unviable for many households in London. This is expected to provide positive impacts for all protected groups except marriage and civil partnership. Through facilitating the release of greenfield land, the policy may result in the loss of existing carbon sinks and may increase exposure to climate risks such as the urban heat island effect having impacts on protected groups that are more vulnerable. The policy's emphasis on landscape led design is intended to promote inclusive, walkable environments that support active travel and provide good access to nature, with beneficial effects on health and wellbeing. This is likely to benefit all protected groups, though positive impacts would likely be greatest for children, older people, Black, Asian and minority ethnic people, people who are pregnant and people with disabilities. Therefore, Policy PL7: has positive impacts for most groups, with mixed positive and negative impacts for the most vulnerable communities outlined above.

A.103 Policy PV5: Suitable uses on industrial land and Policy PV8: Strategic and local views including the London View Management Framework, are not expected to directly affect any of the protected characteristics.

Conclusion and summary of the EqIA findings for the Draft London Plan

A.104 While the policies in the Draft London Plan do not all directly affect a number of the protected characteristics, where effects are identified, they are mainly positive. The Draft London Plan is therefore considered to be compatible with the three main duties of the Equality Act 2010.

A.105 The Draft London Plan's commitment to sustainable land use, and to achieve Good Growth, will provide varied benefits to all protected characteristics (except marriage and civil partnership). By providing Londoners with a range of housing and development typologies, it ensures that the accessibility needs of older people and people with limited mobility and disabilities will be met. Related policies also embed community consultation and a requirement to reflect diverse perspectives into design processes, with an aim to facilitate safe and inclusive places. An effective and sustainable approach to utilities capacity and connectivity also supports reduced carbon emissions, which will help to reduce and mitigate the adverse impacts of climate change. This will benefit vulnerable groups, including children, older people, Black, Asian and minority ethnic communities, people who are pregnant and people

with disabilities. While most impacts resulting from 'Making best use of land and achieving Good Growth' policies are positive for protected groups, there are some negative climate and environmental impacts that could arise from high-density development if climate resilience interventions are not integrated.

A.106 The Draft London Plan's policies for 'Delivering the homes and neighbourhoods Londoners need' seeks to ensure that housing options will be affordable, accessible and diverse. This will positively impact all protected groups, who are disproportionately impacted by economic deprivation, have greater accessibility needs than other demographics, and suffer from social exclusion and inequality of opportunity. Affordability is one of the key interventions in this set of policies, which may help to reduce health inequalities and enhance connectivity between different communities. The approach to accessible housing outlined in Policies HN8 and HN9 will particularly benefit older people, people who are pregnant and people with disabilities. Policy HN8: Housing design also includes a requirement for active ground floor frontages and overlooked open spaces in new residential development, which may improve safety and feelings of security for most of the protected characteristic groups. Policy HN4 sets out equitable accommodation delivery for Gypsies, Travellers and Travelling Showpeople, while Policy HN10 requires plan-making authorities to plan proactively and collaboratively for the expansion, re-use and long-term provision of burial space, recognising cultural and faith needs. Overall, this set of policies provides positive impacts for all protected groups (except marriage and civil partnership).

A.107 A commitment to social infrastructure, support for small independent businesses, provision of cultural activities and facilities and equitable access to employment and workspaces ensure that the Draft London Plan's policies for 'Growing London's economy in a way that benefits all' have wide-ranging positive impacts for most of the protected groups (except marriage and civil partnership). Policies GLE11 to GLE13 will provide positive impacts primarily by mitigating air and noise pollution, carbon emissions and the adverse impacts of climate change.

A.108 While most of the effects of the Draft London Plan are positive, there may be some negative effects associated with increased air pollution from development, particularly in relation to economic growth initiatives, development density and the promotion of new data centres through Policy GLE3: Data centres. Certain groups may be particularly vulnerable to the impacts of air pollution, such as older and very young people, pregnant people, Black, Asian and minority ethnic communities (who are more likely to live in areas with poorer air quality) and those with certain health conditions. However, the relevant policies include measures seeking to protect amenity which should provide mitigation for these potential negative effects.

A.109 'Creating a greener, healthier, and resilient city' policies primarily benefit communities that are disproportionately affected by pollution and the adverse impacts of climate change. These groups include children, older people, Black, Asian and minority ethnic communities, people who are pregnant and people with disabilities. Some wider-ranging positive impacts are associated with Policy GHR8 seeking equitable access to nature and open space, which is likely to reduce existing inequalities, particularly for those in flats who may not have access to a garden.

A.110 Many of the 'Place visions and place-based approaches' policies in the Draft London Plan have a positive or mixed positive and negative impact on equality. Policies PV2 and PV4 relate to economic development areas and associated improvements to accessibility, safety, and employment opportunities. Though these interventions are likely to have positive impacts for protected groups, increased development density and limited sustainable transport connectivity are potential barriers to equality that could bring about negative impacts. Policy PV3: Town centres and high streets is likely to benefit most protected groups through a suite of interventions including public realm improvements, restrictions on concentrations of certain sui generis building uses, and support for diverse local market opportunities.

Appendix B

Consultation comments received in relation to the IIA Scoping Report

Table B.1: Responses to representations received on the IIA Scoping Report consulted upon between 19 December 2025 and 13 February 2026

Consultee	Comment	GLA's response
Environment Agency	Relevant plans and programmes: The IIA should refer to the aims of the Thames Estuary 2100 plan for a broader context. The Climate Change section lacks the Environment Improvement Plan 2025, published on December 1, 2025. It also omits the Mayor's 10-year Clean, Healthy Waterways plan and the GLA Green/Grey Belt assessment methodology, though a review is in progress. Regulatory frameworks such as the Environmental Permitting Regulations 2016 and Building Act 1984, crucial for drainage issues, are relevant. The WRSE Regional Plan (June 2025) outlines water supply strategies for the next 50 years. Additionally, the scoping of Heat Risk is welcomed, with expectations for inclusion of the forthcoming London Heat Risk Delivery Plan. Future considerations should include the next River Basin Management Plan cycle starting in 2027, and statutory plans mandated by the Environment Act 2021, especially the Drainage and Wastewater Management Plan involving the GLA as key consultants addressing climate change and growth over the next half-century.	The referenced documents have been reviewed with corresponding updates made to the relevant sections of the IIA report.
Environment Agency	Baseline data: There are several identified issues in the document, including statistical and data errors with provided corrections, unreferenced claims requiring substantiation, and the omission of infrastructure and funding needs for flood, water, and environmental considerations. The climate change section addresses flood topics but overlooks water supply resilience. Although the London climate resilience review is referenced, there is a lack of monitoring on its delivery. The Thames Estuary 2100 Plan is supported, as is its inclusion in relevant plans and policies. However, key documents regarding Flood and Water are missing, and while land use is recognized as a	The key recommended documents regarding issues of flood and water supply resilience have been reviewed with corresponding updates made to the relevant sections of the IIA report. The highlighted statistical and data errors have been corrected and references clarified.

Consultee	Comment	GLA's response
	sustainability issue, there are critical linkages lacking concerning waste, industrial land, and target self-sufficiency.	
Environment Agency	Key issues: We agree with the key sustainability issues identified in Chapter 4. The key issues do not draw out all sustainability issues associated with monitoring and targets for flood, waste, and water management, specifically noting the risks of not meeting net self-sufficiency and the implications for the Circular Economy. Targets quoted on pg. 102 are deemed unachievable, as detailed in feedback submitted in January 2026 regarding the 'Progress on Priorities' consultation. The statements regarding the importance of rail/river transport for the movement of aggregates, waste and general freight (paragraph 3 p104) should be reflected in the transport section (p33) as it plays an important role in reducing the carbon footprint of the transport sector in London in addition to the logistical importance.	Comments noted. Transport section has been updated to reflect importance of rail/river transport for the movement of aggregates, waste and general freight.
Environment Agency	IIA framework: The proposed set of questions fail to address conflicts between regulated industry and development, suggest including a prompt question under strategic spatial options related to development employing the agent of change when in proximity to industrial sites or sensitive receptors. The interplay of Objective 3 spatial question 3 and Objective 1 is not clear, and some specific cross reference may be useful. Suggest update to prompt question 7 (Objective 1) to refer to 'enhance' alongside protect. Suggest additional prompt questions for Objective 3 (Economic potential) relating to circular economy and creating opportunities to move waste and material management up the hierarchy, and for Objective 7 (Climate Change) regarding flood defence maintenance and management measures to mitigate future flood risk.	Comments noted. As set out in the draft Scoping Report, the identified prompt questions are not the only considerations to be taken into account when determining likely effects, and for practical purposes the questions cannot be exhaustive.

Consultee	Comment	GLA's response
Historic England	Relevant plans and programmes: Recommend that several international conventions are reviewed: • UNESCO World Heritage Convention • European Landscape Convention • The Convention for the Protection of the Architectural Heritage of Europe • The European Convention on the Protection of • Archaeological Heritage (especially Article 5) In assessing any potential effects of the plan on World Heritage Sites, you should also have regard to UNESCO's Guidance and Toolkit for Impact Assessments in a World Heritage Context. Legislation and national policy for applications under parallel consenting regimes, that include historic environment provisions and are relevant to the Greater London Area, include: • Marine and Coastal Areas Act 2009 and Marine Policy • Statement - National Policy Statements (e.g. for energy, waste and water resources infrastructure) Welcome reference to Historic England's guidance, with a particular focus on Advice Note 4 on Tall Buildings. It would also be helpful to put a spotlight on our recently published advice note: • Adapting Historic Buildings for Energy and Carbon Efficiency (Historic England Advice Note 18). Strategic and Local Borough Plans contain proposals with potential implications for townscape and heritage, as does the South East inshore Marine Plan. Where relevant and necessary to assess the potential effects of any broad locations for growth, other local documents such as Conservation Area Appraisals and Management Plans will also be helpful. In relation to	The referenced documents have been reviewed with corresponding updates made to the relevant sections of the IIA report.

Consultee	Comment	GLA's response
	World Heritage Sites, their Management Plans and any published Setting Studies will be a useful resource. In relation to the River Thames and its environs, consideration should also be given to the strategic aims of the Joint Thames Strategies, which contain helpful information on landscape character and heritage. Note that a refresh of these strategies is ongoing. Boroughs' Archaeological Priority Area Reviews provide a useful strategic framework for assessing the potential for, and significance of, non-designated heritage assets of archaeological interest based on information held in the Greater London Historic Environment Record.	
Historic England	Baseline data: Welcome the recognition of the breadth and diversity of London's heritage and its benefits to the economy, culture and quality of life. On p67, preference to remove the bracketed text that identifies Kew Gardens as 'Victorian' due to the earlier and later layers of its history and development. On p67-68 re designated heritage assets it may be helpful here to highlight some of the key sources of information such as the National Heritage List for England, and World Heritage Site Management Plans. Following the list of designated heritage assets, we suggest that the report highlights that there are many more non-designated heritage assets which can be found on the Greater London Historic Environment Record. Furthermore, there are areas of significant known archaeological interest or potential for new discoveries, reflected in London's Archaeological Priority Areas. Considering the landscape of London broadly, there are a number of useful sources of baseline information in addition to those mentioned here, including: - All London Green Grid - Joint Thames Strategies (currently undergoing review).	Comments noted and corresponding updates made to the relevant sections.

Consultee	Comment	GLA's response
	While we welcome a reference to the London Historic Character Thesaurus, this could helpfully be supplemented with a reference to the Greater London Historic Characterisation Map which, while not currently widely available, has been provided to the GLA as a source of information to inform the London Plan. Borough level characterisation studies will also provide a useful source of information. For a more strategic examination of London's Local Character and Density we recommend you consult our 2016 report commissioned to inform the last London Plan. Information on the contribution of the economy can be found in Heritage Counts.	
Historic England	Key issues: Relating to Climate Change Mitigation and Adaptation, in addition to the issues identified, it would be helpful if the report identified the role of London's existing building stock, and its appropriate re-use and retrofit, as a factor in climate change adaptation and mitigation. Similarly, our streets, parks and other open spaces have a role in climate change mitigation and adaptation, for example in managing rainwater, flood risk and heat risk, and as green transport corridors. On Health and Community Safety, the report notes that the built environment impacts on health outcomes, and has a role in enabling healthy behaviours. We suggest firstly that this is expanded to recognise the role of the natural environment (such as parks). Secondly, we suggest that the report recognises the positive role of the built, natural and historic environment in securing both physical and mental health, provided that it is appropriately designed, protected and maintained. See our research reports on wellbeing and heritage. On Successful Placemaking, while we welcome this section, we suggest a slight adjustment to the first paragraph in line with planning terminology:	Comments noted and requested amendments to first paragraph of Successful Placemaking made. Reference to the importance of heritage based tourism to sustaining London's economy and the highlighted report added to the baseline data section.

Consultee	Comment	GLA's response
	“However, the importance and significance of heritage and character can be challenged by pressure for development resulting in the loss or erosion of the <u>integrity of character or significance of landscapes, townscapes or heritage assets and related views and settings. While lack of investment can result in more heritage assets falling into the ‘at risk’ category, appropriate new development can secure a viable future for heritage assets currently identified as at risk.</u>” It would be helpful if paragraph 4.27 recognised the risk to heritage assets of insensitive development: “The scale of development required to meet housing targets and other growth needs is likely to drive rapid and substantial change in places across the capital which could risk the erosion of place distinctiveness/sense of place, <u>or harm to heritage assets</u>”. We suggest that paragraph 4.28 is supplemented with additional text to recognise the role of heritage-led regeneration in revitalising town centres and high streets. Relating to Economic Potential and Employment, it would be helpful if this section identified the importance of sustaining heritage-based tourism as an important component of London’s economy. Most of the top 10 visitor attractions in England are in London and occupy listed buildings. Some of these, such of the Tower of London, are heritage attractions in their own right. All four of London’s World Heritage Sites are in the top 20 [See reference 60].	
Historic England	IIA Framework: Suggest a new prompt question is added to IIA objective 3: Economic potential that tests where policies will sustain London’s culture and heritage as sources of employment and tourism. Suggest a new promote question that tests where policies will promote the sensitive re-use, retrofit and adaptation of the existing building stock.	Suggested strategic policy development prompt question for IIA objective 3: Economic potential added. As set out in the draft Scoping Report, the identified prompt questions are not the only considerations

Consultee	Comment	GLA's response
		to be taken into account when determining likely effects, and for practical purposes the questions cannot be exhaustive.
Historic England	IIA Framework/Objective 4: The London Plan will have an important role in steering the scale and form of future development. While objective 4 is generally to be welcomed, we believe that it is too broad to enable effective assessment of landscape/townscape and heritage. We therefore suggest that the objective is split, with the second half being replaced by the following objective: “Promote types and forms of development that conserve and enhance London’s heritage, respond to local character and, where appropriate, deliver regeneration and change, in a way that secures attractive and cohesive landscapes and townscapes.” Should our recommendation above for Objective 4 be carried forward, it would be helpful if the sub-objectives and prompt questions were accordingly amended and refined. We suggest that prompt question 6 is amended as follows: • Support the conservation and enhancement, and enjoyment (access, affordability, interpretation, understanding) of ~~character~~ heritage assets, appropriately managing ~~direct and indirect~~ risks to their <u>significance</u>, <u>including as a result of development in their settings</u> integrity? Should prompt question 10 (strategic spatial options) be retained, we suggest the following adjustments: “Protect, <u>enhance and better reveal</u> the <u>significance</u> ~~integrity~~ of designated and <u>non-undesignated</u> ~~character~~ <u>heritage</u> assets, ~~avoiding or minimising harm arising from insensitive development of the asset itself or within its setting either directly or through avoiding impacts~~	A new standalone IIA objective has been added in relation to conserving and enhancing assets of historical and archaeological importance and their settings, and related prompt questions developed having regards to Historic England suggestions. As part of the creation of this new IIA objective, the reference to cultural and historic assets and any relevant prompt questions were moved from IIA objective 4 which originally covered the historic environment amongst other things, to new IIA objective 9.

Consultee	Comment	GLA's response
	~~on their setting~~; <u>protect</u> key views, or <u>affect the</u> ability to implement a relevant management plan?" New prompt questions might ask whether the policy will: Support types and forms of development that respond appropriately to evidence about local character? Assist in identifying appropriate circumstances for development to deliver more transformative regeneration and change? Promote types and forms of development that will conserve or create (as appropriate) attractive and cohesive landscapes and townscapes?	
Natural England	Relevant plans and programmes: Natural England has not conducted a full review the plans listed. However, we advise that the following types of plans relating to the natural environment should be considered where applicable to your plan area: • Green infrastructure strategies • Biodiversity plans • Rights of Way Improvement Plans • River basin management plans, particularly Thames RBMP • Relevant landscape plans and strategies, particularly Surrey Hills National Landscape, Kent Downs National Landscape, Chilterns National Landscape • Local Nature Recovery Strategy Natural England recognises that the Scoping Report includes a wide range of relevant environmental plans and policies, including the Environment Act 2021, the 25 Year Environment Plan, the Mayor's strategies, biodiversity duties, and national planning policy. While reference is made to the LNRS we would advise that the LNRS should be more directly embedded into the IIA due to its statutory role once fully published and its importance in identifying	Comments noted. Highlighted plans have been considered as applicable to the London Plan IIA, and updates made to relevant sections of the IIA to reflect publication of the London Local Nature Recovery Strategy (London LNRS).

Consultee	Comment	GLA's response
	priority locations for nature recovery, ensuring ecological connectivity, and aligning spatial development with biodiversity enhancement opportunities. The Scoping Report already recognises the importance of nature recovery and green infrastructure but should integrate the LNRS more clearly within the assessment framework.	
Natural England	Baseline data: Natural England acknowledges the extensive and well-organised baseline information, including detailed environmental, biodiversity, air quality, climate and landscape data.	Comments noted.
Natural England	Key issues: On water resources, the Scoping Report correctly identifies London as water-stressed, with increasing flood risk and complex water infrastructure challenges. It would be valuable to acknowledge that improvements can be made to the status of rivers and waterways (the blue infrastructure network). On nature recovery as a strategic land-Use priority, the Report acknowledges biodiversity stress and opportunities for enhancement, including through Biodiversity Net Gain (BNG). However, nature recovery should be viewed as a cross-cutting driver informing land allocation and growth options. On cumulative and in-combination effects, given the scale of development required (87,992 homes annually), cumulative effects on biodiversity, green space, ecological networks and water infrastructure should be more explicitly framed as a key issue.	Comments noted and corresponding updates made to biodiversity and ecosystem services section in relation to cumulative effects as a key issue.
Natural England	IIA framework: In relation to IIA objective 1, given London's brownfield context, the baseline should include soil ecosystem service value, levels of contamination, and risks from soil sealing. There is a risk that in some situations, development on land of limited biodiversity value in its own right can lead to the creation of islands of biodiversity, permanently severed from other areas. We thus suggest adding "Ensure current ecological networks are	Comments noted. The reference to geodiversity assets in objective 4 has been moved to objective 8 so that geodiversity can be considered alongside biodiversity, with a new sub-objective added to reflect this. Strategic policy development prompt

Consultee	Comment	GLA's response
	not compromised, and future improvements in habitat connectivity are not prejudiced?" In addition, the implementation of the LNRS will help to promote connectivity at the landscape scale. On Objective 4, here the promotion of creating mixed use and dynamic new places as part of the plans for London including impacts on the landscape and geodiversity cover aspects we would agree are important for London. Given the extensive green belt and the impact on landscape from new development this will be a key objective to assess policies against when looking at how the large new housing figures. On Objective 5 we welcome the consideration of health and wellbeing in the context of the natural environment and access to greenspace. There are questions relating to enhancing provision of improved connectivity and access to natural greenspace but none relating to impacts on existing access to greenspace. We would advise that additional wording is included to explicitly state avoidance of impacts on the quality and extent of the existing recreational assets. On objective 7 Climate Change, the issues section should highlight the interdependence of nature and climate resilience, including roles of vegetation in cooling, flood attenuation, air quality improvement and ecological buffering. The scale of proposed housing poses a big challenge within the new plan, but this does also allow for a big improvement in various parts of London with regard to access to green space and its multitude of benefits. Climate change impact baselines should include heat vulnerability mapping, given the increased frequency of extreme heat events. The capital has a huge population at risk from urban heat island effects, and it should therefore ensure that with as much new housing as is planned this impact is avoided	question 3 of objective 8 relates to the conservation and enhancement of London's Nature Recovery Network and priority habitat and species, which has regard to the LNRS. As set out in the draft Scoping Report, the identified prompt questions are not the only considerations to be taken into account when determining likely effects, and for practical purposes the questions cannot be exhaustive.

Consultee	Comment	GLA's response
	through good design. A large amount of this can be achieved purely through green and blue infrastructure on sites being improved or introduced or bolstered where some already exists. In objective 8 biodiversity and ecosystem services we note that there is no reference to the LNRS within this objective. Consideration should be given to landscape-scale habitat connectivity, long-term resilience to climate impacts, strategic nature recovery network enhancement. Advise that a question is included to capture the requirement for policies and strategic options to have regard to the LNRS, delivering the identified measures to ensure landscape scale connectivity.	
Backdoor Housing Co-op	The final IIA Scoping Report should: • Explicitly scopes cooperative and community-led housing as a distinct tenure and delivery pathway across SA/SEA, EqlA, HIA and CSA • Includes objectives and assessment questions that test whether the Plan enables CLH/co-operative housing • Requires assessment of the adequacy of the housing evidence base, including CLH/co-op demand and distributional impacts • Scopes reasonable alternatives that include cooperative/CLH-led delivery and retrofit-first regeneration approaches • Proposes monitoring that reports delivery by tenure, delivery model and social value outcomes, including CLH/co-operatives	Comments noted. IIA objective 2: Housing includes consideration of housing quantity, quality, affordability, and mix, including securing housing mix that is sufficient to provide choice and best meet needs. As set out in the draft Scoping Report, the identified prompt questions are not the only considerations to be taken into account when determining likely effects, and for practical purposes the questions cannot be exhaustive. The IIA objectives set the framework against which emerging policies in the Plan are assessed. They are distinct and separate from the Good Growth objectives in the Plan. The purpose of the baseline information is to establish the current conditions against which the Plan's

Consultee	Comment	GLA's response
		effects are assessed. Evidence base which informs the Plan, such as the SHMA, is being updated separately and will be published alongside the draft Plan. The appraisal of reasonable alternatives and consideration of monitoring indicators are reported in the IIA report published alongside the draft London Plan.
City of London Air Quality Team	Air quality needs to be an integral topic within the proposed framework. The intensification of use of limited space will have implications for air quality, and therefore health, from a significant risk of increasing congestion, road traffic emissions, and pollutant emissions from other sources both from completed developments, and during demolition and construction activities. Also of concern is that inappropriately located development such as data centres are being built near residential development. There is a growing trend to install diesel back-up generators for emergency power in large housing developments and commercial buildings, which may also be for business continuity in the latter case. Whilst in principle the creation of mixed-use places that reduce the need to travel by private car are welcome, in reality this can be offset by increased number of servicing and delivery vehicles. More focus needs to be placed on enabling sustainable or zero-emission public transport. There needs to be more focus on decreasing emissions from development. Both transport (including servicing and delivery vehicles, as a 'car free' development has limited effect) and building emissions through heating and energy provision must be considered. The objective to 'Reduce CO ₂ emissions from all sources' is welcome and should include emergency power supply (especially data centres) and transport emissions. There is	Comments noted. Air quality is explicitly considered under IIA objective 5: Health and community safety. The highlighted issues will be considered as part of the IIA process and more widely in developing the policy approaches in the draft Plan.

Consultee	Comment	GLA's response
	significant potential to reduce NO _x and particulate emissions, alongside reductions in CO ₂ , at source by moving away from combustion processes.	
CPRE London	While the baseline data is wide-ranging, CPRE London considers that it relies too heavily on headline indicators and lacks sufficient functional and spatial detail in several key areas including in relation to Green Belt, MOL and open space. Consider that the Scoping Report doesn't sufficiently reflect London's role as a functional city-region and underplays to role of major strategic transport investment in shaping development patterns. There is insufficient recognition of social infrastructure as a land-use issue. Concerned by reference to higher housing targets set by national government and Green Belt release in the key issues, and that this risks pre-determining the outcome of the assessment. Broadly agree with the sustainability themes identified but consider that several are insufficiently framed around cumulative and indirect impacts. While the framework recognises the need to assess reasonable alternatives, it does not yet demonstrate that alternatives will be genuinely distinct. It is not clear that avoidance-led options which minimise harm to Green Belt and Metropolitan Open Land, or alternative delivery trajectories reflecting economic uncertainty, will be meaningfully tested.	Comments noted. The purpose of the baseline information is to establish the current conditions against which the Plan's effects are assessed. Evidence base which informs the Plan, such as the Green Belt review, is being prepared separately and will be published alongside the draft Plan. The IIA objectives set the framework against which emerging policies in the Plan are assessed. The highlighted issues will be considered as part of the IIA process and more widely in developing the policy approaches in the draft Plan. The appraisal of reasonable alternatives is reported in the IIA report published alongside the draft London Plan.
GiGL	GiGL can support the GLA to extract relevant information from our species data on specific numbers for the protected and priority species in the capital and from our Areas of Deficiency which takes into account the Sites of Importance for Nature Conservation (SINCs) network. We agree that biodiversity needs to become part of development policy and as highlighted new development puts pressure on sites and wider green infrastructure. GiGL could support the GLA with analysing ours and external data spatially and quantitatively for the assessment of the impacts of emerging policies and alternatives. Highlight the importance of data sharing in order to assess and	Comments noted. Proposed monitoring indicators are reported in the IIA report published alongside the draft London Plan.

Consultee	Comment	GLA's response
	monitor the objectives and how well certain policies are delivering for people and nature. Sharing of data is also very important to enhance and improve the existing evidence base, allow for complementary enhancements and ensure data are re-used in decision making, whether it's at a local plan level or for a specific development.	
Impact on Urban Health (Southwark)	Specific suggestions for wording changes to prompt questions and/or additional prompt questions in relation to IIA objectives 2 (Housing), 5 (Health and community safety)	Comments noted. As set out in the draft Scoping Report, the identified prompt questions are not the only considerations to be taken into account when determining likely effects, and for practical purposes the questions cannot be exhaustive.
Individual	Assessments should evaluate policy approaches and alternatives for their impact on human-scale experiences and long-term wellbeing. Additionally, permeability should be considered in terms of movement quality and urban continuity, with strategic decisions impacting accessibility and social cohesion. Assessing different approaches to permeability must consider climate, health, and equality outcomes for active travel, while recognizing necessary trade-offs between reconnection, wellbeing, and environmental value. The IIA should evaluate strategic design policies alongside heritage considerations relative to climate and lifecycle performance. Material selection and construction methods require comprehensive assessment beyond carbon metrics to consider adaptability and reuse. Demolition is often the default, risking the loss of adaptive potential in existing structures; policies should assess alternatives that integrate these structures instead. Lastly, circular economy success relies on infrastructure and governance during operation,	Comments noted. As set out in the draft Scoping Report, the identified prompt questions are not the only considerations to be taken into account when determining likely effects, and for practical purposes the questions cannot be exhaustive.

Consultee	Comment	GLA's response
	necessitating realistic policy assessments rather than assumptions of voluntary compliance.	
Individual	In relation to plans and programmes consider the following areas have not been given sufficient consideration: Gentrification and its impacts on existing communities; loss of the high street and traditional retail environments; loss of communities and community cohesion; London's energy security, particularly regarding the rollout of new technologies such as data centres; impact on culture and the arts, impact on social infrastructure including religious buildings, public houses and other community assets.	Comments noted. The review of plans and programmes and the baseline data cover the referenced areas as relevant to the IIA scope.
Just Space	The proposed approach makes many broad assumptions that limit the scope of assessment. There is an assumption that all forms of housing delivery are inherently a benefit, which ignores key considerations. There needs to be a first-principles assessment of the inability of the current system to deliver in line with need and the good growth objectives in the current London Plan. The simplistic and un-evidenced approach of central government – that housing unaffordability is fundamentally a function of supply – cannot be simply absorbed and regurgitated if the core objective of the IIA is to be met. The prompt questions to IIA Objective 2 (housing) fails to ask whether the (policy) option will provide the opportunity to deliver additional affordable/ social housing (whether through the speculative housing model or through public funding). Our experience has shown that development has resulted in an extensive displacement of small and independent businesses, contrary to the London Plan objectives to support them and include them in growth. This has especially impacted businesses run by and serving those from global majority	Comments noted. IIA objective 2: Housing includes consideration of housing affordability. As set out in the draft Scoping Report, the identified prompt questions are not the only considerations to be taken into account when determining likely effects, and for practical purposes the questions cannot be exhaustive. The IIA objectives set the framework against which emerging policies in the Plan are assessed. They are distinct and separate from the Good Growth objectives in the Plan. The highlighted issues will be considered as part of the IIA process and more widely in developing the policy approaches in the draft Plan. The purpose of the baseline information is to establish the current conditions against which the Plan's effects

Consultee	Comment	GLA's response
	ethnic groups. This is relevant to assessments of equalities, good growth and socioeconomics, but has been overlooked in the proposed IIA scope. There is a need to consider the impact of the London Plan on reducing carbon emissions from construction (through the use of materials which sequester carbon, for example) and assessing the benefits of development against the carbon cost. The Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA), requirement will not be satisfied without a genuinely strategic evaluation of the alternative(s) which the London Plan implicitly rejects. This sort of analysis is missing from the draft. We are somewhat encouraged by Appendix B of the present draft Scoping Study which does at least provide some baseline survey of some of the key inequalities of London. Other comments provided relate to policy considerations for the new London Plan.	are assessed. Evidence base which informs the Plan, such as the SHMA, is being updated separately and will be published alongside the draft Plan. An assessment of impacts on equality forms an integrated part of the IIA framework through use of a specific assessment objective in relation to equality of opportunity (objective 6). In addition, a separate standalone EqlA focusing on potential impacts on groups with protected characteristics is included in the IIA report published alongside the draft London Plan. The appraisal of reasonable alternatives is reported in the IIA report published alongside the draft London Plan. The wider issues raised in the comments will be considered in developing the policy approaches in the draft Plan.
LBHF Inclusive Environment Disability Residents Team	Support the strong emphasis on equality within the IIA framework; however, we believe the assessment must go further in capturing the lived experience of disabled Londoners, who continue to face persistent and structural barriers in housing, transport, the public realm, and personal safety. The report acknowledges several significant gaps, including the limited provision of step-free access across the London transport network, extremely low levels of accessible housing, and broader inequalities that disproportionately affect	Comments noted. An assessment of impacts on equality forms an integrated part of the IIA framework through use of a specific assessment objective in relation to equality of opportunity (objective 6). In addition, a separate standalone EqlA focusing on potential impacts on groups

Consultee	Comment	GLA's response
	disabled people. We therefore encourage the GLA to strengthen the integration of accessibility and inclusive design across all IIA objectives, ensure disability-specific data is fully embedded in the baseline evidence, and commit to meaningful involvement of disabled residents at each stage of the London Plan review.	with protected characteristics is included in the IIA report published alongside the draft London Plan.
London Borough of Barking & Dagenham	Encourage the IIA scope to include young children within those at a higher vulnerability to heatwaves and minimising whole life cycle carbon within their climate change mitigation objectives. Encourage the IIA objectives to consider how policies <u>directly and indirectly</u> protect the physical integrity of designated sites of international, national, and local importance. For clarity, we recommend specifying the main designations for these sites, i.e. SSSI, LNR, SINCE, etc. The scope should clearly identify ecosystem service benefits – in addition to access to nature, the following benefits should be included: wildlife, flood mitigation, air quality, carbon storage, cooling, recreation, and wellbeing. Access to green infrastructure to provide opportunities for recreation, amenity and tranquillity should be balanced with the need to ensure ecological protection.	Comments noted.
London Cycling Campaign	Response focuses on the draft Scoping report's contribution to achieving the Mayor's Transport Strategy declared target of increasing the share of trips by public transport, walking and cycling in London to 80% by 2041.	Comments noted. As set out in the review of plans and programmes, the objectives of the Mayor's Transport Strategy have informed both the identified of key issues and the development of the IIA Framework and its objectives. The IIA objectives set the framework against which emerging policies in the Plan are assessed.

Consultee	Comment	GLA's response
London Gypsy and Travellers	Recommend defining the terms "deprivation" and "marginalisation" for each protected characteristic under the Equality Act 2010, and outlining methods for assessing the reduction of deprivation and marginalisation. Suggest that the relationship of needs to the respect, protection and fulfilment of economic, social and cultural rights be made explicit, however briefly. Suggest ordering the chapters or sub-chapters of the IIA according to the policies of the London Plan, with a clear listing of impacts on Londoners with protected characteristics, with attention to how these characteristics intersect. The indicators of improvement should be specific to each combination of policy-impact-Londoners (in their rich intersectional diversity). Presenting these combinations as a table would make the assessment easy to understand. Suggest that consideration for the needs of Gypsies and Travellers should be prompted in every relevant topic, along with the needs of other specific groups with protected characteristics (who have been historically overlooked, resulting in deprivation and marginalisation). Recommend the involvement and co-production with community expertise, especially those communities whose deprivation and marginalisation are structured by protected characteristics, in the formulation of evidential benchmarks. London's communities will benefit from responsiveness and transparency in the monitoring of the impact of policies on them.	Comments noted. The IIA report published alongside the draft plan presents finding for the draft London Plan ordered by the policies of the plan. As set out in the draft Scoping Report, the identified prompt questions are not the only considerations to be taken into account when determining likely effects, and for practical purposes the questions cannot be exhaustive. An assessment of impacts on equality forms an integrated part of the IIA framework through use of a specific assessment objective in relation to equality of opportunity (objective 6). In addition, a separate standalone EqIA focusing on potential impacts on groups with protected characteristics is included in the IIA report published alongside the draft London Plan. Proposed monitoring indicators are included in the IIA report published alongside the draft London Plan.
LSE London Research Group	There is an absence of a baseline projection of likely outcomes over an extended period if the current planning strategy remained in place, and of alternatives to this. There should not be acceptance of the government-endorsed housing target without testing. To effectively harness release of Green to wider objectives of building sufficient homes and maintaining both socially valuable green land and open space and acceptable energy use there	Comments noted. The IIA objectives set the framework against which emerging policies in the Plan are assessed. The highlighted issues will be considered as part of the IIA process and more widely in developing the policy approaches in the

Consultee	Comment	GLA's response
	must be a clear lead from the London Plan. This must spell out in specific detail the criteria for where Green Belt land should be released and how much to release.	draft Plan. Evidence base which informs the Plan, such as the Green Belt review, is being prepared separately and will be published alongside the draft Plan. The appraisal of reasonable alternatives is reported in the IIA report published alongside the draft London Plan.
London Housing Panel	There is a disconnect between the Mayor's Equality Objectives and their implementation in planning, particularly regarding the Integrated Impact Assessment (IIA) in the emerging London Plan. Utilizing protected characteristics from the Equalities Act (2010) to evaluate policy impacts for various communities and health outcomes is advocated for a more integrated approach. Concerns from the London Housing Panel highlight inadequate engagement with at-risk communities during the IIA process, despite available data on specific groups like LGBTQ+ individuals. The need for a comprehensive integration of equality and housing considerations is emphasized along with calls for detailed monitoring of policy effectiveness. Panel members recommend ongoing impact assessments, real-time monitoring, and improved communication from the GLA stressing that well-structured engagement is crucial for addressing community needs throughout the policy development process. Additionally, concerns about the environmental impacts of housing developments on health are raised.	Comments noted. An assessment of impacts on equality forms an integrated part of the IIA framework through use of a specific assessment objective in relation to equality of opportunity (objective 6). In addition, a separate standalone EqIA focusing on potential impacts on groups with protected characteristics is included in the IIA report published alongside the draft London Plan. Proposed monitoring indicators are included in the IIA report published alongside the draft London Plan.
Mott MacDonald	Highlights several London-wide strategies that should be considered as part of the plans and programmes review. Baseline considered suitable high level for a strategic assessment, however, suggests additional datasets could be relevant including in relation to digital exclusion, job quality and insecure work, disaggregated equality data, childcare accessibility, neighbourhood level	Comments noted. The referenced documents and datasets have been reviewed with corresponding updates made to the relevant sections of the IIA report where appropriate. The appraisal of

Consultee	Comment	GLA's response
	climate vulnerability, flood risk modelling, industrial land pressures, and data on impacts from data centres and energy system capability. Broadly agree with key sustainability issues identified and suggest that London's unprecedented uncertainty requires multiple growth scenarios rather than reliance on a single trajectory. Consider the IIA objectives provide a sound foundation but many of the assessment questions are overly generic.	reasonable alternatives is reported in the IIA report published alongside the draft London Plan. As set out in the draft Scoping Report, the identified prompt questions are not the only considerations to be taken into account when determining likely effects, and for practical purposes the questions cannot be exhaustive.
NHS HUDU	Suggestions for minor rewording of objectives, sub-objectives and additional prompt question to enable positive policy wording, including splitting objective 5 into two objectives – one focusing on health, wellbeing and health inequalities, and one focusing on community and individual safety and fear of crime. Baseline should consider the proximity, physical accessibility and affordability of social infrastructure and green space in relation to deprived neighbourhoods. Reference should be made to the age of the NHS estate and how this relates to the NHS 10-year plan.	Comments noted. As set out in the draft Scoping Report, the identified prompt questions are not the only considerations to be taken into account when determining likely effects, and for practical purposes the questions cannot be exhaustive. The baseline data has been updated to reflect the condition of the NHS estate and ambitions of the NHS 10-year plan.
Peabody	Highlights several documents relevant to the perspective of a social housing provider that could be included in the plan and policies review, and that the framework should better recognise the financial and delivery constraints affecting housing associations, including construction cost inflation, labour and skills shortages, and grant funding pressures, all of which influence the feasibility of sustainable development and affordable housing delivery. The baseline data presented is generally comprehensive, but additional housing-focused evidence would strengthen its relevance and practical value. Greater consideration of local infrastructure capacity, including access to primary care, wastewater constraints and school place planning, would help ensure the IIA	Comments noted. The IIA objectives set the framework against which emerging policies in the Plan are assessed. The highlighted issues will be considered as part of the IIA process and more widely in developing the policy approaches in the draft Plan. As set out in the draft Scoping Report, the identified prompt questions are not the only considerations to be taken into account when determining likely effects,

Consultee	Comment	GLA's response
	reflects real-world development feasibility and place-based pressures in both existing and growth areas. broadly agree with the sustainability issues identified, but several areas merit stronger emphasis from a social housing and resident wellbeing perspective. The IIA objectives and assessment questions provide a broadly sound framework but could be strengthened through clearer recognition of the role of social housing and the delivery realities facing affordable housing providers operating within tight financial and regulatory frameworks. In particular, objectives relating to housing should explicitly reference social housing and genuinely affordable provision, reflecting London's housing crisis and the importance of secure, low-cost homes to wider sustainability outcomes including health, stability and economic inclusion. equality objectives could be sharpened further to ensure the needs of disabled residents, older people, migrants and low-income families are fully reflected in the assessment approach and monitored through measurable outcomes over time.	and for practical purposes the questions cannot be exhaustive. An assessment of impacts on equality forms an integrated part of the IIA framework through use of a specific assessment objective in relation to equality of opportunity (objective 6). In addition, a separate standalone EqIA focusing on potential impacts on groups with protected characteristics is included in the IIA report published alongside the draft London Plan.
Sport England	The IIA should refer to the aims of the 'Sport for all of us – the Mayor's strategy for sport and physical activity'. Additional information should be added to the baseline data with respect to sport, recreation and physical activity. Agree that that the sustainability issues included in this document are all important but considers that more could be added to these to ensure that the London Plan supports the Mayor's strategy for sport and fulfils the requirements of the relevant paragraphs of the National Planning Policy Framework. Suggest that prompt questions for objective 4 (Successful placemaking) should specifically mention that successful placemaking require sufficient access to social, physical and health infrastructure. Suggest that prompt question should be added to objective 5 (Health and community safety) in relation to promoting access to sports facilities that contribution to	Comments noted. The referenced document has been reviewed with corresponding updates made to the relevant sections of the IIA report. Suggested strategic policy development prompt question for IIA objective 5 has been added. Prompt questions for IIA objective 6 includes reference to promoting access to and provision of appropriate community social infrastructure including playgrounds and sports facilities, and to open spaces.

Consultee	Comment	GLA's response
	health and wellbeing. Suggest that prompt questions for objective 6 (Equality of opportunity) should make reference to being adequately served by facilities like open space, sports and recreational buildings.	
Surrey County Council	Surrey, like other regions adjacent to London, has significant links to the capital in terms of housing markets, transport networks, waste management, and economic interdependencies. Suggest inclusion of reference to a number of Surrey plans and policies with the review of plans and programmes, and the inclusion of contextual statistics from outside London in the baseline data. Suggest that there should be objectives and prompt questions on the impacts on the wider South East.	Comments noted. The Scoping stage of the IIA involves understanding the environmental, social, and economic baseline for the plan area, which is the Greater London Authority area only.
Tarmac Trading Limited	Emphasise the importance of retaining and enhancing SSSIs with the great London area. Suggest additional emphasis is placed on habitat creation, SSSI improvement and efficient waste management within this objective. In relation to IIA objective 8, highlight that enhancement of SSSIs can come in many different forms and the wording of the prompt questions should reflect this.	Comments noted. The IIA objectives set the framework against which emerging policies in the Plan are assessed. As set out in the draft Scoping Report, the identified prompt questions are not the only considerations to be taken into account when determining likely effects, and for practical purposes the questions cannot be exhaustive.
Thames Water	The Thames Water Drainage and Wastewater Management Plan (DWMP) should be referenced in the review of plans and programmes. The revised statutory DWMP will be published in draft in Autumn 2027 with final publication expected in August 2028. IIA objectives should also include reference to ensuring sufficient water and wastewater infrastructure is in place in time to service development in line with the current NPPF and the stronger	Comments noted. The referenced document has been reviewed with corresponding updates made to the review of plans and programmes. The wider issues raised will be considered in developing the policy approaches in the draft Plan.

Consultee	Comment	GLA's response
	emphasis in the emerging NPPF. Other comments provided related to policy considerations for the new London Plan.	
Tonic Housing	While the IIA acknowledges the estimated size, socioeconomic polarisation and the issue of hate crime faced by the LGBTQ+ communities, a deeper analysis is required. The current scope does not adequately address how the London Plan will affect LGBTQ+ communities, particularly in relation to housing, place-shaping, and health. Key omissions include: • Housing and Homelessness: There is no mention of the higher risk of homelessness among LGBTQ+ people, nor the scarcity of community-led housing projects designed for them. • Venue and Service Closures: The impact of the closure of vital LGBTQ+ venues and charities is overlooked. • Health and Social Care: Although LGBTQ+ people face similar challenges to other Londoners (e.g. GP service closures, and unaffordable housing and transport for care and support workers), these issues are compounded by the limited availability of LGBTQ+ affirming health and care services. Tonic Housing recommends that the baseline data should include more data concerning the experiences of LGBTQ+ people. The baseline data primarily sourced from the English Housing Survey and the Households Below Average Income Report, unfortunately lacks information on sexual orientation and gender identity. To address this gap, suggest referring to Tonic Housing's own research Precarious Lives (2025) and Building Safer Choices (2020 and at the national level akt's No Place Like Home (2025). The current IIA framework does not explicitly mandate an assessment of the London Plan against the nine protected characteristics. This creates a	Comments noted. The referenced documents have been reviewed with corresponding updates made to the relevant sections of the IIA report. An assessment of impacts on equality forms an integrated part of the IIA framework through use of a specific assessment objective in relation to equality of opportunity (objective 6). In addition, a separate standalone EqIA focusing on potential impacts on groups with protected characteristics is included in the IIA report published alongside the draft London Plan. Proposed monitoring indicators are included in the IIA report published alongside the draft London Plan.

Consultee	Comment	GLA's response
	significant risk that the Plan's impact on specific communities will be overlooked. Currently, housing and equality are addressed through separate questions. This segmentation cannot guarantee that the equality implications of housing objectives are assessed, nor that the housing experiences of diverse communities are recognised within the equality objectives. A truly sound framework requires an integrated, cross-cutting assessment. A sound framework is incomplete without a clear commitment to ongoing review and community framework. The IIA must incorporate a detailed action plan outlining how the London Plan's impacts will be continuously assessed.	
Uber Boad by Thames Clippers	Highlight the role of the River Thames strategic transport and economic infrastructure, including river-based passenger transport as part of London's public transport network and light parcel river freight as an alternative to LGV movements. Suggest baseline data include information on passenger journey times, existing and planned pier infrastructure, evidence of LGV trop displacement from river freight operations. Broadly agree with the sustainability issues identified including congestions, air quality, carbon reduction, economic growth and resilience but the Scoping Report does not sufficiently recognise river transport as a mechanism for addressing these issues. Reasonable alternatives should be tested that assume greater use of the river for passenger and freight movement.	Comments noted. As set out in the draft Scoping Report, the identified prompt questions are not the only considerations to be taken into account when determining likely effects, and for practical purposes the questions cannot be exhaustive. The IIA objectives set the framework against which emerging policies in the Plan are assessed. The highlighted issues will be considered as part of the IIA process and more widely in developing the policy approaches in the draft Plan. The appraisal of reasonable alternatives is reported in the IIA report published alongside the draft London Plan.

Appendix C

Review of relevant plans and policies

C.1 This appendix summarises the analysis of the objectives of the key policies, plans and programmes (including legislation) that are relevant to the preparation of the new London Plan and the IIA assessment process. The key documents and their objectives have been taken into account when drafting the IIA framework.

Inclusion and safety

C.2 The **NPPF** promotes a theme of enhancing healthy and safe communities which is to be achieved by creating places which “promote social interaction (and) enable and support healthy lifestyles.” As part of this approach social, recreational and cultural facilities and services that the community needs should be provided guided by planning policies which:

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

C.3 Para 102 of the NPPF states that “Planning policies and decisions should promote public safety and take into account wider security and defence requirements by:

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

C.4 With regards to road safety, the NPPF states that “plans should create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones.”

C.5 Section 17 of the **Crime and Disorder Act 1998** requires all local authorities to exercise their functions with due regard to their likely effect on crime and disorder, and to do all they reasonably can to prevent crime and disorder. The prevention of crime and the enhancement of community safety are matters that a local authority should consider when exercising its planning functions.

C.6 The **Equality Act 2010** requires public authorities to work to eliminate discrimination and promote equality in all their activities. Under Section 149 of the Equality Act a public authority has a duty to ensure that all decisions are made in such a way as to minimise unfairness, and do not have disproportionately negative impacts on people because of their protected characteristics or background. It protects everyone against unfair treatment, on the basis of protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

C.7 The Public Sector Equality Duty came into force across Great Britain on 5 April 2011. It means that public bodies have to consider all individuals when carrying out their day-to-day work – in shaping policy, in delivering services and in relation to their own employees. It also requires that public bodies have due regard to the need to:

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

C.8 The **Mayor's Equality, Diversity and Inclusion Strategy (2018)** states that increasing the supply of genuinely affordable homes to rent or buy, and improving social housing and rental standards, will help to support groups that are particularly affected by these issues, including young people, those on low incomes and from BAME groups.

C.9 The **Mayor's Violence Against Women and Girls Strategy (2022-2025)** champions a public health approach and encourages everyone in London to play their part in ending the epidemic of violence against women and girls. The strategy sets out four priority areas for action:

- Preventing and reducing VAWG – this includes the ambition that all women and girls experience more equality and freedom in private, public and online spaces
- Supporting all victims and survivors

- Holding perpetrators to account
- Building trust and confidence

C.10 The Mayor's Police and Crime Plan 2025-2029 sets out his high-level priorities for policing, crime and community safety in London for the period 2025 to 2029. The Mayor's agenda is clear – to make London a safer city for all, by being tough on crime and tough on the complex causes of crime. The key aims of the Plan are:

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

C.11 Anti-Social Behaviour Action Plan (2023) [\[See reference 61\]](#) sets out a new approach to working with local agencies to tackle anti-social behaviour across England and Wales. The plan intends to change laws and systems to take a zero-tolerance approach and give the police and other agencies the tools they need to discourage anti-social behaviour.

Implications of the inclusion and safety policies and plans review

C.12 Plans and programmes on population and social inclusion include a range of different objectives, including tackling social exclusion, improving human rights and public participation, improving health, and ensuring every child has the chance to fulfil their potential by reducing levels of education failure, ill health, substance misuse, crime and anti-social behaviour. At the regional level, support for cultural diversity and young people are key aims. The Equality Act 2010 is the law intended to achieve equal opportunities in the workplace and in wider society.

C.13 The London Plan needs to acknowledge the importance of creating and maintaining a safe and attractive public realm which encourages people to walk and cycle, promoting a sense of place and reducing the need to travel. The London Plan needs to have policies promoting opportunities for education, skills and employment that help all to succeed in life and advance equality of opportunity. The London Plan should seek to ensure provision of goods, services, facilities, public functions, the disposal and management of premises, education and associations, meet the act's requirements.

Health

C.14 Spatial planning for health: evidence review (2017) by Public Health England (dissolved in 2021) [\[See reference 62\]](#) summarised UK evidence, focusing on neighbourhood design, housing, healthier food, natural and sustainable environment, and transport. It concluded that the built and natural environment has a profound impact on health. Health in Cities (England's Chief Medical Officer's (CMO) Annual Report 2024) [\[See reference 63\]](#) highlights that high building concentration in cities makes it challenging to access good housing, green spaces and a pollution-free environment. It also finds that population health can be improved through the built environment, including tackling the obesogenic food environment, air pollution and transport emissions. Both reports emphasise the importance of collaboration between health and planning sectors to improve public health by designing healthier built environments.

C.15 National Planning Policy (2024; amendment in 2025) [\[See reference 64\]](#): A core planning principle is to achieve healthy, inclusive and safe places. Planning policies should “take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.” It calls for planning policies to assess the needs of open space, sports and recreation facilities and opportunities for new provision and requires plan-making authorities to take a proactive approach to ensure a sufficient choice of school places is available.

C.16 Healthy Homes — a foundation for healthier and resilient communities (2025) [\[See reference 65\]](#) sets out core specification and good practice guidance to help support the delivery of healthier living environments. The guidance also covers neurodiversity, and the adoption of an ‘age-friendly’ design approach that supports residents and households to live independently throughout the different stages of their life. Beyond individual wellbeing, Healthy Homes support sustainability and affordability, helping to lower energy costs and reduce carbon emissions.

C.17 10 Year Health Plan for England (2025) [\[See reference 66\]](#) outlines 3 radical shifts: *Hospital to Community*; *Analogue to Digital*; and *Sickness to Prevention*. To support the creation of Neighbourhood Health Centres (*Hospital to Community*), the plan states the need for estates with equipment, working space and technology fit for modern health service requirement. *Sickness to Prevention*, as set out in the 10-year health plan, supports addressing wider determinants of health in the built environment, including infrastructures enabling physical activity (sports facilities, greener safer healthier transport), good quality and warmer homes, and air pollution.

C.18 Whilst the Casey Commission [\[See reference 67\]](#) on adult social care is underway and due to report in 2026, the Better Care Fund (2025-26) [\[See reference 68\]](#) aims to support people with complex health and care needs living independently at home, through strengthening neighbourhood services across health and care and use of home adaptation.

C.19 Plan for Change (2024) [\[See reference 69\]](#) sets out the Government's milestones for growing the economy as well as delivering an improved NHS, safer streets, opportunities for all, and infrastructure for clean energy.

C.20 The UK Health Security Agency Strategy (UKHSA) Strategic Plan 2023-26 [\[See reference 70\]](#) identifies UKHSA's strategic priorities in addition to delivering their core function of protecting health from threats. Strategic priority 4 focuses on health threats in the environment, including the impact of climate change on environmental hazards, and the health impact of adverse weather and air quality (indoor and outdoor).

C.21 The State of the Environment: Health, People and the Environment (2021) focuses on the relationship between human health and people's access to and connection with a clean, high quality natural environment. It presents information on England's environment, and people's exposure to environmental pollutants, flooding and climate change in relation to human health. It highlights environmental inequalities that contribute to differences in health outcomes for people in England.

C.22 Build Back Better: Our Plan for Health and Social Care (2021) [\[See reference 71\]](#) sets out the Government's new plan for health and social care. It provides an overview of how this plan will tackle the elective backlog in the NHS and put the NHS on a sustainable footing. It sets out details of the plan for adult social care in England, including a cap on social care costs and how financial assistance will work for those without substantial assets. It covers wider support that the Government will provide for the social care system, and how the Government will improve the integration of health and social care. It explains the Government's plan to introduce a new Health and Social Care Levy.

C.23 Using the Planning System to Promote Healthy Weight Environments (2020) Addendum (2021) [\[See reference 72\]](#) Provides a framework and starting point for local authorities to clearly set out in local planning guidance how best to achieve healthy weight environments based on local evidence and needs, by focusing on environments that enable healthier eating and help promote more physical activity as the default. The Addendum provides updates on the implications for planning for a healthier food environment, specifically on the hot food takeaways retail uses, and sets out recommended actions in light of changes to the Use Class Order (UCO) in England from 1 September 2020.

C.24 Public Health England, PHE Strategy 2020-25 (2019) [See reference 73]

identifies PHE's priorities upon which to focus over this five-year period to protect people and help people to live longer in good health.

C.25 Environmental Noise Regulations (2006) (as amended 2018) [See reference 74] apply to environmental noise, mainly from transport. The regulations require regular noise mapping and action planning for road, rail and aviation noise and noise in large urban areas. They also require Noise Action Plans based on the maps for road and rail noise and noise in large urban areas.

C.26 The Marmot Review: Fair Society, Healthy Lives (2010) [See reference 75]

investigated health inequalities in England and the actions to tackle them.

Subsequently, Implications for Spatial Planning (2011) showed there is:

'overwhelming evidence that poor environments contribute significantly to poor health and health inequalities' and highlights three main spatial planning policy actions (which should be applied on a universal basis, but with a scale and intensity that is proportionate to the level of disadvantage):

- 'Fully integrate the planning, transport, housing, environmental and health systems to address the social determinants of health in each locality'
- 'Prioritise policies and interventions that both reduce health inequalities and mitigate climate change by: Improving active travel; Improving good quality open and green spaces; Improving the quality of food in local areas; Improving the energy efficiency of housing'
- 'Support locally developed and evidence-based community regeneration programmes [See reference 76] that: Remove barriers to community participation and action; and Reduce social isolation'.

C.27 The Marmot Review 10 Years On (2020) [See reference 77] found that health inequalities in relation to built environment had widened, including air pollution, unhealthy high streets, prioritization of road travel and climate change. Housing cost and homelessness had increased and high levels of non-decent houses in the private rental sector remained.

C.28 The UKHSA Health Effects of Climate Change reports provides the evidential basis for assessing current and future climate risks to health (as of 2023). The report details the health effects, both direct and indirect, of the main hazards posed by the UK's changing climate, including heatwaves, flooding and drought. The impacts of climate change hazards can interact with vulnerabilities in the population, including age, socioeconomic status and ethnicity. This means that the health effects of climate change are not felt equally between different populations.

C.29 Mayor of London Health Inequalities Strategy Implementation Plan 2025–2028 [See reference 78] sets out the priority actions that the Mayor has committed to taking forward to implement the London Health Inequalities Strategy (2018) over the next three years. This includes *Healthy Places*: creating a stronger foundation through jobs, homes (affordable good quality homes, warmer homes, ending rough sleeping) and the environment (tackling air pollution, greener healthier resilient city).

C.30 Evidence Review: Housing and Health Inequalities in London (2022) [See reference 79] considers the evidence for housing interventions that support health and reduce health inequalities. Recommendations include consideration of ventilation, overheating risk, and higher energy efficiency standards in new build housing; raising standards of new homes converted from offices, housing and health colleagues to work together to develop housing offers for people with conditions requiring supported housing. The report also highlighted the shortage of health and social care workers in London that was in part driven by lack of affordable housing for key workers.

C.31 Sport for All of Us – The Mayor’s Strategy for Sport and Physical Activity (2018) is aimed at making London the most active and socially integrated city. It emphasizes community sport to connect diverse groups, improve physical and mental health, and enhance the sport workforce, supported by the £8.8m 'Sports Unites' programme. The strategy's key pillars include social integration through sport, promoting health and activity, supporting vulnerable youth, building workforce capacity, and utilizing major events to increase local participation.

Implications of the health and health inequalities policies and plans review

C.32 The Government’s new 10 Year Health Plan prioritises shifting from *Sickness to Prevention*. There is overwhelming evidence that the built environment impacts on health and health inequalities. Prevention requires addressing wider determinants of health, and those relevant to planning including housing (good quality, affordable, secure), transport (active travel, reducing emissions and air pollution), climate change (mitigation and adaptation) and built environment that enables healthy behaviours (e.g., access to healthy diet, green, open and safe space for physical activity). The other shift, *Hospital to Community* with Neighbourhood Health Centres and Services being key aims, requires spatial planning to prioritise health infrastructure and housing that supports people with complex needs to live at home.

C.33 The London Plan needs to contribute towards reduction of inequalities in health outcomes and strive to improve the overall physical and mental health and wellbeing

of the borough. It must take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs, with particular focus on areas with the poorest health outcomes.

Transport and connectivity

C.34 The **NPPF** requires that “transport issues should be considered from the earliest stages of plan-making”. The scale, location and density of development should reflect “opportunities from existing or proposed transport infrastructure”. To help reduce congestion and emissions and improve air quality and public health the planning system should focus significant development “on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.”

C.35 The NPPF also requires that planning policies support an appropriate mix of uses across an area to further help reduce the need to travel as well as the provision of high-quality walking and cycling network. While the framework promotes the use and development of sustainable transport networks it also requires that “where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development” should be identified and protected.

C.36 UK Infrastructure: A 10 Year Strategy (2025) [\[See reference 80\]](#) sets out an integrated plan to transform economic, housing and social infrastructure over the next decade. It commits to at least £725 billion in public investment, supplemented by private financing via carefully targeted public-private partnership models and a new National Wealth Fund. The strategy introduces multiyear capital budgets (initially five-year, reviewed biennially) and establishes the National Infrastructure and Service Transformation Authority (NISTA) to unify planning, improve project delivery, assure major schemes, and coordinate a transparent Infrastructure Pipeline launched in July 2025. It aims to boost growth, align infrastructure with government missions, including housing, clean energy, public services and net zero, reduce planning delays, build institutional capacity, support supply chains and skills development, and provide stability and clarity to investors.

C.37 Future of Transport: supporting rural transport innovation (2023) [\[See reference 81\]](#) shows how innovative and emerging transport technologies could address some of the major challenges in rural communities. It highlights the importance of transport to everyday life rural life and provides guiding carbonising Transport: Setting the Challenge principles for the introduction of new technologies and services.

C.38 National Highways Environmental Sustainability Strategy (2023) [See reference 82] sets out National Highways' vision for the organisation in terms of the role it can play in national prosperity and helping to protect and enhance the environment. It sets out that the organisation will deliver net zero corporate emissions by 2030, maintenance and construction emissions by 2040 and road user emissions by 2050.

C.39 The second cycling and walking investment strategy (CWIS2) (2023) [See reference 83] sets out the Government's ambition for walking and cycling in England. The strategy sets out four objectives to 2025:

- increase the percentage of short journeys in towns and cities that are walked or cycled from 41% in 2018 to 2019 to 46% in 2025.
- increase walking activity, where walking activity is measured as the total number of walking stages per person per year, to 365 stages per person per year in 2025.
- double cycling, where cycling activity is measured as the estimated total number of cycling stages made each year, from 0.8 billion stages in 2013 to 1.6 billion stages in 2025.
- increase the percentage of children aged 5 to 10 who usually walk to school from 49% in 2014 to 55% in 2025.

C.40 The Cycling and Walking Investment Strategy Report to Parliament (2022) [See reference 84] sets out the objectives and financial resources for cycling and walking infrastructure. It states the Government's long-term ambition is to make walking and cycling the natural choices for shorter journeys. It aims to double cycling by 2025, increase walking activity, increase the percentage of children that usually walk to school and reduce the number of cyclists killed or seriously injured on England's roads.

C.41 Decarbonising Transport: A Better, Greener Britain (2021) (Decarbonising Transport Plan (DTP)) [See reference 85] sets out the Government's commitments and the actions needed to decarbonise the entire transport system in the UK. It follows on from the Decarbonising Transport: Setting the Challenge report published in 2020. The DTP commits the UK to phasing out the sale of new diesel and petrol heavy goods vehicles by 2040, subject to consultation, in addition to phasing out the sale of polluting cars and vans by 2035. The DTP also sets out how the Government will improve public transport and increase support for active travel, as well as creating a net zero rail network by 2050, ensuring net zero domestic aviation emissions by 2040, and a transition to green shipping.

C.42 Decarbonising Transport: Setting the Challenge (2020) [See reference 86]

sets out the strategic priorities for the new Transport Decarbonisation Plan (TDP), published in July 2021. It sets out in detail what government, business and society will need to do to deliver the significant emissions reduction needed across all modes of transport, putting the country on a pathway to achieving carbon budgets and net zero emissions across every single mode of transport by 2050. This document acknowledges that while there have been recently published strategies to reduce greenhouse gas emissions in individual transport modes, transport as a whole sector needs to go further and more quickly, therefore the TDP takes a coordinated, cross-modal approach to deliver the transport sector's contribution to both carbon budgets and net zero.

C.43 The Mayor's Transport Strategy 2018 sets out the Mayor's transport vision and describes how Transport for London (TfL) and its partners, including the London boroughs, will deliver that vision. Road transport is the single biggest source of NO₂ in London. To address this, the Mayor introduced the world's first 24-hour ULEZ in central London on 8 April 2019 and expanded it to inner London on 25 October 2021. A supplementary proposal was added to it in November 2022. This proposal allowed TfL and the boroughs to seek to address the triple challenges of air quality, the climate emergency and traffic congestion through road user charging schemes, including by expanding the Ultra Low Emission Zone across London. On the 29 August 2023, to bring the health benefits of cleaner air to even more people the Mayor further expanded the ULEZ to cover all London boroughs.

Implications of the transport and connectivity policies and plans review

C.44 National transport policies and plans place emphasis on the modernisation and sustainability of the transport network. Specific objectives include reducing pollution and road congestion through improvements to public transport, walking and cycling networks and reducing the need to travel. National policy also focuses on the need for the transport network to support sustainable economic growth. The plans and programmes highlight that congestion and poor air quality resulting from transport are key issues. There is focus on appropriate design, location and layout of development, increasing investment in infrastructure, improving the quality and accessibility of public transport, supporting walking and cycling, and enhancing road safety.

C.45 London Plan policies should promote sustainable transport modes, walking and cycling and reduce the need to travel; reduce traffic and congestion; Improve public transport provision including better integration of modes; and enhance accessibility to key community facilities, services and jobs for all, giving regard for older and disabled

people. Policies should also recognise the importance of river/rail transport for the movement of aggregates, waste and general freight and the role this can play in reducing the carbon footprint of the sector in London.

Heritage and townscape

C.46 Relevant legislation is set out in the overarching **Town and Country Planning Act 1990**, with specific protection for buildings and areas of special architectural or historic interest within the Planning (Listed Buildings and Conservation Areas) Act 1990. **The Ancient Monuments and Archaeological Areas Act 1979** provides specific protection for scheduled monuments.

C.47 Any decisions relating to listed buildings and their settings and conservation areas must address the statutory considerations of the **Planning (Listed Buildings and Conservation Areas) Act 1990** (see in particular sections 16, 66 and 72) as well as satisfying the relevant policies within the NPPF and the Local Plan.

C.48 The **NPPF** highlights the importance of well-designed places, and that design should be inclusive. Of relevance to the approach of the planning system to the historic environment the NPPF contains an objective to contribute to the protection and enhancement of the built and historic environment. The document also sets out a strategy to seek “the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay and other threats.” The NPPF also states that planning policies and decisions should ensure that developments “are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation of change (such as increased densities).

C.49 Historic England Corporate Plan 2023-26 (2023) provides a framework for Historic England’s work as an organisation and helps maintain a collective approach to delivering on their long-term vision.

C.50 The National Design Guide (2021) sets out the Government’s priorities for well-designed places in the form of ten characteristics: context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources and lifespan.

C.51 Heritage Statement (2017) sets out how the Government will support the heritage sector and help it to protect and care for our heritage and historic environment, in order to maximise the economic and social impact of heritage and to ensure that everyone can enjoy and benefit from it.

C.52 Historic England's Advice Notes, Good Practice Advice, and Climate Change strategy provide guidance in relation to the conservation and enhancement of the historic environment, including Advice Note 8 in relation to Sustainability Appraisal and SEA. Of particular relevance, **Historic England Advice Note 4 Tall Buildings** provides advice on planning for tall buildings within the historic environment, and Advice Note 18 Adapting Historic Buildings for Energy and Carbon Efficiency provide advice on what permissions are needed for some of the common changes required to improve the energy efficiency of historic buildings.

Implications of the heritage and townscape policies and plans review

C.53 The new London Plan will need to ensure policies help build a sense of place and promote social integration. Historic environment priorities from international to local level include protecting designated resources and their settings (such as listed buildings, conservation areas, scheduled monuments, and registered parks and gardens); recognising the cultural aspects of landscape and establishing mechanisms for their protection against inappropriate development; recognising the potential value of unknown and undesignated resources; and preserving/enhancing sites and landscapes of archaeological and historic interest so that they may be enjoyed by both present and future generations.

C.54 The London Plan must ensure that historic environment policies enable the sustainable use of historic buildings, which do not harm or remove their significance. The London Plan must ensure the conservation and protection and enhancement of heritage assets including Listed Buildings, Conservation Areas and Scheduled Ancient Monuments, and their settings.

Housing

C.55 The **NPPF** (2024) includes as part of its social objective the promotion of "strong, vibrant and healthy communities" by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations. Strategic policies should set out the pattern, scale and quality of development and make sufficient provision for housing, including affordable housing). Policies should reflect "the size, type and tenure of housing needed". This policy approach is to include but should not be limited to housing requirements relating to affordable homes, families with children, older people, students, people with disabilities, service families, Travellers, those who rent their homes and people

wishing to commission the construction of their own homes. Plans must calculate housing needs in line with the standard method.

C.56 Planning and Infrastructure Bill (2025) [See reference 87] sets out the Government's plan to support housing and economic growth. The Bill aims to speed up and streamline the delivery of new homes and critical infrastructure, supporting delivery of the Government's Plan for Change milestones of building 1.5 million safe and decent homes in England and fast-tracking 150 planning decisions on major economic infrastructure projects by the end of the current Parliament. It will also support delivery of the Government's Clean Power 2030 target by ensuring that key clean energy projects are built as quickly as possible.

C.57 Renters' Rights Act (2025) [See reference 88] aims to improve renters' security and rights. The Act delivers the Government's manifesto commitment to transform the experience of private renting, including by ending Section 21 'no fault' evictions. The Act will improve the current system for both the eleven million private renters and 2.3 million landlords in England. It will give renters much greater security and stability so they can stay in their homes for longer, build lives in their communities, and avoid the risk of homelessness.

C.58 The Homes England Strategic Plan 2023 to 2028 outlines its mission to increase the delivery of affordable and good quality homes, alongside driving regeneration of towns and cities across England. The plan focuses on creating vibrant and successful places, ensuring a sufficient supply of homes, fostering a resilient housing and regeneration sector, promoting high-quality design, and enabling sustainable homes and places. It emphasizes a place-based approach, working with local leaders and partners to deliver housing-led regeneration, with a brownfield-first approach.

C.59 Planning Policy for Traveller Sites (2024) sets out the Government's planning policy for traveller sites. The Government's overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.

C.60 The Charter for Social Housing Residents: Social Housing White Paper (2020) [See reference 89] Sets out the Government's actions to ensure residents in social housing are safe, listened to, live in good quality homes and have access to redress when things go wrong.

C.61 The London Housing Strategy (2018) sets out the Mayor's plans to tackle the capital's housing crisis and his vision to provide all Londoners with a good quality home they can afford.

C.62 Technical Housing Standards – Nationally Described Space Standard

(2015) [See reference 90] sets out the Government's new nationally described space standard. The standard deals with internal space within new dwellings and sets out requirements for the Gross Internal (floor) Area of new dwellings at a defined level of occupancy, as well as floor areas and dimensions for key parts of the home.

C.63 The Mayor's Rough Sleeping Plan of Action 2025 sets the framework for how the Mayor and partners will measure and track progress towards achieving his commitment to end rough sleeping by 2030.

Implications of the housing policies and plans review

C.64 National and regional objectives for housing include improvements in longer term housing affordability; high quality housing design and streetscapes; a more stable housing market; improved choice; location of housing supply which supports accessibility and patterns of economic development; and an adequate supply of publicly funded housing for those who need it. Regional strategies focus on the affordability of housing, the quality of housing, and access to services. The housing needs of older people, people with disabilities, people experiencing homelessness, and Gypsies and Travellers are also addressed by national and regional policies. The London Plan needs to include policies on specialist, supported and housing for older people. The London Plan should set targets for sufficient pitches and plots to meet identified needs for Gypsy and Traveller accommodation.

Economic potential and employment

C.65 The **NPPF** contains an economic objective to “help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity.” It also requires that planning seeks to “create the conditions in which businesses can invest, expand and adapt” with policies required to “set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth”. Policies addressing the economy should also seek “to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment.” Of particular relevance to London is the requirement for planning policies to “recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.”

C.66 Planning policies are also required specifically to address support for the rural economy. Sustainable growth and expansion of all types of business and enterprise in rural areas should be supported, both through conversion of existing buildings and well-designed new buildings, while the diversification of the rural economy and promotion of sustainable rural tourism and leisure developments is also supported.

C.67 The NPPF also supports the role of town centres as functioning at the heart of local communities. This support is required to provide for a “positive approach to [town centres’] growth, management and adaptation.” Included within this support is a requirement to “allocate a range of suitable sites in town centres to meet the scale and type of development needed, looking at least ten years ahead.”

C.68 Planning and Infrastructure Act 2025 sets out the Government’s approach to supporting housing delivery and economic growth. The Act is designed to speed up and streamline the delivery of new homes and critical infrastructure, supporting delivery of the Government’s Plan for Change milestones including the delivery of 1.5 million safe and decent homes in England and fast-tracking 150 planning decisions on major economic infrastructure projects by the end of the current Parliament. The Act also supports delivery of the Government’s Clean Power 2030 target by ensuring that key clean energy projects are built as quickly as possible.

C.69 UK Infrastructure: A 10 Year Strategy (2025) sets out an integrated plan to transform economic, housing and social infrastructure over the next decade. It commits to at least £725 billion in public investment, supplemented by private financing via carefully targeted public-private partnership models and a new National Wealth Fund. The strategy introduces multiyear capital budgets (initially five-year, reviewed biennially) and establishes the National Infrastructure and Service Transformation Authority (NISTA) to unify planning, improve project delivery, assure major schemes, and coordinate a transparent Infrastructure Pipeline launched in July 2025.

C.70 The UK’s Modern Industrial Strategy (2025) outlines a 10-year plan to boost business investment and elevate the UK’s performance in eight designated growth driving sectors: advanced manufacturing; clean energy industries; creative industries; defence; digital and technologies; financial services; life sciences; and professional & business services.

C.71 UK Infrastructure Pipeline (2025) provides industry and investors with up-to-date information on public and privately delivered infrastructure projects in construction, under development or in pre-project stages where a clear strategic need has been prioritised by the UK Government or in business plans.

C.72 The Plan for Change (2024) outlines the UK Government's framework for long-term policy delivery across five priority areas: economic growth, healthcare, public safety, opportunity, and clean energy. It sets out specific targets within this Parliament, underpinned by aims to ensure economic stability, reform public services, and implement a more mission-focused approach to governance.

C.73 Invest 2035: The UK's Modern Industrial Strategy (2024) is the Government's credible, 10-year plan to deliver the certainty and stability businesses need to invest in the high growth sectors. The Strategy will focus on tackling barriers to growth, creating the right conditions for increased investment, high-quality jobs and ensuring tangible impact in communities across the UK.

C.74 Agricultural Transition Plan 2021 to 2024 (update 2024) aims to drive competitiveness, increase productivity, reduce carbon emissions, and generate fairer returns across the agricultural industry. The Transition Plan introduces several new schemes to improve the environment, animal health and welfare, and farm resilience and productivity (e.g., grants will be available for sustainable farming practices, creating habitats for nature recovery and making landscape-scale changes such as establishing new woodland and other ecosystem services).

C.75 Agriculture Act (2020) sets out how farmers and land managers in England will be rewarded in the future with public money for "public goods" – such as better air and water quality, thriving wildlife, soil health, or measures to reduce flooding and tackle the effects of climate change, under the Environmental Land Management Scheme. The Act will help farmers to stay competitive, increase productivity, invest in new technology and seek a fairer return from the marketplace. Agricultural Transition Plan 2021 to 2024.

C.76 The LEP Network Response to the Industrial Strategy Green Paper Consultation (2017) seeks to ensure that all relevant local action and investment is used in a way that maximises the impact it has across the Government's strategy. Consultation responses set out how the 38 Local Enterprise Partnerships will work with Government using existing and additional resources to develop and implement a long-term Industrial Strategy.

C.77 The London Growth Plan (2025) is the latest strategic document sets the framework for sustainable, equitable economic development of the capital over the next 10 years. It sets out four targets:

- A 2% rise in productivity per year, which – if achieved – would expand London's economy by an estimated £107bn in 2035, increasing pre-tax income for Londoners by an average £11,000 and contribute an additional £27.5bn to the Treasury.

- Raise earnings for those with the lowest incomes, specifically increasing real household weekly income (after housing costs) of the lowest “20% of Londoners by 20% by 2035”.
- The plan recommits to London’s target to be net-zero by 2030, with the promise to accelerating plans to meet this major milestone.
- Increase London’s standing as a global city, growing London’s services exports by an average of 6% per year.

Implications of the economic potential and employment policies and plans review

C.78 The improvement and maintenance of high and stable levels of economic growth and employment are key aims of the national strategies. Other objectives include improvements to the education system to increase the skill levels of both children and adults, and improved productivity and innovation, particularly with regard to technology. At a regional level, emphasis is placed on improvements to the cultural and visitor economy; inward investment; and the use of Information and Communications Technology (ICT) to improve efficiency and skills. The London Plan policies will need to encourage economic growth across the whole plan area and take account of changing economic conditions and requirements to support local businesses and enterprises.

Air quality

C.79 Air quality strategy for England (2023) sets out local authorities’ powers and responsibilities as well as the actions that Defra expects local authorities to take in support of the Government’s long-term air quality goals, including new PM_{2.5} targets.

C.80 The Industrial Decarbonisation Strategy (2021) aims to support existing industry to decarbonise and encourage the growth of new, low carbon industries to protect and create skilled jobs and businesses in the UK encouraging long-term investment in home-grown decarbonisation technology. The strategy sets out the Government’s vision for building a competitive, greener future for the manufacturing and construction sector and is part of the Government’s path to net zero by 2050.

C.81 Clean Air Strategy (2019) Sets out the comprehensive action that is required from across all parts of government and society to meet these goals. This will be underpinned by new England-wide powers to control major sources of air pollution, in line with the risk they pose to public health and the environment, plus new local powers to take action in areas with an air pollution problem. These will support the

creation of Clean Air Zones to lower emissions from all sources of air pollution, backed up with clear enforcement mechanisms. The UK has set stringent targets to cut emissions by 2020 and 2030.

C.82 The UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations

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

C.83 Nitrate Pollution Prevention Regulations (2016) provides for the designation of land as nitrate vulnerable zones and imposes annual limits on the amount of nitrogen from organic manure that may be applied or spread in a holding in a nitrate vulnerable zone. The Regulations also specify the amount of nitrogen to be spread on a crop and how, where and when to spread nitrogen fertiliser, and how it should be stored. It also establishes closed periods during which the spreading of nitrogen fertiliser is prohibited.

C.84 Air Quality Standards Regulations (2016) set out limits on concentrations of outdoor air pollutants that impact public health, most notably particulate matter (PM₁₀ and PM_{2.5}) and nitrogen dioxide (NO₂). It also sets out the procedure and requirements for the designation of Air Quality Management Areas (AQMA's).

C.85 Mayor's Transport Strategy 2018 Mayor of London sets out the Mayor's transport vision and describes how Transport for London (TfL) and its partners, including the London boroughs, will deliver that vision. Road transport is the single biggest source of NO₂ in London. To address this, the Mayor introduced the world's first 24-hour ULEZ in central London on 8 April 2019 and expanded it to inner London on 25 October 2021. A supplementary proposal was added to it in November 2022. This proposal allowed TfL and the boroughs to seek to address the triple challenges of air quality, the climate emergency and traffic congestion through road user charging schemes, including by expanding the Ultra Low Emission Zone across London. On the 29 August 2023, to bring the health benefits of cleaner air to even more people the Mayor further expanded the ULEZ to cover all London boroughs.

C.86 London Environment Strategy 2018 commits to achieving the WHO (2005) annual mean AQG of 10 µg/m³ of PM_{2.5} by 2030, a full decade before the new UK legal limits. However, the Mayor is committed to achieving the stricter 2021 WHO AQG of 5µg/m³ as soon as possible and recognises that more needs to be done to do so.

Implications of the air quality policies and plan review

C.87 A number of objectives have been established in relation to air quality. This includes the setting of targets for reducing emissions of specific pollutants to minimise negative impacts on health and the environment. At the sub-regional and local level emphasis is placed on reducing emissions of nitrogen dioxide (NO₂) from the transport sector. The London Plan must acknowledge the importance of air quality to the lives of people who live, work and play in London, as well as the environment. It must also demonstrate possible measures to be put in place to reduce the harmful effects of air pollution on human health and the environment.

Biodiversity and natural environment

C.88 A requirement of the **NPPF's** environmental objective is that the planning system should contribute to protecting and enhancing the natural environment including helping to improve biodiversity and using natural resources prudently. In support of this aim the framework states that plans should “identify and map safeguard components of local wildlife-rich habitats and wider ecological networks” and should also “promote the conservation, restoration and recreation of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.” The framework requires that plans should take a strategic approach in terms of “maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries”.

C.89 The Environment Act (2021) [See reference 91] sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. The Environment Act will deliver:

- Long-term targets to improve air quality biodiversity, water, and waste reduction and resource efficiency.
- A target on ambient PM_{2.5} concentrations.
- A target to halt the decline of nature by 2030.
- Environmental Improvement Plans, including interim targets.
- A cycle of environmental monitoring and reporting.
- Environmental Principles embedded in domestic policy making.
Office for Environmental Protection to uphold environmental law.

- Strengthened biodiversity duty. Both onsite and offsite enhancements must be maintained for at least 30 years after completion of a development.
- Biodiversity net gain to ensure developments deliver at least 10% increase in biodiversity.
- Local Nature Recovery Strategies to support a Nature Recovery Network.
- Duty upon Local Authorities to consult on street tree felling.
- Strengthen woodland protection enforcement measures.
- Conservation Covenants.
- Protected Site Strategies and Species Conservation Strategies to support the design and delivery of strategic approaches to deliver better outcomes for nature.
- Prohibit larger UK businesses from using commodities associated with wide-scale deforestation.
- Requires regulated businesses to establish a system of due diligence for each regulated commodity used in their supply chain, requires regulated businesses to report on their due diligence, introduces a due diligence enforcement system.

C.90 Environmental Improvement Plan (2025) [See reference 92] Long-term delivery plan setting out 10 goals, commitments and actions in relation to the natural environment. The plan sets out how the Government will work with landowners, communities and businesses to deliver each goal for improving the environment, matched with interim targets to measure progress. Taking these actions will help to restore nature, reduce environmental pollution, and increase the prosperity of the country. The overarching goal of the plan is achieving “restored nature”, including progress towards the commitment to protect 30% of UK land and sea for nature by 2030, alongside improving the condition and resilience of nature assets.

C.91 Green Infrastructure Framework and associated 15 Green Infrastructure Principles (2023) [See reference 93] contains the ‘15-minute neighbourhood’ concept is encouraged as part of the new green infrastructure (GI) standards set out in the framework. Development should be designed to meet the 15 Green Infrastructure Principles. The GI Standards can be used to inform the quality, quantity and type of green infrastructure to be provided.

C.92 Working with Nature (2022) [See reference 94] discusses the importance of nature in providing ecosystem services and presents recent and historical trends in biodiversity. It outlines some of the main pressures affecting England’s habitats,

wildlife and ecosystems: land use; climate change; pollution; invasive non-native species; and hydrological change.

C.93 Establishing the Best Available Techniques for the UK (UK BAT) (2022)

[See reference 95] sets out a new framework that aims to improve industrial emissions and protect the environment through the introduction of a UK BAT regime. It aims to set up a new structure of governance with a new independent body in the form of Standards Council and the Regulators Group, consisting of government officials and expert regulators from all UK nations. It aims to also establish a new UK Air Quality Governance Group to oversee the work of the Standards Council and the delivery of the requirements under this new framework.

C.94 The Environmental Improvement Plan (2025) is the Government's long-term delivery plan for driving improvements to the natural environment and enjoyment of it. The EIP is a statutory plan that applies across government and sits alongside other provisions in the Environment Act 2021. It includes ten long-term goals for the natural environment, covering restored nature, air, water, chemicals and pesticides, waste, resources, climate change, environmental hazards, biosecurity, and access to nature. The goals are supported by 91 commitments, giving policymakers, businesses, and communities a clear roadmap for environmental action and investment over the next five years.

C.95 The Conservation of Habitats and Species (Amendment) (EU Exit)

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

C.96 An Approach to Landscape Sensitivity Assessment (2019) Assists in informing judgements and decisions concerning the planning and management of change. It helps inform good practice, generates further continued discussion and encourages methods, techniques and skills relating to landscape sensitivity assessment.

C.97 The London Environment Strategy 2018 brings together approaches to every aspect of London's environment, integrating the following areas:

- air quality
- green infrastructure
- climate change mitigation and energy
- waste

- adapting to climate change
- ambient noise
- low carbon circular economy.

C.98 The London Local Nature Recovery Strategy (2026) identifies the priorities for nature in London and the actions needed to achieve these. It supports and builds on the London Environment Strategy, helping to achieve the objective of conserving and enhancing wildlife and natural habitats. It also provides important data and maps to inform the London Plan. The LNRS forms a core part of the London Green Infrastructure Framework (LGIF) – the LGIF is the overarching framework and evidence base for London’s green infrastructure and provided spatial data across the full range of benefits that green infrastructure provides. The London LNRS sets out six principles and 30 biodiversity priorities. The six principles are:

- Help people enjoy nature: make it easier for all Londoners to enjoy, act for, and connect with nature, while looking after the most sensitive natural areas.
- Bigger, better, more connected, and more habitats: create, improve, and connect a mix of habitats to help nature thrive.
- Boost wildlife populations: increase species abundance, with a focus on native and threatened species.
- Help pollinators and minibeasts thrive: support a wide variety of invertebrates that live on land and in water, including pollinators such as wild bees, butterflies, and other invertebrates.
- Support healthy soils: restore and minimise disturbance and erosion to soils and fungi to support biodiversity.
- Protect wildlife from invasive species and disease: reduce and control invasive species to protect and improve valuable habitats and species.

C.99 The biodiversity priorities set out specific habitats and other areas in London where nature needs support. The priorities and measures (grouped into similar habitats) are summarised as:

- Urban nature: improve nature in built-up areas, for example by putting nest boxes on buildings and making parks better for wildlife.
- Rewilding and reintroduction: create large areas for nature and bring back animals and plants that used to live in London.
- Green corridors: connect nature spaces across London to help wildlife move through the city.

- Trees and woodland: plant more trees and look after our woodlands, orchards, and parklands.
- Waterbodies and waterways: help nature thrive in rivers, streams, canals, ponds, and lakes.
- Wetland: improve other 'wet' habitats, like marshland and reedbeds.
- Grassland, heathland, scrub, and farmland: make more of, and look after, nature in grassy and shrubby areas, and on farms.
- Micro-habitats: increase areas of deadwood and sand. These are important for wildlife like beetles and bees.

C.100 Environmental Damage (Prevention and Remediation) Regulations (2015)

are wide-ranging government regulations that can potentially apply to many businesses. The regulations oblige those who create environmental damage, whether by water pollution, adversely affecting protected species or sites of special scientific interest (SSSIs), or by land pollution that causes risks to human health, to not only cease the damage, but also to implement a wide variety of remedial measures to restore affected areas.

C.101 Defra Right of Way Circular (01/09) (2011) advice to local authorities on recording, managing and maintaining, protecting and changing public rights of way.

C.102 Countryside and Rights of Way Act (2010) is an Act of Parliament to make new provision for public access to the countryside.

C.103 Natural Environment and Rural Communities Act (2006) places a duty on public bodies to conserve and enhance biodiversity.

C.104 Wildlife and Countryside Act (1981) (as amended) enacted primarily to implement the Birds Directive and Bern Convention in Great Britain. The Act received royal assent on 30 October 1981 and was brought into force in incremental steps. It is supplemented by the Wildlife and Countryside (Service of Notices) Act 1985, which relates to notices served under the 1981 Act.

C.105 National Parks and Access to the Countryside Act (1949) is an Act of Parliament to make provision for National Parks and the establishment of a National Parks Commission; to confer on the Nature Conservancy and local authorities' powers for the establishment and maintenance of nature reserves; to make further provision for the recording, creation, maintenance and improvement of public paths and for securing access to open country.

Implications of the biodiversity and natural environment policies and plans review

C.106 The objectives of policies and plans at all levels focus on the conservation of biological diversity (including a reduction in the current rate of biodiversity loss), and the protection and monitoring of endangered and vulnerable species and habitats. They also emphasise the ecological importance of geodiversity. The integration of biodiversity considerations into all environmental and socio-economic planning is strongly advocated. The London LNRS has a critical role in terms of:

- identifying priority locations for nature recovery
- Ensuring ecological connectivity
- Aligning spatial development with biodiversity enhancement opportunities

C.107 Biodiversity needs to become part of development policy on sustainable communities, urban green space and the built environment, and this should be reflected in policies to promote biodiversity conservation and enhancement, opportunities for local planning, design and operation to integrate biodiversity and the network of green spaces and green infrastructure to provide a range of sustainability benefits, i.e. healthy living, improving air and water quality, cooling the urban environment, service resilience, enhancing biodiversity and ecological resilience. This could include both enhancing existing habitats and providing new areas for biodiversity as opportunities arise. The London Plan needs to take the four critical themes into account: conservation; creation; connection; and celebration. The Plan policies will need to be written in accordance with the objectives and requirements set out in the 25 Year Plan and the Environment Act 2021 be informed by the London LNRS.

Climate change

C.108 The **Climate Change Act (2008)** and **Climate Change Act 2009 (2050 Target Amendment) Order (2019)** sets targets for UK greenhouse gas emission reductions of at least 100% by 2050, against a 1990 baseline (this was previously 80% but was updated to a net zero target in June 2019).

C.109 The **Planning and Compulsory Purchase Act 2004** requires that “Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority’s area contribute to the mitigation of, and adaptation to, climate change.”

C.110 The NPPF (2024) contains as part of its environmental objective a requirement to mitigate and adapt to climate change, “including moving to a low carbon economy”. It states that “the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience...and support renewable and low carbon energy and associated infrastructure...Plans should take a proactive approach to mitigating and adapting to climate change...FN: In line with the objectives and provisions of the Climate Change Act 2008.”

C.111 The document also states that the “planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change.” To achieve these aims new development should be planned to ensure appropriate adaptation measures are included (including green infrastructure) and should be designed, located and orientated as to help to reduce greenhouse gas emissions.

C.112 The NPPF requires plans to take a proactive approach in adapting to climate change, stating that “Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure”. As mentioned above, local planning authorities should take full account of overheating from rising temperatures. As temperatures increase, there will be more demand for energy used for cooling, and so policies in the Plan should include design measures that minimise overheating and energy demand for cooling.

C.113 The NPPF also requires that development is directed away from areas which are at highest existing or future risk of flooding. Where development is required in such areas, the “development should be made safe for its lifetime without increasing flood risk elsewhere.” In relation to coastal change in England planning policies and decisions should take account of the UK Marine Policy Statement and marine plans. Furthermore, plans should “reduce risk from coastal change by avoiding inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast”.

C.114 Clean Energy Industries Sector Plan (2025) is the UK government’s strategic initiative, under the Modern Industrial Strategy, to position the nation as a global leader in frontier clean energy technologies by 2035. The plan sets out an ambition to double investment across key clean energy industries, such as wind (onshore, offshore, floating), nuclear fission, fusion, hydrogen, carbon capture, usage and storage (CCUS), greenhouse gas removals, and heat pumps, to over £30 billion

per year, while continuing to support other vital technologies like solar, long-duration energy storage and bioenergy. It aims to catalyse private sector engagement by deploying targeted public investment, including more than £8.3 billion through Great British Energy and Great British Energy-Nuclear up to 2029 and a Clean Energy Supply Chain Fund, and by reducing barriers to investment, thereby providing industry certainty and encouraging deployment and innovation.

C.115 Hydrogen Update to the Market (2025) provides a detailed overview of the UK's hydrogen policy progress UK's and outlines forthcoming opportunities as part of the Government's Clean Energy Superpower and Growth Missions. Significant investment commitments include over £500 million allocated toward developing the first regional hydrogen transport and storage network, aiming for operation by 2031, supported by a forthcoming Hydrogen to Power Business Model in 2026.

C.116 Onshore Wind Strategy (2025) presents the country's first dedicated strategy to accelerate onshore wind deployment as a key component of its Clean Power 2030 mission. The strategy sets a target of deploying 27-29 GW of onshore wind capacity across Great Britain by 2030, significantly increasing from existing capacity of over 16 GW, and backed by over 40 actions to tackle barriers such as planning delays, aviation and defence conflicts, grid access, and community engagement.

C.117 Carbon Budget and Growth Delivery Plan (2025) sets out how the Government will meet its statutory carbon budgets and secure the benefits of this transition for people and businesses. The plan sets out a package of quantified and unquantified proposals and policies and associated timescales and delivery risks. This includes actions around energy security and lower bills, such as incentivising new clean electricity generating projects in Great Britain.

C.118 Environmental Improvement Plan (2025) is a long-term delivery plan setting out 10 goals, commitments and actions in relation to the natural environment. The plan sets out how the Government will work with landowners, communities and businesses to deliver each goal for improving the environment, matched with interim targets to measure progress. Taking these actions will help to restore nature, reduce environmental pollution, and increase the prosperity of the country. The overarching goal of the plan is achieving "restored nature", including progress towards the commitment to protect 30% of UK land and sea for nature by 2030, alongside improving the condition and resilience of nature assets.

C.119 Clean Power 2030 Action Plan: A New Era of Clean Electricity (2024) sets out a pathway to a clean power system by 2030, outlining what the Government will do to support and accelerate delivery of the new infrastructure. It seeks to address the following challenges:

- To maintain a secure and affordable energy supply in an increasingly unstable world.
- To create new industries and investments around the country.
- To protect the environment, we live in from the most damaging effects of climate change.

C.120 National Adaptation Programme and the Fourth Strategy for Climate Adaptation Reporting (2023) sets out a series of actions for the following sectors over a 5-year period:

- Infrastructure - new commitments on resilience standards, investment in water quality and a new transport adaptation strategy
- Nature environment - Local Nature Recovery Strategies, incorporate climate change adaptation into the design of Environmental Land Management schemes and Nature Recovery Projects
- Health, communities and the built environment - investment in flood and coastal erosion schemes, Adverse Weather & Health Plan, update the National Planning Policy Framework to support both adaptation and mitigation efforts and provide local climate projections
- Business and industry - Green Finance Strategy 2023, new strategy on supply chains and imports and survey business readiness for climate impacts.
- International impacts – the Government will adapt and build resilience in vulnerable communities to climate related disasters and continue to drive international action and consensus in negotiations on climate adaptation.

C.121 Biomass Strategy (2023) builds on the 2021 Biomass policy statement and the Powering up Britain strategy which emphasised the important role that biomass will play in Britain's fully decarbonised power system by 2035, subject to security of supply. It sets out steps government intends to take to strengthen biomass sustainability and the opportunities for the use of sustainable biomass across multiple sectors of the economy in support of achieving the UK's net zero target.

C.122 Energy Security Plan (2023) sets out the steps that the Government is taking to improve the UK's energy system resilience, particularly in the current geopolitical context. Key commitments include:

- Looking at the role gas storage and other sources of flexibility can play in gas security.
- Delivery of energy efficiency upgrades through the Great British Insulation Scheme.

- Extension of the Boiler Upgrade Scheme to 2028.

C.123 Defence Operational Energy Strategy (2023) sets out how the Ministry of Defence (MOD) will respond to the global energy transition. The aims of the strategy are to adopt a new approach to managing fuel and energy, leading to a cultural shift in how the MOD makes its operational energy decisions.

C.124 Net Zero Growth Plan (2023) outlines the Government's plans to reach net zero and unlock the financial benefits that this can bring. Key commitments include:

- Responding to the consultation on a revised Waste Prevention Programme for England alongside the new programme 'Maximising Resources, Minimising Waste'.
- Providing up to £20 billion of funding for early deployment of CCUS to unlock private investment and jobs.
- Consulting on an ambitious Zero Emission Vehicle mandate; publishing the Low Carbon Fuels Strategy in 2023; and legislating to include recycled carbon and nuclear derived fuels in renewables transport fuel schemes.

C.125 Net zero government emissions: UK roadmap (2023) outlines the journey to central government net zero emissions. It covers the policies and interim targets around government buildings and transport, procurement and skills.

C.126 The Industrial Decarbonisation Strategy (2021) aims to support existing industry to decarbonise and encourage the growth of new, low carbon industries to protect and create skilled jobs and businesses in the UK encouraging long-term investment in home-grown decarbonisation technology. The strategy sets out the Government's vision for building a competitive, greener future for the manufacturing and construction sector and is part of the Government's path to net zero by 2050.

C.127 The Heat and Buildings Strategy (2021) sets out the Government's plan to significantly cut carbon emissions from the UK's 30 million homes and workplaces. This strategy aims to provide a clear direction of travel for the 2020s, set out the strategic decisions that need to be taken this decade, and demonstrate how the UK plans to meet its carbon targets and remain on track for net zero by 2050.

C.128 Energy Performance of Buildings Regulations (2021) seeks to improve the energy efficiency of buildings, reducing their carbon emissions and lessening the impact of climate change. The Regulations require the adoption of a standard methodology for calculating energy performance and minimum requirements for energy performance, reported through Energy Performance Certificates and Display Energy Certificates.

C.129 National Infrastructure Strategy: Fairer, Faster, Greener (2020) sets out plans to transform UK infrastructure in order to level up the country, strengthen the Union and achieve net zero emissions by 2050. This will be enabled by clear support for private investment and through a comprehensive set of reforms to the way infrastructure is delivered.

C.130 Sixth Carbon Budget (Climate Change Committee, 2020) based on an extensive programme of analysis, consultation and consideration by the Committee and its staff, building on the evidence published last year for our Net Zero advice. The recommended pathway requires a 78% reduction in UK territorial emissions between 1990 and 2035. In effect, bringing forward the UK's previous 80% target by nearly 15 years.

C.131 Net Zero – The UK's Contribution to Stopping Global Warming (2019) responds to a request from the Governments of the UK, Wales and Scotland, asking the Committee to reassess the UK's long-term emissions targets. The new emissions scenarios in the document draw on ten new research projects, three expert advisory groups, and reviews of the work of the IPCC and others. The report's key findings are that:

- The Committee on Climate Change recommends a new emissions target for the UK: net-zero greenhouse gases by 2050.
- In Scotland, we recommend a net-zero date of 2045, reflecting Scotland's greater relative capacity to remove emissions than the UK as a whole.
- In Wales, we recommend a 95% reduction in greenhouse gases by 2050.

C.132 The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting (2018) sets out visions for the following sectors:

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

C.133 The Flood and Water Management Act 2010 and The Flood and Water Regulations (2019) sets out measures to ensure that risk from all sources of flooding is managed more effectively. This includes incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; rolling back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).

C.134 Flood and Coastal Erosion Risk Management: Policy Statement (2020) sets out the Government's long-term ambition to create a nation more resilient to future flood and coastal erosion risk, and in doing so, reduce the risk of harm to people, the environment and the economy. The Policy Statement sets out five policy areas which will drive this ambition. These are:

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

C.135 The Energy Efficiency Strategy (2012) aims to realise the wider energy efficiency potential that is available in the UK economy by maximising the potential of existing dwellings by implementing 21st century energy management initiatives on 19th century homes.

C.136 Planning and Energy Act (2008) enables local planning authorities to set requirements for carbon reduction and renewable energy provision. It should be noted that while the Housing Standards Review proposed to repeal some of these provisions, at the time of writing there have been no amendments to the Planning and Energy Act.

C.137 The Thames Estuary Plan (TE2100) was developed by the EA and approved by Government in November 2021. It provides strategic direction for managing flood risk in the Thames Estuary to the end of the century. TE2100 is an adaptive plan which considers different long-term options for managing tidal flood risk depending on changes in several factors that determine the risk, including sea-level rise. It (last updated in 2023) sets out the link between the plan's high-level aims and objectives and what needs to be done to realise them. There are nine strategic objectives within the plan:

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

C.138 Underpinning the objectives are two strategic enablers:

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

C.139 The London Surface Water Strategy (2025-30) is a city-wide, coordinated response to the growing threat of surface water flooding across Greater London. Developed by the Flood Ready London partnership, this Strategy sets out a comprehensive plan to enhance the capital's resilience to intense rainfall and urban drainage challenges through systemic, hydrology-led, and community-focused action.

C.140 Thames River Basin District Flood Risk Management Plan 2021 to 2027 drives catchment-based delivery in the Thames RBD that offers multiple benefits to communities and the environment. This catchment-based approach is a key part of the Environment Agency's ambition to meet net zero carbon, along with low carbon

innovation and carbon offsetting. It is also integral to achieving the Environment Agency's biodiversity net gain targets which support the ambitions of the Government's '25 Year Environment Plan'. The next 5-year cycle of the plan will start in 2027.

C.141 The Thames Water Drainage and Wastewater Management Plan (DWMP23) is a 25-year strategic plan to deliver a resilient and sustainable wastewater service. The DWMP sets out how wastewater systems, and the drainage networks that serve them, are to be extended, improved, and maintained to ensure they are resilient against future pressures such as climate change and population growth. The revised statutory DWMP will be published in draft in Autumn 2027 with final publication expected in August 2028.

C.142 The Thames Water Drainage and Wastewater Management Plan (DWMP23) is a 25-year strategic plan to deliver a resilient and sustainable wastewater service. The DWMP sets out how wastewater systems, and the drainage networks that serve them, are to be extended, improved, and maintained to ensure they are resilient against future pressures such as climate change and population growth. The revised statutory DWMP will be published in draft in Autumn 2027 with final publication expected in August 2028.

C.143 London net zero 2030: An updated pathway responds to the analysis. It explains the key issues, benefits and challenges of the four pathways and why the Accelerated Green pathway is the preferred option for London.

C.144 The London Climate Resilience Review July 2024 provides an assessment of London's climate resilience and makes 50 recommendations for action to guide London's preparations for more frequent and intense climate impacts.

Implications of the climate change policies and plans review

C.145 Legislation and national planning policy require to drive reductions in greenhouse gas emissions and promote sustainable development that is adapted to the expected range of climate impacts. New development should be designed to adapt to climate change for the increased likelihood of extreme weather events, overheating as a result of temperature rise, as well as current infrastructure improved to be resilient to climate change. The London Plan policies should contribute to meeting the objectives set out within the Climate Change Act 2008.

C.146 The London Plan should encourage reductions in CO₂ emissions in line with London net zero by 2030 and promote sustainable growth. The policies should promote energy efficient design for business premises and private houses,

encourage the use of low carbon technologies and the development of renewable energy facilities, both as standalone facilities and as part of wider developments. There is a need to encourage the use of renewable energy sources and low carbon technology in the London Plan. There is also a need for the Plan to include policies to assist in directing development to locations at least risk of flooding and help to reduce overall flood risk.

Geology and soils

C.147 The **NPPF** states that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing sites of geological value and soils and recognising the economic and other benefits of the best and most versatile agricultural land. Policies should also prevent new and existing development from “contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution.” The document also requires that strategic policies should seek to make the most effective use of land in meeting local requirements making as much use as possible of previously developed or ‘brownfield’ land. Furthermore, policies should “support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land”.

C.148 Safeguarding our Soils – A Strategy for England (2009) sets out how England’s soils will be managed sustainably. It highlights those areas which Defra will prioritise and focus attention in tackling degradation threats, including better protection for agricultural soils; protecting and enhancing stores of soil carbon; building the resilience of soils to a changing climate; preventing soil pollution; effective soil protection during construction and dealing with contaminated land.

Implications of the soils and geodiversity plans and policies review

C.149 The London Plan needs to focus on prevention and remediation of environmental damage, including land contamination. There is a need to increase efforts to reduce soil degradation and remediate contaminated sites as well as protect the best quality agricultural land.

Materials and waste

C.150 National Planning Policy for Waste (2014) Sets out detailed waste planning policies and places responsibility on waste planning authorities to ensure that waste

management is considered alongside other spatial planning concerns such as housing and transport; recognising the positive contribution waste management can make to developing sustainable communities. This includes preparing Local Plans which identify opportunities to meet the needs of their area.

C.151 The Waste Prevention Programme for England: Maximising Resources, Minimising Waste (2023) [See reference 96] sets out government's priorities for managing resources and waste, in line with the resources and waste strategy for England.

C.152 Waste Management Plan for England (2021) sets out the measures for England to work towards a zero-waste economy.

C.153 The Waste (Circular Economy) (Amendment) Regulations (2020) seek to prevent waste generation and to monitor and assess the implementation of measures included in waste prevention programmes. They set out requirements to justify not separating waste streams close to source for re-use, recycling or other recovery operations, prohibit incineration and landfilling of waste unless such treatment process represent the best environmental outcome in accordance with the waste hierarchy. The Regulations set out when waste management plans and in waste prevention programmes are required. The Regulations focus on the circular economy as a means for businesses to maximise the value of waste and waste treatment.

C.154 Our Waste, Our Resources: A strategy for England (2018) aims to increase resource productivity and eliminate avoidable waste by 2050. The Strategy sets out key targets which include: a 50% recycling rate for household waste by 2020, a 75% recycling rate for packaging by 2030, 65% recycling rate for municipal solid waste by 2035 and municipal waste to landfill 10% or less by 2035.

Implications of the materials and waste policies and plans review

C.155 Plans and programmes at all levels seek to promote the 'waste hierarchy'. This seeks to prioritise waste management in the following order: reduction; reuse; recycling and composting; energy recovery; and disposal. National level plans and programmes seek to protect minerals resources and promote appropriate after uses for minerals workings. The London Plan should apply principles of circular economy when aiming for waste reduction, reuse, re-manufacturing and recycling in all construction and operational practices and should seek to promote sustainable waste management within the London Plan.

Water resources and quality

C.156 National water policies are primarily driven by the aims of the **Water Environment (Water Framework Directive) Regulations 2017** which requires prevention of deterioration of all water bodies (groundwater and surface waters) and to improve them with the aim to meet 'good status' or 'good ecological potential' by 2027. It establishes a statutory framework for the protection of groundwater and inland surface water, estuaries, and coastal waters. Key objectives include improving the quality of rivers and other water bodies to 'good ecological status'; considering flood risk at all stages of the plan and development process in order to reduce future damage to property and loss of life; and incorporating water efficiency measures into new developments.

C.157 In terms of planning policy, **NPPF** requires the planning system to contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability. National and regional strategies also have a focus on maintaining and protecting the availability of water.

C.158 The National Framework for Water Resources 2025: Water for Growth, Nature and a Resilient Future (2025) provides a strategic blueprint for managing England's long term water needs. It emphasises the twin imperatives of securing resilient water supplies to support housing, energy, food production, economic growth, and a thriving natural environment, while safeguarding ecosystems through sustainable abstraction and nature-based solutions. The Framework projects significant pressures on water resources driven by climate change, population growth, and emerging industrial demands, forecasting a shortfall of up to 5 billion litres per day by 2055. It calls for integrated, multi sector planning across national, regional, and local levels, combining demand management (such as leakage reduction and efficiency improvements) with development of new infrastructure and environmental enhancements.

C.159 Drought: how it is managed in England (2025) details how drought affects England and how the Environment Agency works with government, water companies and others to manage the effects on people, business and the environment. It aims to ensure consistency in the way we co-ordinate drought management across England. It sets out:

- the impacts of drought in England
- who is involved in planning, managing and responding and how we work together

- the actions we and others take to effectively manage droughts
- how we report on drought and communicate with others
- our role in recovery and learning from drought events

C.160 Plan for Water: Our Integrated Plan for Delivering Clean and Plentiful Water (2023) sets out actions to transform the management of the water system, deliver cleaner water for nature and people, and secure a plentiful water supply. The plan also sets out measures to address sources of pollution, and boost water supplies through more investment, tighter regulation, and more effective enforcement.

C.161 National Flood and Coastal Erosion Risk Management Strategy for England (2022) sets out the national framework for managing the risk of flooding and coastal erosion. It sets out the roles for risk management authorities and communities to help them understand their responsibilities. The strategic aims and objectives of the Strategy are:

- climate resilient places: working with partners to bolster resilience to flooding and coastal change across the nation, both now and in the future in the face of climate change;
- today's growth and infrastructure resilient in tomorrow's climate: making the right investment and planning decisions to secure sustainable growth and environmental improvements, as well as infrastructure resilient to flooding and coastal change; and
- a nation ready to respond and adapt to flooding and coastal change: ensuring local people understand their risk to flooding and coastal change and know their responsibilities and how to act.

C.162 National Chalk Streams Strategy (2021) is built around the "trinity of ecological health": water quantity, water quality and habitat quality and included 30+ recommendations to Defra, the Environment Agency, Natural England, the water companies, NGOs and stakeholders.

C.163 Managing Water Abstraction (2021) is the overarching document for managing water resources in England and Wales and links together the abstraction licensing strategies.

C.164 Meeting our future water needs: a national framework for water resources (2020) set the strategic direction for long term regional water resources planning. The framework is built on a shared vision to leave the environment in a

better state than we found it and improve the nation's resilience to drought and minimise interruptions to all water users

C.165 The national framework marks a step change in water resources planning. The 5 regional water resources groups will produce a set of co-ordinated, cross-sector plans. These plans will:

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

C.166 The Flood and Water Management Act 2010 and The Flood and Water Regulations (2019) sets out measures to ensure that risk from all sources of flooding is managed more effectively. This includes incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; rolling back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).

C.167 Water Supply (Water Quality) Regulations 2018 focus on the quality of water for drinking, washing, cooking and food preparation, and for food production. Their purpose is to protect human health from the adverse effects of any contamination of water intended for human consumption by ensuring it is wholesome and clean.

C.168 Water Environment (Water Framework Directive) (England and Wales) Regulations (2017) protect inland surface waters, transitional waters, coastal waters and groundwater, and outlines the associated river basin management process. These Regulations establish the need to prevent deterioration of waterbodies and to protect, enhance and restore waterbodies with the aim of achieving good ecological and chemical status.

C.169 Groundwater (England and Wales) Regulations (2009) implement in England and Wales Community legislation on pollution of groundwater. They provide rules for the granting by the Environment Agency of a permit under these Regulations, consent under section 91(8) of the Water Resources Act 1991 and (with exceptions) an environmental permit under the Environmental Permitting (England and Wales) Regulations. In addition, the Regulations create an offence of discharge of a hazardous substance or non-hazardous pollutant without a permit, provide for powers of enforcement of the Environment Agency and prescribe penalties for offences committed under these Regulations.

C.170 Urban Wastewater Treatment Regulations (2003) protect the environment from the adverse effects of urban wastewater discharges and certain industrial sectors, notably domestic and industrial wastewater. The regulations require the collection of wastewater and specifies how different types of wastewater should be treated, disposed and reused.

C.171 The Water Resources South East (WRSE) Regional Plan (2025) sets out predictions, targets and schemes to provide water supply for the next 50 years. The regional plan provides a blueprint for water supply investment by each of the six water companies (South East Water, SES Water, Affinity Water, Southern Water, Thames water, Portsmouth Water) in the region so to provide an affordable, resilient and sustainable water supply for their customers while protecting and enhancing nature.

C.172 The Thames Basin River Management Plan (2022) sets out the current state of the water environment; pressures affecting the water environment; environmental objectives for protecting and improving the waters; programme of measures, actions needed to achieve the objectives. It also informs decisions on land-use planning because water and land resources are closely linked.

Implications of the water quality policies and plans review

C.173 The London Plan should consider setting out approaches to promote the efficient use of water and limit all types of pollution including water pollution. Policies should also seek to limit pressure on the wastewater treatment (WwT) infrastructure and water supply. The London Plan must include measures to protect, manage and conserve water resources and water (river and groundwater) quality.

Relevant international level plans and programmes

C.174 In light of the four World Heritage Sites located in London, the following are relevant in implementing the UK's obligations under the World Heritage Convention:

- UNESCO World Heritage Convention
- European Landscape Convention
- The Convention for the Protection of Architectural Heritage of Europe
- The European Convention on the Protection of Archaeological Heritage (Article 5 in particular)

C.175 UNESCO's Guidance and Toolkit for Impact Assessments in a World Heritage Context (2022) provides impact assessment guidance for World Heritage properties, using a framework that can be applied to both natural and cultural properties either within broader Environmental and Social Impact Assessments, or as a stand-alone Heritage Impact Assessment.

C.176 United Nations Paris Climate Change Agreement (2015) is an international agreement to keep global temperature rise this century well below 2 degrees Celsius above pre-industrial levels.

C.177 European Energy Performance of Buildings Directive (2018) aims to promote the energy performance of buildings and building units. Requires the adoption of a standard methodology for calculating energy performance and minimum requirements for energy performance. Directive (EU) 2018/844 of the European Parliament and of the Council of 30 May 2018 amends Directive 2010/31/EU on the energy performance of buildings and Directive 2012/27/EU on energy efficiency.

C.178 European Floods Directive (2007) provides a framework for the assessment and management of flood risk, aiming at the reduction of the adverse consequences for human health, the environment, cultural heritage and economic activity.

C.179 The European Landscape Convention (2002) promotes landscape protection, management and planning. The Convention is aimed at the protection, management and planning of all landscapes and raising awareness of the value of a living landscape.

C.180 International Convention on Wetlands (Ramsar Convention) (1976) is an international agreement with the aim of conserving and managing the use of wetlands and their resources.

C.181 European Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) (1979) aims to ensure conservation and protection of wild plant and animal species and their natural habitats, to increase cooperation between contracting parties, and to regulate the exploitation of those species (including migratory species).

C.182 International Convention on Biological Diversity (1992) is an international commitment to biodiversity conservation through national strategies and action plans.

C.183 European Habitats Directive (1992) sets the standard for nature conservation across the EU and enables all 27 Member States to work together within the same strong legislative framework in order to protect the most vulnerable

species and habitat types across their entire natural range within the EU. It also established the Natura 2000 network.

C.184 European Birds Directive (2009) requires the maintenance of all species of naturally occurring birds in the wild state in the European territory at a level which corresponds in particular to ecological, scientific and cultural requirements, while taking account of economic and recreational requirements.

C.185 United Nations Declaration on Forests (New York Declaration) (2014) sets out international commitment to cut natural forest loss by 2020 and end loss by 2030.

C.186 The Valletta Treaty (1992) formerly the European Convention on the Protection of the Archaeological Heritage (Revisited), aims to protect the European archaeological heritage “as a source of European collective memory and as an instrument for historical and scientific study”.

C.187 The United Nations (UNESCO) World Heritage Convention (1972) promotes co-operation among nations to protect heritage around the world that is of such outstanding universal value that its conservation is important for current and future generations.

C.188 The European Convention for the Protection of the Architectural Heritage of Europe (1985) defines ‘architectural heritage’ and requires that the signatories maintain an inventory of it and take statutory measures to ensure its protection. Conservation policies are also required to be integrated into planning systems and other spheres of government influence as per the text of the convention

Appendix D

Baseline information

D.1 London is comprised of 32 borough councils and the City of London. It has 35 local planning authorities, each borough and the City of London Corporation plus two Mayoral Development Corporations, the Old Oak and Park Royal Development Corporation (OPDC). The region covers almost 160,000 hectares making it the smallest in the UK by land area but with the highest population density (56 people per hectare). Approximately 52% of London's land is 'green', which includes parks, gardens, trees and other green spaces. London is the UK's only global city and as such there are closer parallels with other global cities than UK cities. Global cities have a disproportionate impact on their hinterland, patterns of movement and migration, housing markets and economic activity. For example, across Europe it is usually harder to find good housing at a reasonable price in cities with stronger job markets.

D.2 A summary of baseline information covering environmental, economic, and social (including health and equalities) conditions is set out in this appendix as follows:

- London's demographics
- Health and wellbeing, inclusion and safety
- Transport and connectivity
- Heritage and townscape
- Housing
- Economic potential and employment
- Air quality
- Biodiversity and natural environment
- Climate change
- Geology, soils and land use
- Materials and waste
- Noise and vibration
- Water resources and quality

London's demographics

Total population

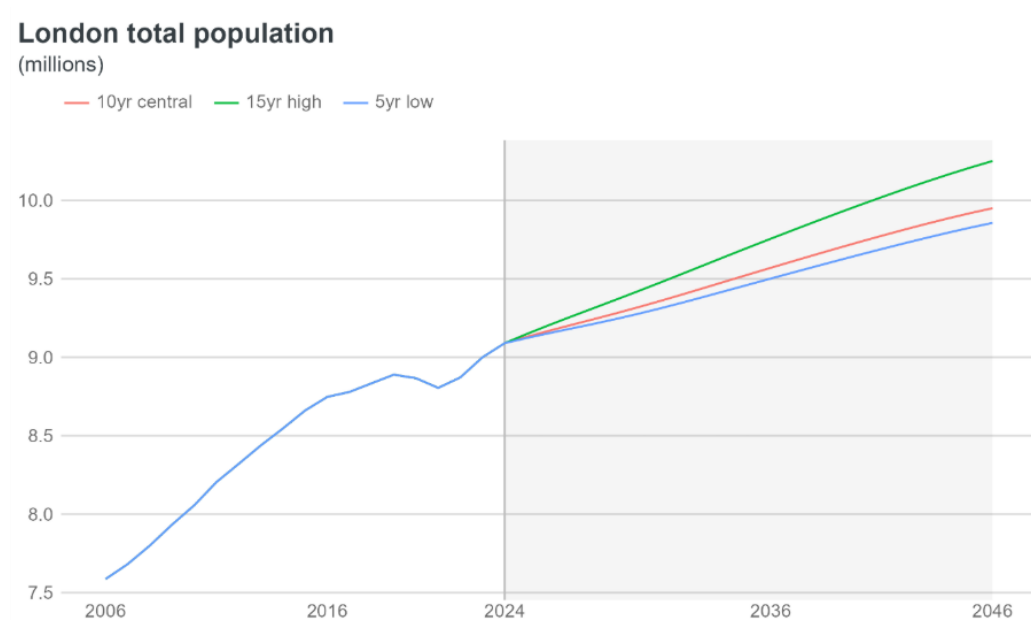
D.3 London's population was 8.8 million in the 2021 census, an increase of 7.7% since the 2011 census. This growth was not consistent across London, with the greatest population growth in the borough of Tower Hamlets (+ 22.1%) and population declines in Kensington & Chelsea (- 9.6%), Westminster (- 6.9%) and Camden (- 4.6%). This population increase was second-largest nationally over the decade, behind the neighbouring South East region.

Population growth

D.4 The GLA 2024-based population projections take the ONS mid-2024 population estimates as their starting point and project forward using a range of assumptions about based on different future fertility, life expectancy, and migration trend. Projection variants are based on five, 10, and 15 years of past migration data, with those based on the 15 years of past data giving the highest overall growth for London, and those based on five years giving the lowest. The central projection is based on 10 years of past migration trends.

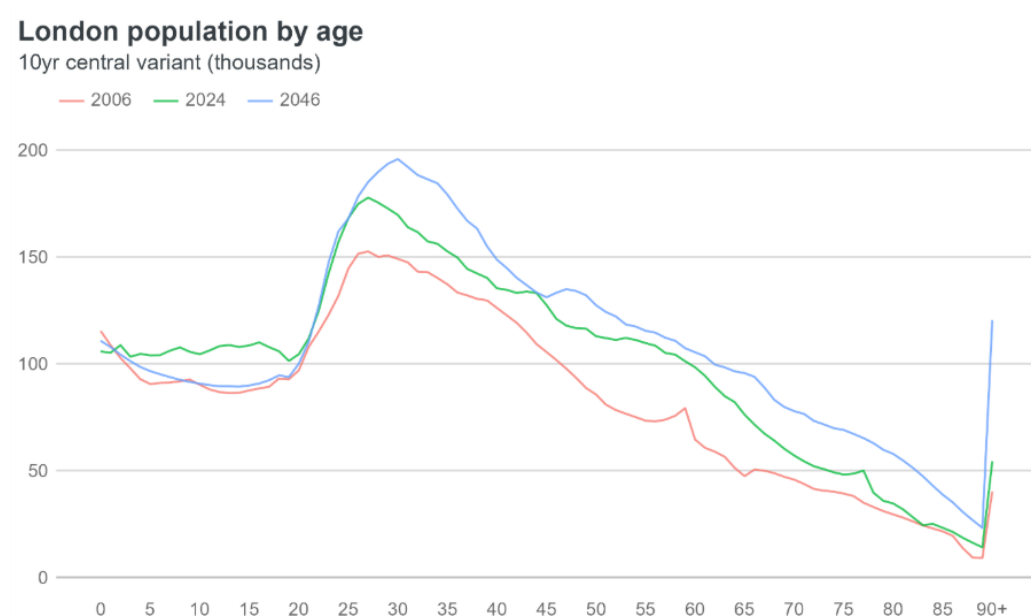
D.5 **Figure D.1** shows the projected growth of London's population for the three core scenarios of the GLA 2024-based projections. These projections give a range for of London's 2046 population of a 9.9 to 10.3 million, equivalent of annualised growth of 35 to 53 thousand per year, with the central projection estimating a population of 9,949,000 by 2046.

Figure D.1: Projected growth of London's population to 2046 for the 10 year central projection, 15 year high projection, and 5 year low projection (Source: GLA draft 2024-based population projections)



D.6 The majority of the projected growth is among those aged 25 to 40 and aged 60 and above. The number of children in London is projected to fall back from recent highs, primarily due to a decline in fertility rates since 2012. The population is set to age significantly over the coming decades, with the number of people aged 80 and over projected to more than double.

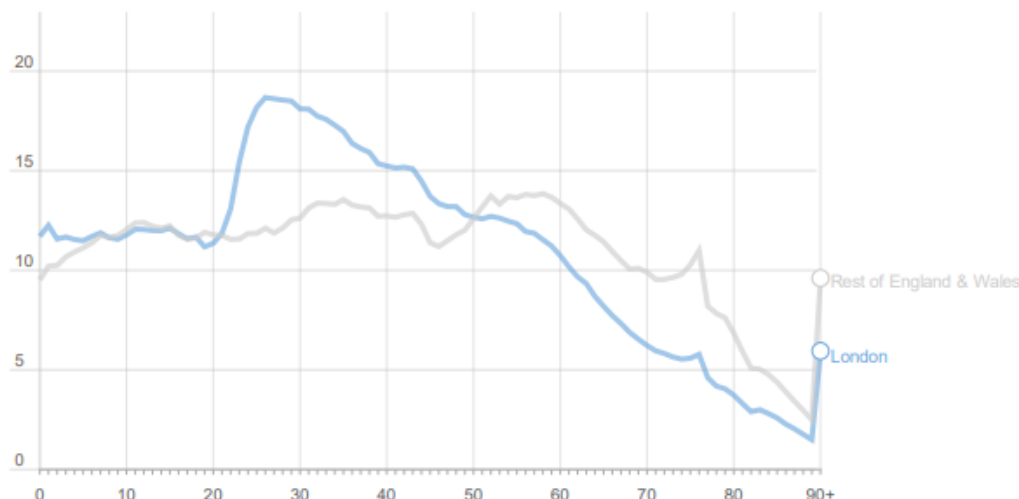
Figure D.2: Projected change in age structure of London's population to 2046 for the 10 year central projection, 15 year high projection, and 5 year low projection (Source: GLA draft 2024-based population projections)



Age structure

D.7 London is a relatively young city, with a median age of 35.9, compared to 41.4 for the remainder of England and Wales. Over the past two decades there has been a consistent positive inflow to London of those aged 18-24 and a consistent negative outflow of those aged 25-44 (those most likely to be parents of young children). This is a result of the large numbers of young adults who come to work or study in London and the tendency for Londoners to relocate outside the capital from their mid-30s onwards.

Figure D.3: Population age structure. Persons per 1,000 total population, estimates for year ending June 2023 (Source: ONS population estimates for England and Wales)



D.8 London's growth is not expected to be evenly distributed between age groups, and changes over the last decade also show spatial variations between Inner and Outer London. While London's population is getting younger, the number of children is decreasing as a share of overall residents. Over the last decade, most inner London boroughs saw large decreases in the number of younger children (aged 0-10). Most outer London boroughs had stable or increased numbers. The degree of change varies between boroughs, from minus 25% in Westminster and Kensington and Chelsea, to plus 23% in Havering.

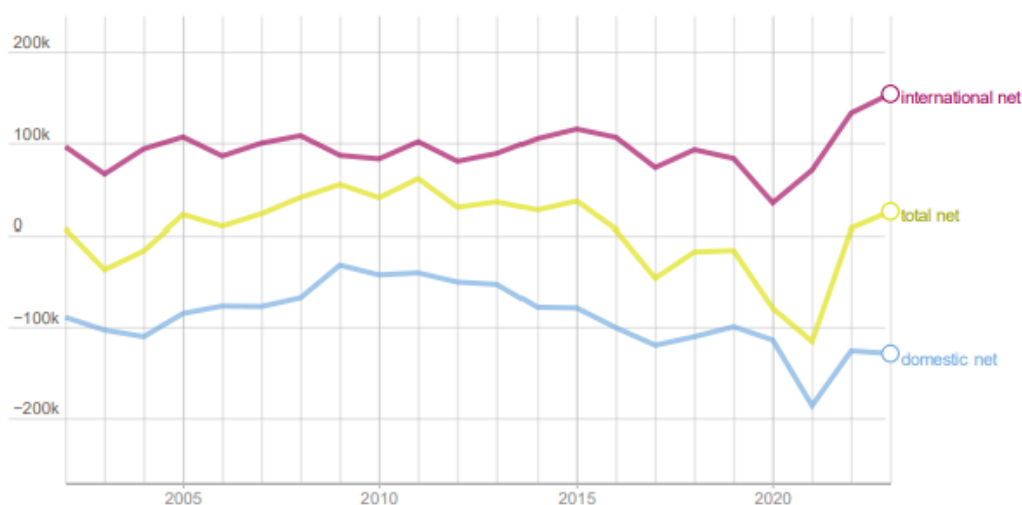
D.9 A relatively small proportion of London's population is over 65, with 9.4% in Inner London and 13.6% in Outer London compared to the rest of England at 19.8%. Nearly a quarter of the population is over 65 in Havering and Bromley.

Migration and natural change

D.10 London's population growth is a function of the interplay between international and internal migration and natural change. The number of births in London peaked around 2012 and has since continued to fall despite there being more women of reproductive age. The decline in the fertility rate is greater in Inner London than in the rest of England and Wales, while the decline in Outer London is similar to the national picture. Economic conditions including the cost of housing have been identified as a significant contributory cause for the decline in births and are key push factors for young people and families leaving London.

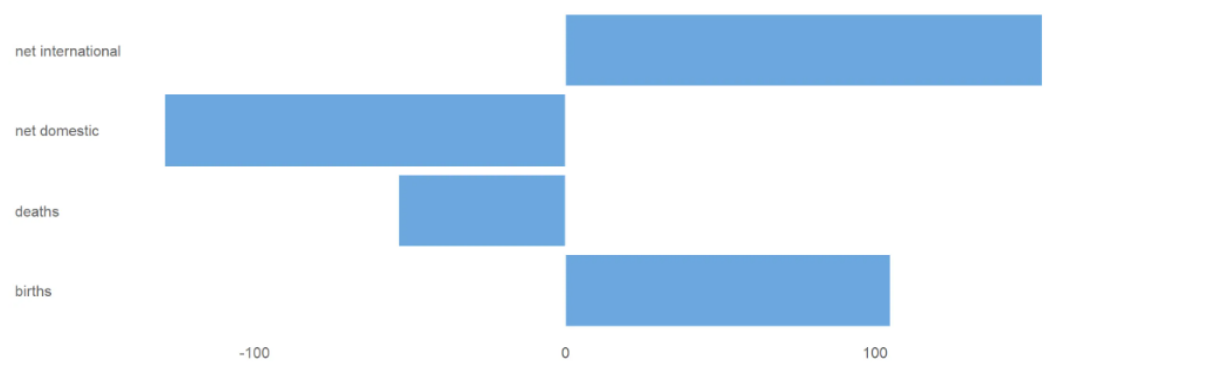
D.11 Based on ONS 2023 mid-year estimate of population (the most recent available), most population growth in the previous year (c. 52,000 of the c. 76,000 total) was due to natural change – the difference between births and deaths. The remainder was accounted for by net migration (the total of internal and international). An outflow of domestic migrants in London is typical, and this has been the case each year for the past two decades. However, excluding the spike in 2021 linked to the COVID-19 pandemic, net outflows are now at their highest level this century.

Figure D.4: Annual net migration (domestic, international, and total) to mid-2023 (Source: ONS population estimates and GLA modelled estimates)



D.12 A high proportion of London's population is made up of individuals and families who moved here from another country. At the time of the most recent census, 41% of Londoners were born outside the UK, compared to the UK average of 16% [\[See reference 97\]](#). There has been a marked change in immigration since 2021. This can be attributed to the end of free movement for EU nationals, easing of travel restrictions following the COVID19 pandemic, and the war in Ukraine. At over 150,000, the 2023 mid-year estimate (MYE) value for London's net international migration was more than 18% higher than 2022 and represents a considerable increase from 78,000 in 2021. The geographical distribution of new migrants is uneven across London.

Figure D.5: Components of population change (net internal migration, net domestic migration, births, deaths) in London for year ending June 2023 (Source: ONS MYE)

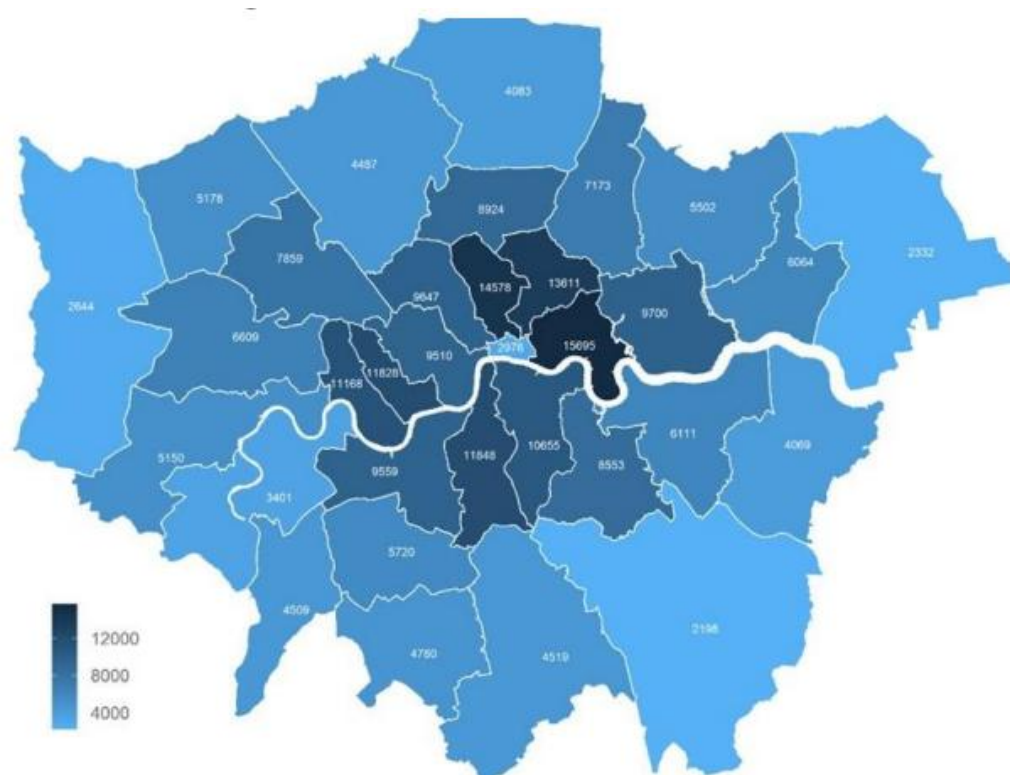


D.13 London’s net migration balance is very small when compared to its annual population turnover (the sum of flows to and from the region. For the year ending mid-2023, London’s total net migration was estimated at +25 thousand and its turnover at 1.13 million. This level of population churn can impact on people’s sense of belonging to an area and community cohesion.

Spatial distribution

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

Figure D.6: Population density (persons per square km) by London Borough
(Source: 2021 Census)



Diversity

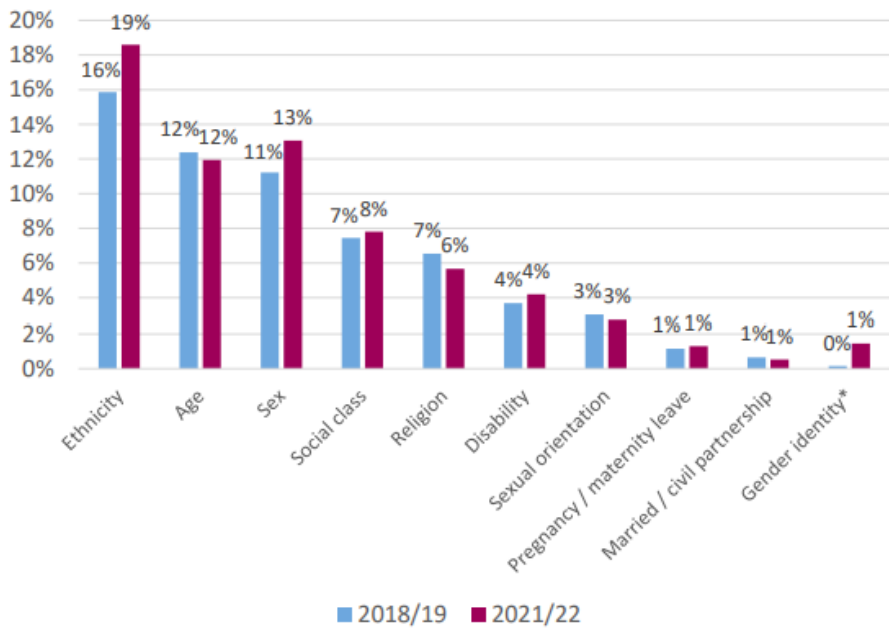
D.15 London's diversity is one of its biggest assets. There are more than 300 languages spoken in London, and nearly half of all Londoners identify as Black, Asian, Mixed of Other (ONS). Most Londoners exhibit high levels of belonging – in the 2021-22 Survey of Londoners [See reference 98], 80% felt they belonged to the city, and 73% felt they belonged to their local area (with local area defined as being 15-20 minutes walking distance from their home). Feelings of belonging varied by ethnicity, religious belief, and age. For example, older Londoners (82%) were far more likely to feel they belonged to their local area than Londoners aged 16-24 (68%). At 64%, Londoners aged 25-34 reported the lowest levels of belonging.

D.16 Around 8 in 10 Londoners (80%) agree that their local area is a place where people from different backgrounds get on together. However, Londoners from some of London's under-served communities had lower than average rates of agreement that people from different background get on well in their area. This included Londoners who said they were not proficient in English (66%), those not working because of sickness or disability (70%), Londoners with no qualifications (71%), and those who were digitally excluded (71%).

D.17 Gender based violence and harassment is common in public spaces and varies from daily microaggressions such as staring and catcalling, to groping, flashing, stalking and more extreme forms of violence such as rape and abduction. Some 71% of women in the UK have experienced some form of sexual harassment in a public space, with this number rising sharply to 86% among women aged 18–24 [See reference 99].

D.18 Many Londoners experience unfair treatment because of one or several protected characteristics, or because of their social class – 37% in the 2021/22 Survey of Londoners. Ethnicity was the more common characteristic, followed by sex. Other than for ethnicity, for each characteristic, there has been no significant change since 2018-19.

Figure D.7: Percentage of Londoners aged 16 and over treated unfairly because of protected characteristic or social class, 2018/19 and 2021/22 (Source: Survey of Londoners)



D.19 London is the most diverse region of the UK in terms of race, religion, nationality and sexuality. White groups made up 54% of London’s population in 2021. Of the remaining 46%, Asian groups made up 21%, Black groups 14% and Mixed groups 6% and Other ethnic groups 6%.

D.20 London has many faiths and beliefs represented within the population. In the 2021 Census, the largest religions were Christianity (40.6%), Islam (14.9%), Hinduism (5.15%), Judaism (1.65%), Sikhism (1.64%), Buddhism (1.0%), and others (0.9%). The number of London residents having no religion is growing. Across

London, the percentage of residents who described themselves as having "No religion" increased from 21.0% to 27.1%.

D.21 In the 2021 census, 86% of London's population aged 16 or over identify as being heterosexual or straight, while 4.3% identify as gay, lesbian, bisexual or other sexuality (compared to 3.0% for the rest of England and Wales). The remaining 9.5% did not answer. LGBTQ+ (lesbian, gay, bisexual, trans, queer, +) people are as diverse as other Londoners. As such, their experiences may differ depending on other aspects of their identity. LGBTQ+ [\[See reference 100\]](#) Londoners are more socioeconomically polarised than other Londoners, as they are more likely to report both being financially comfortable and in poverty.

D.22 The 2021 census also recorded that 0.9% of Londoners aged 16 or over identified with a gender identity different from their sex registered at birth. This compared to 0.5% for the rest of England and Wales. 7.9% of Londoners aged 16 or over did not answer the question.

D.23 Across London, 13.2% of the population is disabled (using the definition under the Equality Act 2010), with this figure varying slightly between boroughs. This compares to 24% of the total English population [\[See reference 101\]](#). The characteristics of disabled Londoners highlight the intersectionality between Londoners with disabilities and other groups with protected characteristics. The characteristics of disabled Londoners are as follows: 55% are women, 46% are aged 65 or over (compared to 9% of all Londoners), 84% are retired or not working, and 41% have a household income of less than £10,000 [\[See reference 102\]](#).

D.24 Some Londoners who share protected characteristics are more likely to experience poverty (after housing costs). The Households Below Average Income report shows that [\[See reference 103\]](#):

- Young Londoners (aged under 24) are more likely to be in poverty than other Londoners (32% vs 22%).
- Women are more likely to be in poverty than men (28% vs 24%).
- Disabled people are more likely to be in poverty than non-disabled people (30% vs 25%). People living in a household where someone is disabled are also more likely to be in poverty than people living in a household where no one is disabled (31% vs 24%).
- People from Black, Asian and minority ethnic backgrounds are more likely to be in poverty than White Londoners [\[See reference 104\]](#). 18% of White Londoners are in poverty, compared with 38% of Asian Londoners, 36% of Black

Londoners, 28% of Mixed ethnicity Londoners, and 43% of Londoners from an Other ethnic group.

D.25 Some Londoners who share protected characteristics are more likely to be unemployed, reflecting structural barriers in the labour market. The ONS Annual Population Survey 2024 [\[See reference 105\]](#) sets out that:

- Young Londoners are much more likely to be unemployed: 31% of 16-19 year olds, 16% of 16-24 year olds, and 13% of 20-24 year olds are unemployed.
- Disabled Londoners are twice as likely to be unemployed as non-disabled Londoners (8% vs 4%).
- Londoners from some Black, Asian and minority ethnic backgrounds are more likely to be unemployed. 9% of Pakistani and Bangladeshi Londoners are unemployed, along with 7% of Black Londoners, 10% of Mixed ethnicity Londoners and 9% of Londoners from an Other ethnic background.
- Londoners from Muslim, Hindu or any Other religious background are more likely to be unemployed (9%, 6% and 7% respectively) than among all Londoners.

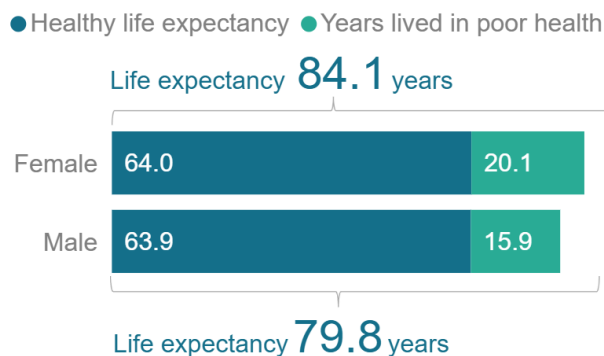
Health and wellbeing, inclusion, and safety

Health, health inequalities, and health infrastructure

D.26 The cost-of-living crisis continues to impact on the health of Londoners [\[See reference 106\]](#). Along with shifts in the housing market and escalating climate risk, this has exacerbated ethnic and socioeconomic inequalities in London across education, income and poverty, crime and the built environment [\[See reference 107\]](#). As London responds to the climate emergency, climate risks disproportionately affect the most deprived and disadvantaged individuals who are both more exposed and more vulnerable to their impacts, with reduced capacity to adapt [\[See reference 108\]](#) [\[See reference 109\]](#).

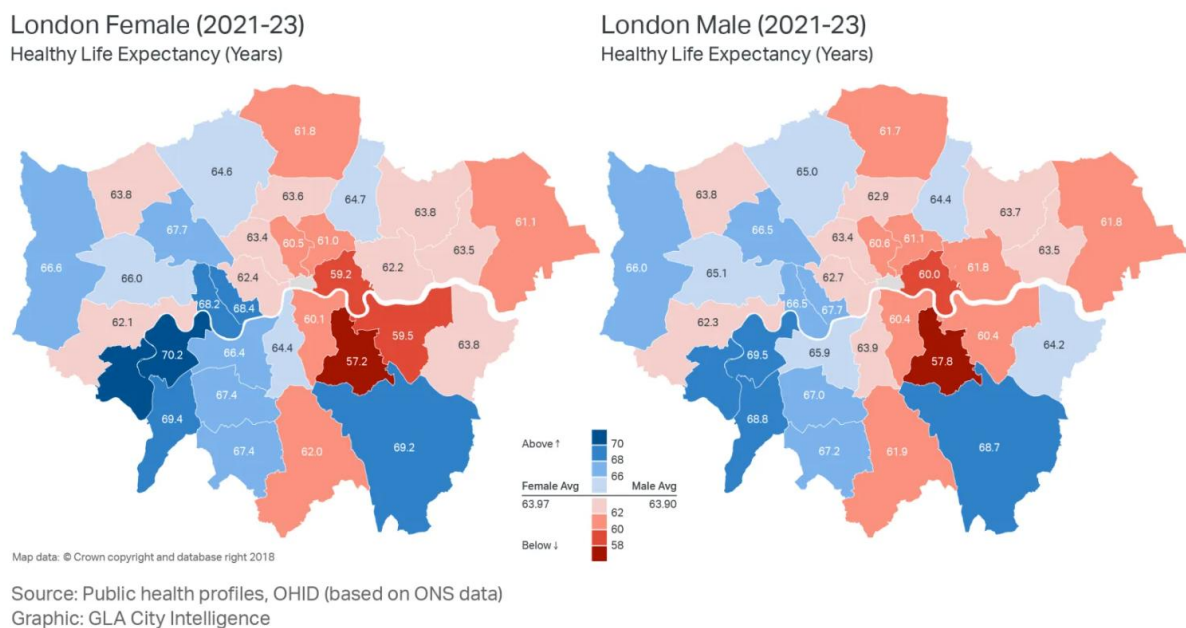
D.27 Built, natural and social environment are key determinants of health outcomes [\[See reference 110\]](#). Beyond the headline health data presented here, health outcomes are linked and relevant in other topics in the rest of this report (e.g. housing, transport, air quality and climate change).

Figure D.8: Life expectancy at birth and healthy life expectancy of Londoners, 2021-23 [See reference 111] [See reference 112]



D.28 There is more than 10-years variation in healthy life expectancy between London boroughs. Lower life expectancy broadly correlates with higher deprivation.

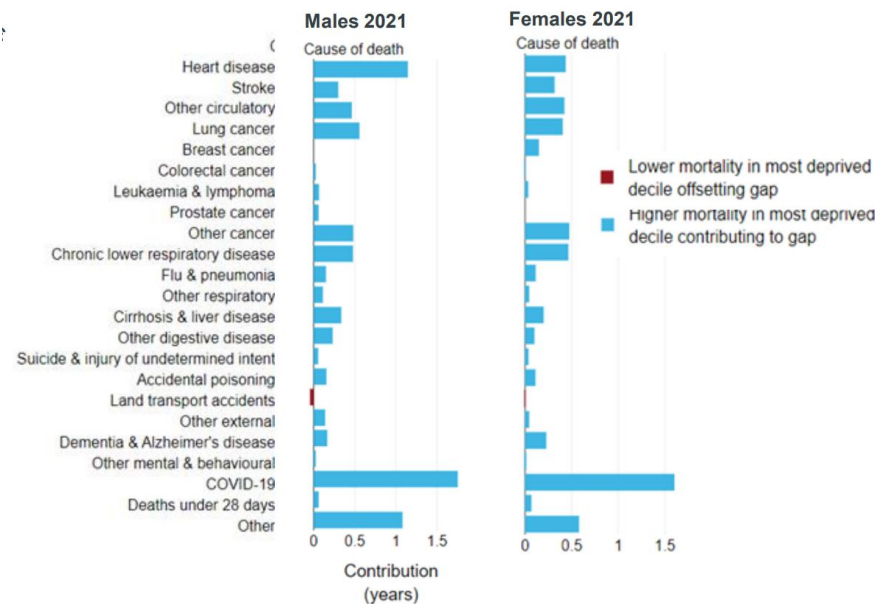
Figure D.9: Healthy Life Expectancy across London's boroughs (2021-23) [See reference 113] [See reference 114]



D.29 The leading causes of death [See reference 115] in London (all ages, 2024) were cancer (26%), dementia and Alzheimer's disease (11%), ischaemic heart diseases (10%), cerebrovascular diseases (5%), and chronic lower respiratory diseases (5%). Disparities in death rates across nearly every cause of death contributed to the life expectancy gap between the most and least deprived deciles in 2021. Apart from COVID-19, circulatory conditions dominate the gap in Life Expectancy between the most and least deprived deciles illustrating an important

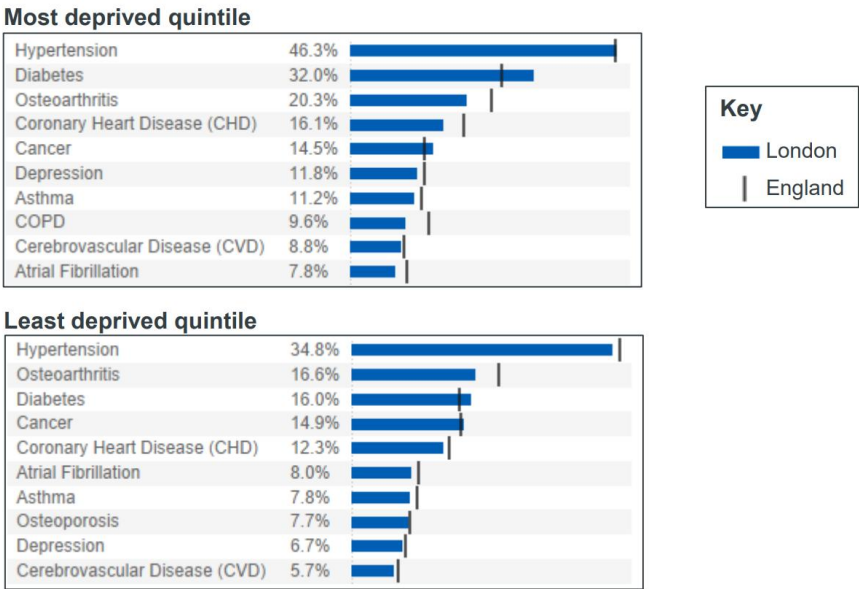
prevention opportunity – these gaps are largely due to the conditions in which poorer Londoners live and work¹¹.

Figure D.10: Breakdown of the gap in life expectancy in between the most and least deprived deciles by cause of death in London, 2021 [See reference 116]



D.30 Prevalence of physical health conditions [See reference 117] in London in 2023/24 include long-term musculoskeletal problems (aged ≥17 years, 2023, 13%), hypertension (all ages, 11%), diabetes mellitus (aged ≥17 years, 7%), asthma (aged ≥6 years, 5%), and cancer (all ages, 3%). Prevalence of mental health conditions [See reference 118] in London include depression 9.5% (2022-23) and severe mental illness 1.1% (2023-24). In terms of wellbeing, 24% of Londoners reported high anxiety and 5% had low happiness score. Using modelled general practice data, prevalence of several commonly diagnosed health conditions was higher in deprived groups.

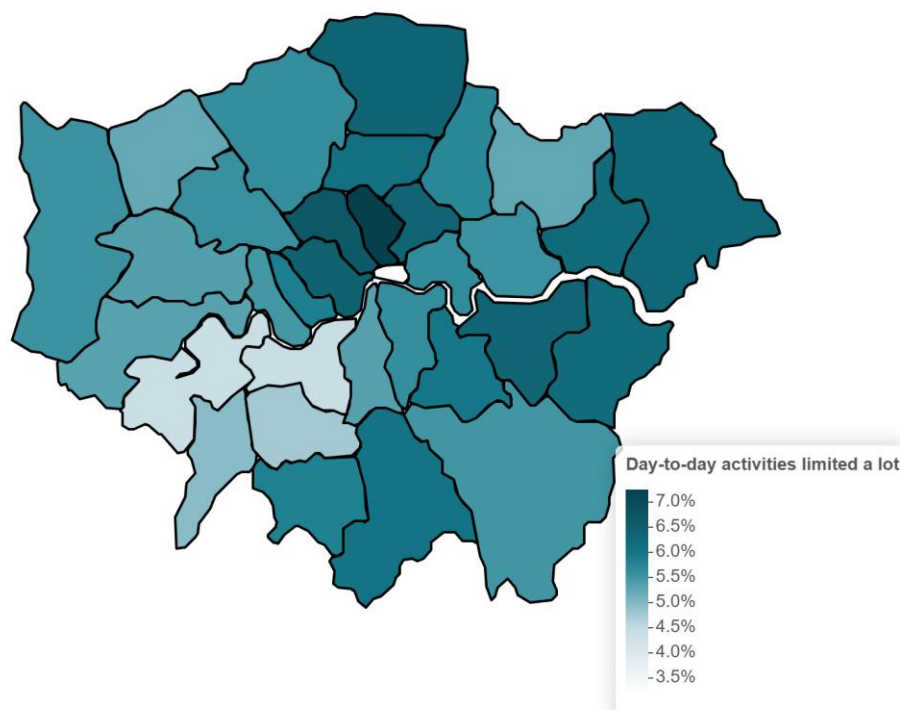
Figure D.11: Comparison of prevalence of several common diseases, people aged 65-84, most and least deprived groups, London, September 2022 [See reference 119]



D.31 The causes of death and long-term conditions prevalent in London listed above are driven by risk factors such as obesity, physical inactivity and air pollution, which in turn are influenced by the built environment. This will be discussed in later sections.

D.32 Across London, 13% of people are disabled (using the definition under the Equality Act 2010 [See reference 120]), with higher prevalence in more deprived neighbourhoods. Adaptations to aid mobility in homes can make it easier for disabled and older people to continue to live in their homes and reduce demand on health and social care services [See reference 121].

Figure D.12: Percentage of Londoners whose day-to-day activities are limited by their disability, Census 2021



D.33 Tobacco use, high body mass index (BMI), high blood sugar, and poor diet were the top health behavioural risk factors [\[See reference 122\]](#) driving death and disability in London in 2023. These risk factors are influenced by the social and structural environment and are unequally distributed across the population. Smoking prevalence is 10% across London (2024), although significant inequalities remain with rates higher in deprived areas, in those with mental illness and routine and manual occupations [\[See reference 123\]](#).

D.34 Half of London's adults are overweight or obese [\[See reference 124\]](#) (58%, 2023-24). Over one third (37%, 2024-25) of Year 6 children in London were classified as overweight or obese [\[See reference 125\]](#). Obesity is higher in the most deprived areas, among unemployed and disabled people, and in some ethnic groups [\[See reference 126\]](#). Diet and physical activity are key risk factors for overweight/obesity. In England, 5-a-day fruit and vegetable consumption is lower in the most deprived areas, among unemployed and disabled people, and Asian and Black people [\[See reference 127\]](#).

D.35 In London, only 67% adults and 47% of children and young people are physically active (2023-24) i.e. meet the UK Chief Medical Officers' recommended levels of physical activity [\[See reference 128\]](#). Physical inactivity was higher among those in routine/semi-routine jobs and long-term unemployment, people with a

disability, and some ethnic groups [\[See reference 129\]](#). Spatial development that enables active travel (through walking, cycling or using public transport) [\[See reference 130\]](#) can support Londoners to meet the physical activity guidelines [\[See reference 131\]](#). Over a quarter of Londoners (27.6%) now live within 400m of the cycle network [\[See reference 132\]](#).

D.36 In 15 of London's 32 boroughs, adult activity levels fall below the national average, leaving tens of thousands of residents at increased risk of poor health and reduced wellbeing. The top performing boroughs, such as Camden and Islington, are home to some of the most active residents in the country, with a significant percentage (77.4% and 75.7% respectively) of residents meeting the recommended 150+ minutes of physical activity per week. In contrast, residents of Havering (52.9%), Bexley (54.6%), and Barking & Dagenham (54.6%) are significantly less active – a gap of nearly 25% from the most active boroughs [\[See reference 133\]](#).

D.37 Density of outlets selling unhealthy commodities such as alcohol, tobacco, and fast food correlates with deprivation [\[See reference 134\]](#). London has the highest density of fast-food outlets in England (138.5 per 100,000 population, 2024), highest density of premises licensed to sell alcohol (19 per km², 2023/24), and second highest density of gambling premises (17 per 100,000 population, 2025) [\[See reference 135\]](#).

D.38 London has 51 full time equivalent general practitioners (FTE GP) per 100,000 patients compared to 61 for England (September 2025). This ranged from 45 in North West London Integrated Care Board (ICB) to 58 GPs per 100,000 patients in South West London ICB (total FTE and registered patient count for all the practices that supplied valid data at ICB level) [\[See reference 136\]](#). There will be variation by boroughs and in smaller areas, with data held by Integrated Care Systems. There is a gap in information collated regionally on healthcare infrastructure [\[See reference 137\]](#) put in place to support new developments (some of which may be supported by the Community Infrastructure Levy and section 106) [\[See reference 138\]](#) including community health centres. Much of the existing NGS estate is not equipped for 21st century healthcare and the ambitions of the NHS 10 Year Plan 'Fit for the Future'. The uses of the GP to patient ratio does not fully recognise the challenge to the NHS estate with an increasing number of other health professionals within primary care and an emphasis on providing care closer to home with services moving from acute sites where appropriate.

Education

D.39 Parents in London struggle to find childcare to a greater extent than in other parts of the country, and this is particularly the case in more disadvantaged areas.

This shortage of childcare is particularly acute for parents of a child who is disabled or has special educational needs, or for parents who work atypical hours (source Early years childcare in London [\[See reference 139\]](#)). Inner London has the highest early years childcare costs in the country, followed by Outer London, although overall costs have reduced for families eligible for the working parent entitlement benefits compared to previous years. Those who are not eligible continue to face rising costs. The sufficiency of childcare provision is generally better in Inner London than Outer London [\[See reference 140\]](#).

D.40 The total number of children in London's primary schools has been falling since around 2016. For Inner London, the trend is still downwards while for Outer London the numbers appear to have stabilised. GLA analysis suggests the most likely scenario is for the size of the primary school age population to continue to decrease over the next decade. This fall will likely affect an increasing number of Inner London boroughs, and some Outer London boroughs. In contrast, a small number of Outer London boroughs are likely to experience an increase in primary-school-age children [\[See reference 141\]](#).

D.41 London secondary school pupils consistently outperform those in other regions, and the attainment gap between pupils eligible for free school meals and those who are not is narrower than elsewhere. The GLA's Subregional Pupil Projections [\[See reference 142\]](#) predict that the number of secondary school children will fall from 452,000 in 2024/2025 to 376,000 in 2034/2035. In terms of regional variations, this follows broadly the same trends as with primary school children, with London predicted to see greater and faster declines in secondary school children than the rest of England, and Inner London predicted to see greater and faster declines in secondary school children than Outer London. However, for the most recent projections do not yet incorporate the implications of an increased housing target for the next London Plan.

D.42 There is an increasing need for special education needs and disabilities (SEND) provision. According to CCN analysis [\[See reference 143\]](#) of DfE and ONS data, the percentage of children and young people with Education, health and care plans (EHCPs) grew from 1.45% in 2014/15 to 3.38% in 2024/25. This increase in need is not unique to London and is attributed by the report to increase in three types of need – autism and other neurodiverse needs (ASD), social emotional and mental health needs (SEMH), and speech language and communication needs (SLCN).

D.43 London is home to 33 universities and multiple higher education colleges, providing for over half a million students [\[See reference 144\]](#). More than a quarter of undergraduates and two thirds of postgraduates come from outside the UK. London's student population is also local when compared to other regions of the country –

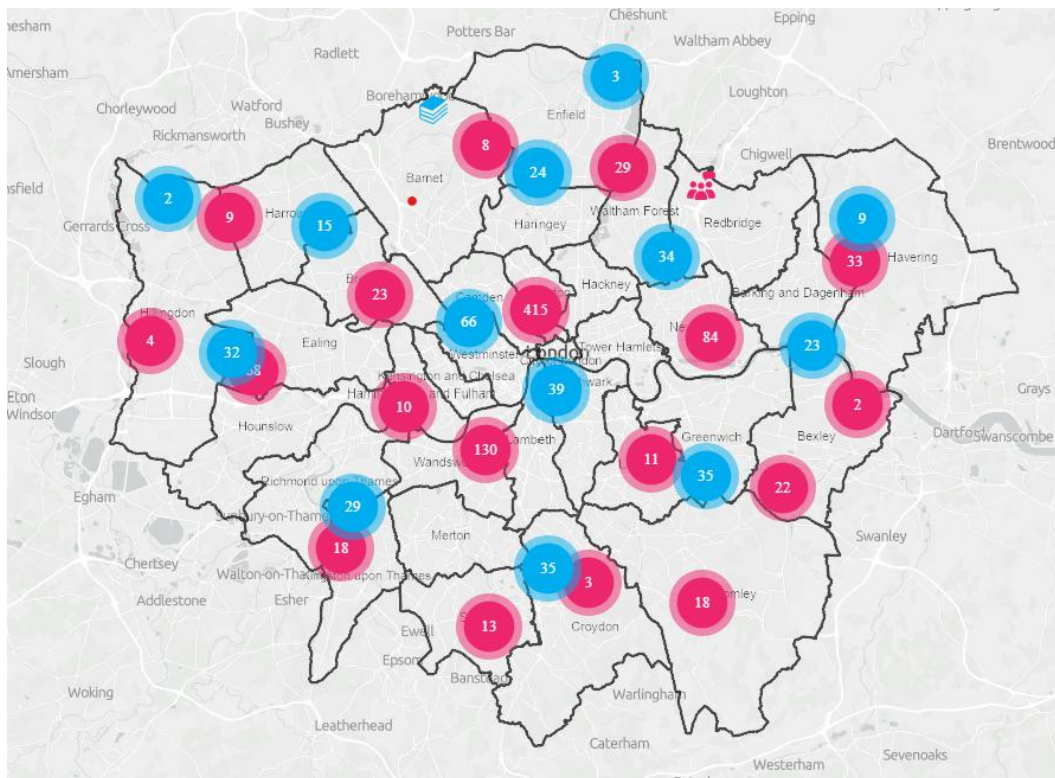
more students at London universities come from their 'home' region than at universities in other regions. Universities are situated across London, and range in size from large to small and specialist institutions.

D.44 The latest available data shows that 84% of London Higher Education Institution graduates in academic year 2019/20 were either in employment or further study the year after graduating (Source DoE, LEO Graduate and Postgraduate Outcomes). While this is slightly lower than the rate for England overall, London has a more competitive labour market with a higher share of the workforce having degree qualifications and London attracting international talent. This makes it comparatively more difficult for new graduates to enter the labour market.

Social and community facilities

D.45 Accessible arts, cultural, entertainment, leisure, recreation and sports facilities are important elements of social infrastructure and contribute greatly to the quality of life of Londoners. With 325 public libraries, London has the largest public library network of any major world city [\[See reference 145\]](#) an extensive network of borough-run and community led community centres (901 recorded in 2022). In contrast, the Mayor's 2018 Sports for All of Us Strategy highlights that London has around half the number of leisure facilities per 100,000 people as the rest of the country.

Figure D.13: Numbers of Community Centres (pink) and Libraries (blue) in London, 2022 (Source GLA Cultural Infrastructure Map of London)



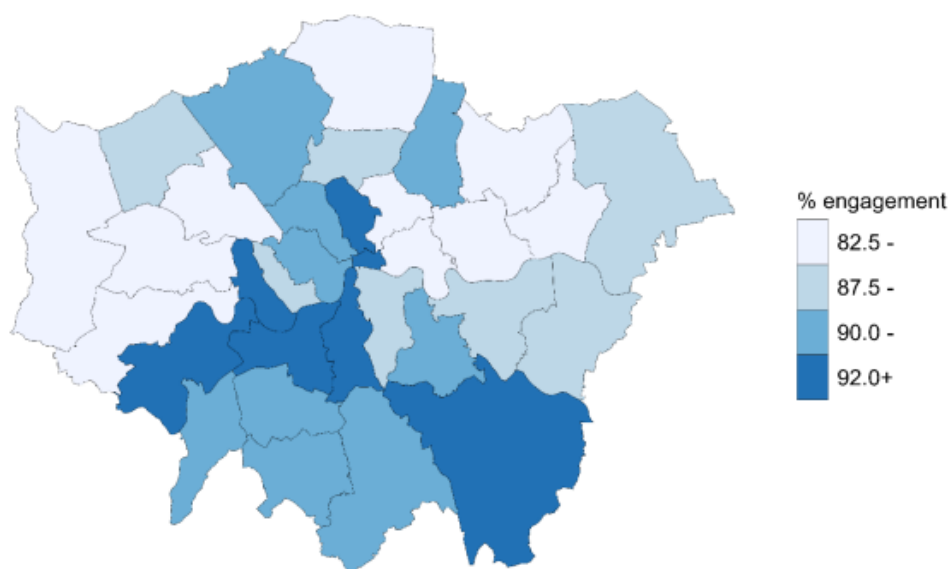
D.46 Alongside these more formal spaces, public spaces such as playgrounds, parks, and local high streets are also important to the wellbeing of communities. Results from the 2021-22 Survey of London indicate going to parks has a strong income gradient, with lower-income Londoners (those with an annual income of less than £14,900) less likely to have gone to the park in the last month (54%) than the highest-income Londoners (annual income of more than £58,900) (87%). This income gradient is likely to reflect easier access to nearby parks for those on a higher income, and also those on a higher income working shorter hours or being more likely to work from home.

D.47 Safe, inclusive, and stimulating play space is essential to child development, and physical and mental wellbeing. London needs high quality play space that meets the needs of children across the age spectrum, from very young (0-4, to older children (5-11), and teenagers (12-15, 16-17). Pan-London data on the quantity and/or quality of play space does not exist. Some boroughs conduct their own audits of play space, either through open space audits or play space strategies (e.g. LB Tower Hamlets, LB Lewisham).

D.48 Engagement with the arts in London has increased in recent years, however it varies significantly between boroughs, with values ranging from 96% in Richmond

Upon Thames down to 83% in Barking and Dagenham, and 84% in Redbridge. The number of pubs in London stopped declining around 2015 following 15 years of a high level of closures [\[See reference 146\]](#).

Figure D.14: Percentage of adults who engaged with the arts in-person in the last 12 months by borough, 2023/24 (Source: Data from Participation Survey)



D.49 Digital exclusion can be found across all corners of London. It impacts older Londoners, those living in poor health or with a disability, those with low numeracy and literacy skills, those living on a low income, and those in areas of poor infrastructure coverage. Bridging the digital divide is a complex challenge, covering basic skills, connectivity, access to a device and affordability heightened by the cost-of-living crisis. As more and more services are shifted online, inequalities are created for those who are digitally excluded such as spending more time transacting with banks, or higher food costs without online shopping, or being unable to access NHS online services. Existing community facilities such as libraries are important as hubs for delivering digital inclusion support. The benefits of free public Wi-Fi are increasingly being recognised as a critical tool for digital inclusion. Public Wi-Fi helps people who cannot affordable private broadband and/or who live in areas with poor connectivity to get online. Reliable and free Wi-Fi can also support enhanced public safety, allowing people to stay connected as they move around the city.

Poverty and deprivation

D.50 Despite being the richest city in the UK, London also has the most people in poverty. Around 1 in 5 Londoners (19%) live in relative poverty (after housing costs);

this is roughly 1.7 million people. A third of children in London live in poverty, and one child in 21 is homeless and living in temporary accommodation.

D.51 The poverty rate is highest in London compared with all other regions of the UK and especially high in Inner London. There is a clear pattern that Londoners living in the most deprived areas have poorer outcomes compared with those living in the least deprived areas across various measures (e.g. neighbourhood relationships, trust and social isolation). Poverty and deprivation are important predictors of loneliness and act as major barriers to social integration. Londoners experience more social isolation than people in other regions of the UK, and loneliness is particularly prevalent among older people.

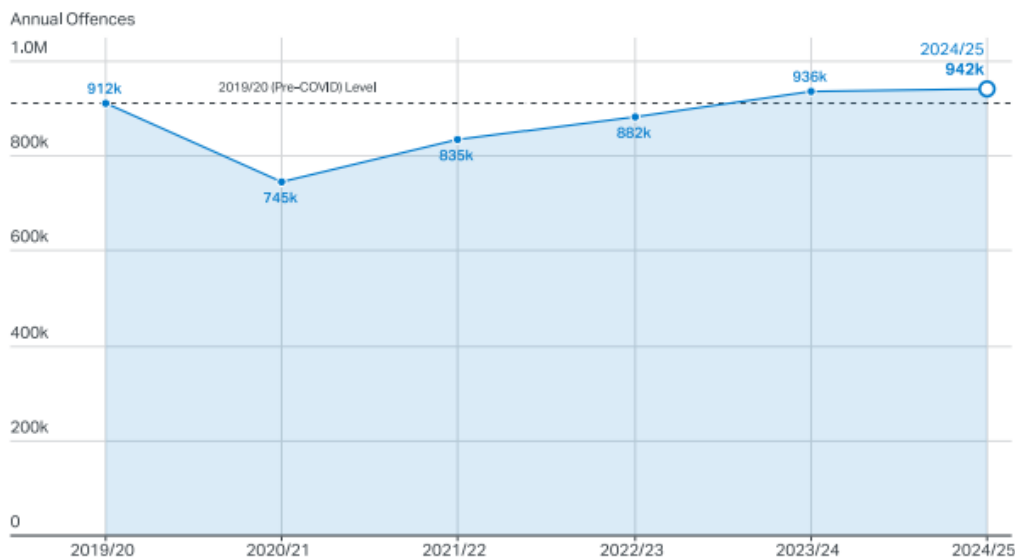
D.52 Based on the UK Government's qualitative index of multiple deprivation (IMD), many places in London are among the most deprived in the country. The pattern of deprivation is geographically complex, with a patchwork of contrasts between neighbourhoods within boroughs. Areas of deprivation are often in concentrations and follow particularly corridors. While neighbourhoods in Central London tend to be among the least deprived, these are surrounded by areas of deprivation such as Tower Hamlets in the East and the north of the City of Westminster. Suburban areas of Outer London, particularly in the south west, are among the least deprived.

Crime, safety and security

D.53 London is a relatively safe city when compared to other global cities and the likelihood of being a victim of crime is low in London. However, as a global city it is at higher risk of terrorist attacks than other cities in the UK. Heightened risks of threats to security can impact London's economic competitiveness and tourism.

D.54 During the COVID-19 pandemic and lockdown periods, recorded crime levels reduced significantly within London. This was followed by year-on-year increases between 2021/22 and 2023/24. Based on 2024/25 data, London's recorded crime level looks to have stabilised again. There continues to be an uneven distribution of crime across London. Westminster (89,280 offences), Camden (42,814 offences), and Newham (40,956 offences) remain the boroughs with the highest volume of total offences.

Figure D.15: Total annual notifiable offences in London, 2019/20 to 2024/25
(Source: MPS Crime Data Dashboard)



D.55 Acquisitive crime (theft, burglary, robbery, motor vehicle crime) accounted for 53.8% of the total offences recorded between April 2024 and March 2025 (compared to 52% during 2023-24), and violent crime (violence against the person and sexual offenses) accounting for 27.8% (compared to 29.5% during 2023-24). Violent crime in London is disproportionately concentrated in deprived areas, with significant local variations, and disproportionately affects specific socio-demographic groups, including young Black men, men in general (except for domestic violence where women are most affected), and people with disabilities.

D.56 MOPAC's Public Attitude Survey [\[See reference 147\]](#) is used to gain an understanding of Londoners' perceptions and experience of policing and crime within London. Levels of self-reported victimisation – the percentage of people saying they have experienced something they would consider to be a crime - have remained stable over the past year at 5%. Just under half of Londoners are worried about crime and anti-social behaviour in their local area, and around one in five Londoners feel hate crime is a problem in their area. Females are significantly less likely to feel safe after dark than males – in Q1 25/26, 58% of females felt safe after dark compared with 77% of males.

D.57 Some groups of Londoners are more likely to be concerned about crime and safety in their area. In Q1 2025/26 LGBT+ Londoners, mixed ethnicity Londoners, and Jewish Londoners were most likely to feel hate crime is a problem in their area. Disabled Londoners, females, and Sikh Londoners were least likely to feel safe walking alone after dark. Fear of crime can be a barrier to walking or using public

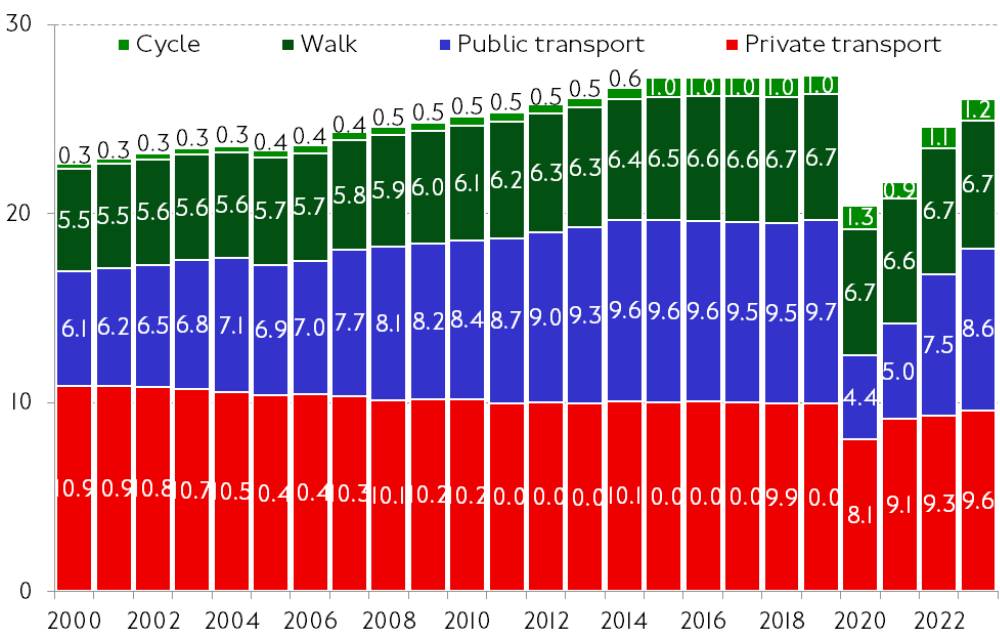
transport, and more generally can be stressful and limit people’s access to activities and contribute to social isolation.

Transport and connectivity

Mode share

D.58 The share of trips in London that were made by public transport, walking or cycling increased by over 10 percentage points between 2000 and 2015, with around 9 percentage points from growth in public transport use. The share of trips by these modes then stalled up to 2020, in part due to a decline in bus use (the number of journey stages dropped by over 250 million between 2013 and 2019, from around 2.4 billion to 2.1 billion). Following the pandemic in 2020, there was further decline in trips made by public transport, particularly among peak hours commuting. This is shown in **Figure D.16**. Over the same period, cycling saw strong growth, increasing from 3.6% of trips in 2019 to 4.5% in 2023.

Figure D.16: Estimated daily trips (millions) by mode, seven-day week average, 2000-23



Streets

D.59 Motorised traffic in London has variety of negative social, environmental and health impacts. Among the most acute of these impacts are the number of people

who are killed or seriously injured on London's roads each year, averaging 3,750 a year between 2021 and 2023. This is a 24% reduction from the 2011-13 average, though recent reductions have plateaued after pandemic-affected years.

D.60 Traffic also generates significant emissions affecting both local air quality and global climate change. Road traffic emissions make up 81% of London's transport carbon dioxide emissions and 58% of London's total carbon emissions. Emissions from traffic have reduced over the last decade but have started to increase again reflecting recovery from the pandemic, up 8% from 2020 to 2022. Measures including the Ultra Low Emission Zone (ULEZ) have contributed to a sharp decline in high concentrations of air pollutants compared to the 2023 scenario without the London-wide ULEZ: average roadside nitrogen dioxide concentrations are down 23% in comparison. Particulate matter exhaust emissions were 17% lower in comparison.

D.61 Despite this progress, London's air remains harmful to human health. The World Health Organisation recently released updated guidelines that recommend a reduction in NO₂ concentrations from the current national air quality objective of 40ug/m³ to 10ug/m³. Average NO₂ concentrations at roadside were 34ugm-3, 29ugm-3 and 36ugm-3 for central, inner and outer London, respectively, in 2023. NO₂, non-exhaust emissions and particulates impact Londoners' health, as do traffic impacts from severance and noise. London's fleet of vehicles is gradually shifting to electric power, which can reduce some impacts. Electric vehicles are expected to make up 49% of London's car and van fleet by 2030, though this means the majority would still have internal combustion engines.

D.62 Car use also affects health through its influence on physical activity levels, and this impacts health and independence into old age. Active travel is the primary source of physical activity for many Londoners and serves as an equitable form of physical activity that can be built into an everyday routine. Walking, wheeling and cycling are considered as moderate to vigorous forms of physical activity, contributing to physical activity weekly guidelines. Walking, wheeling and cycling can also be integrated with journeys to/from public transport hubs for onward journeys.

D.63 In 2023/24, 37% of Londoners report doing at least 20 minutes of active travel on the day they were surveyed, a decline of one percentage point since 2022. In 2013, research showed that Londoners with no car were 10% likelier to achieve that figure, and twice as likely as those living in households with two or more cars. This is partly due to the fact that an average trip in London by car includes less than a minute of active travel, compared to 8-15 minutes by public transport.

D.64 Since 2019, overall traffic levels have fallen across London. Traffic volumes have reduced by the greatest percentage rate (14%) in central London, but outer London traffic reduction (5%) has had the greatest impact (a reduction of 150,000

cars). Although morning peak average excess delay (in minutes per kilometre) is lower in outer London (0.79) compared to central London (1.72), two thirds of London's traffic by distance driven is in outer London, meaning the real impact of traffic reduction in outer London is higher. Despite this reduction, in 2024 alone vehicle congestion cost the capital £3.85 billion, averaging at £942 per driver. Street space is dominated by vehicular movement, and, in many boroughs, large proportions of space are given to residents' on-street parking. On-street parking has been estimated to take up over 14km² of space across London.

D.65 Goods vehicle flows crossing the inner and central London cordons have remained similar between 2021 and 2024. Goods vehicle flows at the outer London cordon have recovered more quickly since the pandemic compared to inner and central London and compared to car flows.

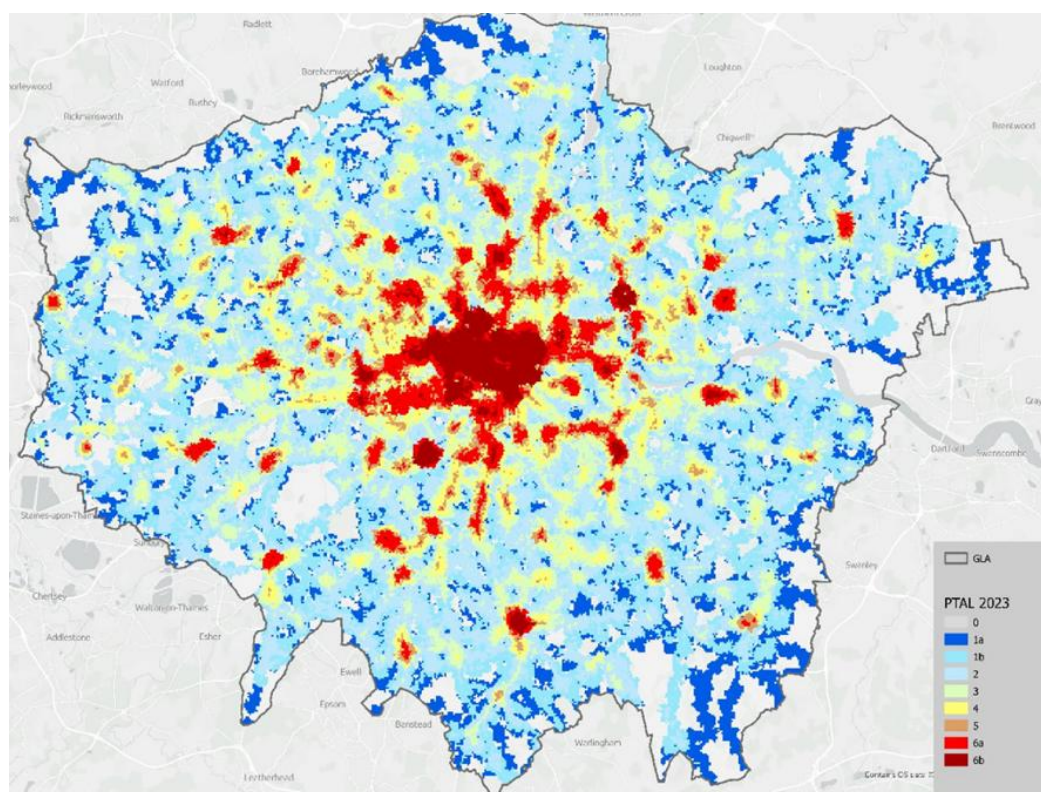
D.66 Other forms of street transport have grown in use since the last London Plan was prepared. Dockless cycle hire companies operate in 23 boroughs and are estimated to have between 48,000 and 60,000 cycles in use. This is 4 to 5 times the number of Santander cycles operated by TfL. However, cycle ownership remains significant: for 2022/23 to 2024/25, only 6% of cycle trips by London residents were made by those without access to their own cycle.

Connectivity and capacity

D.67 London has world-leading levels of public transport connectivity, including to some of the highest concentrations of employment density in the world. Central London in particular benefits from hyperconnectivity, with a large pool of potential workers and customers thanks to its radial rail network. However, there are some imbalances within London: in connectivity between inner London and outer transport hubs and more suburban areas; and between south and north London. The level of connectivity available also varies by who is travelling, with only about one third of the London Underground network providing step-free access.

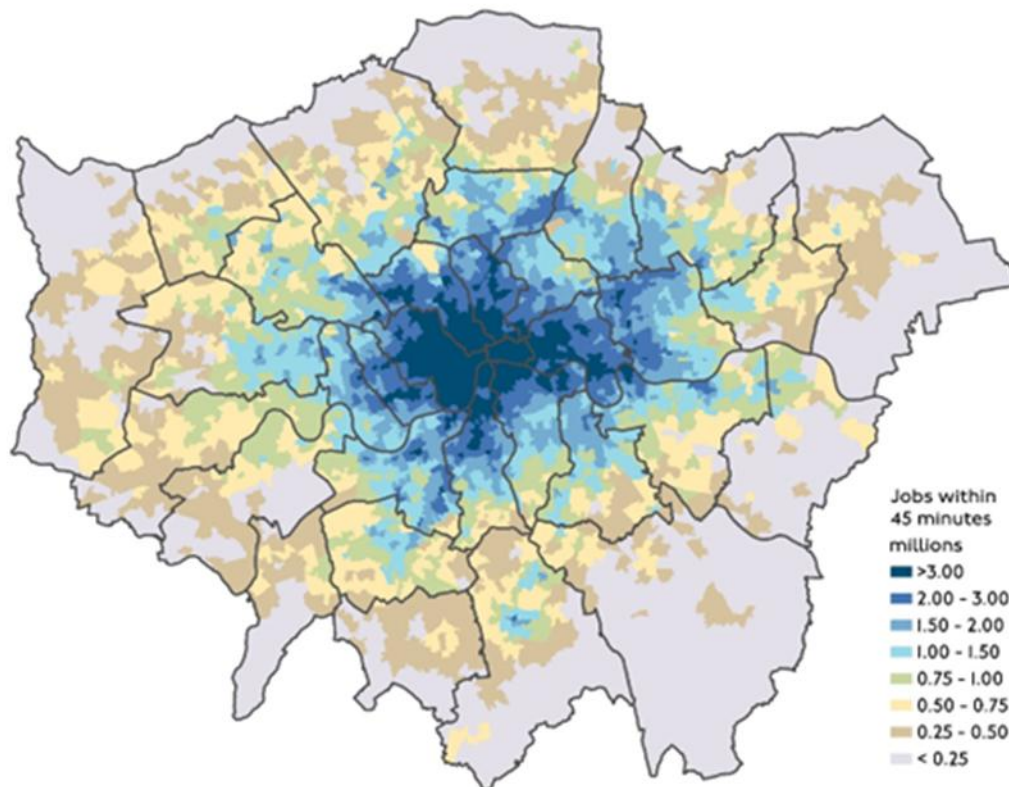
D.68 The Public Transport Access Level (PTAL) metric provides a measure of Londoners' access to public transport (based on how much walking and waiting time is required to access a train, tram or bus). A pattern of relatively higher connectivity towards inner and central London, town centres and along rail lines is visible in the PTAL map shown in **Figure D.17** below [\[See reference 148\]](#).

Figure D.17: 2023 Public Transport Access Levels (Source: TfL Travel in London 2023: Annual Overview)



D.69 TfL is developing a new connectivity metric to complement PTAL that is based on journey times by sustainable modes to useful destinations, not just to public transport services. This should provide a fuller picture of how well connected a place is and better capture the benefits of transport improvements. For example, **Figure D.18** shows the number of jobs that can be accessed within 45 minutes of travel on the public transport network. This produces some similarities to PTAL, but the spatial pattern generally corresponds more closely to distance from employment centres including central London (where there is the greatest concentration of jobs) and travel by rail (which typically goes further in the same amount of time compared to other modes). TfL is also exploring what equity measures could be incorporated into or alongside this.

Figure D.18: Number of jobs within 45 minutes of travel on the public transport network



D.70 London also has several national and international transport connections. There are six airports within a 60-minute journey time to central London. The number of air transport movements (commercial take offs and landing) increased steadily from 2013 to 2019. In 2022 to 2024 flight landing and taking off increased but are still 10% lower than the 2019 peak. There are still over 1 million air transport movements per year. Increased airport operations can worsen air quality, noise and carbon emissions. St Pancras International station provides international rail services. In 2024/25, 186,000 coaches departed from Victoria Coach Station to domestic and international destinations.

D.71 Rail capacity and connectivity have generally improved over the last couple of decades. Examples include the Elizabeth line which opened in 2022 and added 10% to central London's rail network capacity, and the London Overground extension to Barking Riverside, which also opened in 2022. In 2025, central Government committed funding to TfL to extend the DLR to Thamesmead, improving overall connectivity in east London and unlocking new housing.

D.72 Buses provide shorter walking distances, cheaper fares, and greater geographical breadth. Average London bus network speeds have reduced from 9.6

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

D.73 Accessibility is also an important part of connectivity. Currently 93 stations on the TfL network are step free, over a third. In 2023, the reduction (from the 2016 baseline) in the additional journey time of using only the step-free transport network was 37% thanks to the continual programme of step-free stations upgrades. There are nine Tube stations currently shortlisted for the next phase of step-free access work. All buses and almost all bus stops in London are step free.

D.74 London's connectivity is part of why it is much more densely populated than the rest of the country. As with most dense urban areas, people travelling on London's rail network often experience crowding at busy times and locations. Crowding, using the measurement of passenger kilometres travelled on TfL rail services with more than two people standing per square metre, has been sensitive to pandemic demand fluctuations. It decreased from 10% in 2019 to 0% in 2020 but increased to above 3% by 2024. However, this is an average across the week which hides variation between Mondays and Fridays (which have seen particularly reduced demand since 2020) and Tuesdays to Thursdays (where demand has recovered more strongly). It also hides specific bottlenecks in the network used by key routes: these can be complex and costly to resolve.

D.75 Without further investment in capacity on the TfL and National Rail networks, it is expected that crowding will increase with population and housing growth. Modelling indicates that the crowding challenge will be acute on some lines, including parts of the Central, Jubilee, Northern and Victoria Underground lines, parts of the Elizabeth line, and parts of the Windrush and Mildmay Overground lines. Sections of these lines will approach or exceed the standing density threshold of four passengers per square metre, beyond which service degradation can occur. Like the lack of step-free-access, crowding can also be a barrier to travel for some Londoners.

Heritage and townscape

Historic environment

D.76 London is world-renowned for its heritage and built environment which are emblematic of the city and contribute to a strong sense of place and civic pride. This built and landscape heritage provides a depth of character that has immeasurable benefit to the city's economy, culture and quality of life. One of the things that makes London distinctive is the way it combines the old and the new. London's heritage assets and historic environment make a significant contribution to the city's culture by providing easy access to the history of the city and its places. Recognition and enhancement of the multicultural nature of much of London's heritage can help to promote community cohesion. In addition to buildings, people can perceive the story of the city through plaques, monuments, museums, artefacts, photography and literature.

D.77 London's designated and non-designated heritage assets range from the Georgian squares of Bloomsbury to Kew Gardens (Victorian) and the Royal Parks and include ancient places of work like the Inns of Court (medieval in origin), distinctive residential areas like Hampstead Garden Suburb (early twentieth century) and vibrant town centres and shopping areas like Brixton and the West End. This sheer variety is an important element of London's vibrant economic success, world class status and unique character.

D.78 London's designated heritage assets currently include **[See reference 149]**:

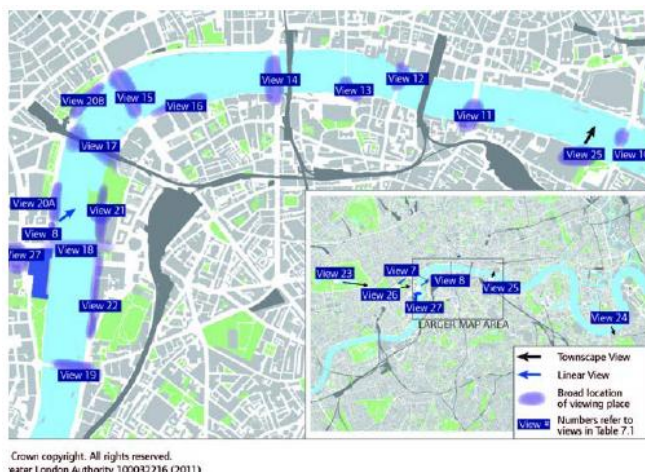
- Four UNESCO World Heritage Sites, including the Royal Botanic Gardens, Kew, Maritime Greenwich, the Tower of London and the Palace of Westminster
- 172 Scheduled Monuments
- 166 Registered Parks and Gardens
- One Registered Battlefield in the London Borough of Barnet
- 19,317 listed buildings
- Over 1,000 Conservation Areas

D.79 The National Heritage List for England and World Heritage Site Management Plans are key sources for information on the above. There are also many non-designated heritage assets which can be found on the Greater London Historic Environment Record, and Archaeological Priority Areas (APAs) where there is significant known archaeological interest or potential for new discoveries. London's

APAs were first created in the 1970s and 1980s either by boroughs or local museums and are in the process of being comprehensively updated. APAs are set out in boroughs' Local Plans.

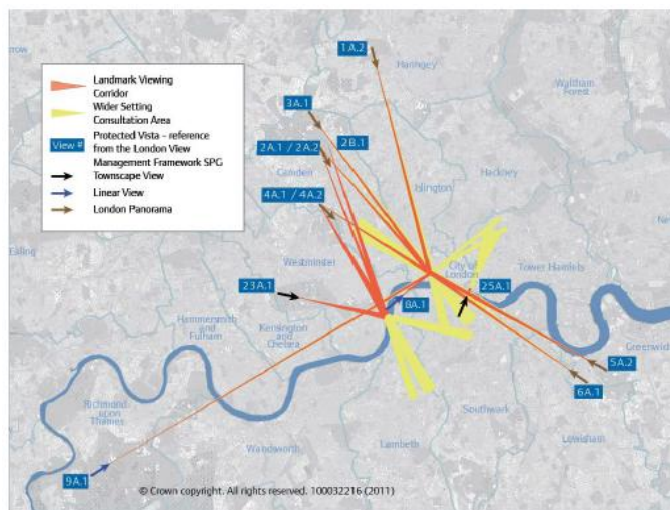
D.80 There are 27 designated views in the London Plan comprising 3 types: London Panoramas, River Prospects and Townscape Views. These views include significant buildings or urban landscapes that help to define London at a strategic level. The Mayor seeks to protect the composition and character of these views, particularly if they are subject to significant pressure from development. New development will often make a positive contribution to the views; however, in other cases development may compromise the setting or visibility of a key landmark. The majority of views are focused along the River Thames.

Figure D.19: River Prospects



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water London Authority 100032216 (2011)

D.81 Within some views, a Protected Vista to a strategically important landmark (St Paul's Cathedral, the Palace of Westminster and the Tower of London) is also defined. These views have stronger protection than the other types of views in that a height threshold for development is defined directly between the viewing point and the strategically important landmark (Landmark Viewing Corridor). In addition to strategic views, London boroughs also define views that are of local importance.

Figure D.20: Protected Vistas

D.82 The amount of heritage at risk provides one indication as to how the historic environment is being managed. In 2024, there were 599 entries on Historic England's Heritage at Risk (HAR) register in London. This makes up 12% of the total 4,891 nationally designated assets at risk. The overall number of assets at risk has stayed relatively consistent over the past 10 years – the London Plan 2014/15 AMR identified 594 assets at risk in London – although this overall number does not reflect assets being removed from or added to the HAR register as their condition changes.

D.83 In terms of decay, acidified air pollutants can accelerate the degradation of valuable buildings, especially cultural monuments such as older sandstone and limestone buildings. Other cultural monuments, such as rune stones and rock carvings, also display evidence of serious damage as a result of acidifying air pollutants.

D.84 London is a very dynamic, complex urban environment in which pressure for development is high. Due to this intense pressure, it is often the setting of heritage assets that are at most risk. Whilst all of London's World Heritage Sites are sensitive to development around them, the location of the Tower of London and the Palace of Westminster in the Central Activities Zone means their settings are under significant development pressures. Recent Technical Reviews from the International Council on Monuments and Sites (ICOMOS) have identified concerns that the increasing number of tall buildings within the setting of several World Heritage properties in London [\[See reference 150\]](#).

Landscape

D.85 The landscape takes its character from a combination of elements, including topography, watercourses, land use and pattern, vegetation, open space and cultural heritage features. Landscapes vary considerably in character and quality and are often considered a key component of the distinctiveness of any local area or region. London is a green city, with almost 50% of London's area being green and blue, and London became the world's first National Park City in 2019. However, the quality of green spaces and levels of access to them varies greatly.

D.86 The Green Belt forms 22% of London's Land area, and 10% of London is designated as Metropolitan Open Land (MOL) within the built environment. This includes spaces such as Richmond Park and Hampstead Heath. Unlike green belt, MOL criteria does involve environmental considerations. London also includes 22 Natural Landscape Areas (NLAs). A Natural Landscape Area is an area which is an original watercourse, contains vegetation typical of the soils and geology of its area and/or allows an appreciation of the wider geomorphology and natural topography of London. These 22 landscape character areas have been brought together into 11 London Local Nature Recovery Strategy landscape areas.

Townscape

D.87 The social, cultural, environmental and economic relationships between people and their communities are reinforced by the physical character of a place. Townscape includes the buildings and the activities and spaces between them. London's historic character is also synonymous with townscape and landscape features, the importance of which is discussed in the preceding Historic Environment section. The London Historic Character Thesaurus facilitates mapping and analysis of historic character in London at a range of scales [\[See reference 151\]](#).

D.88 How well development responds to character plays a key role in determining how successful it is. The scale, form and layout of buildings shape the public realm and create the character and density of an area. Generally, density is related to the scale and height of buildings, although tall buildings do not necessarily have a high density. Density is mainly referred to for housing developments. The current London Plan adopts a character-led approach to identifying area suitable for different levels of change as follows:

- Conserve areas are areas of consistently high quality and coherent character such as conservation areas and designated green spaces (such as MOL and greenbelt). These will include areas that are deemed to be of highly positive

character. In conserve areas, change must be undertaken particularly sensitively to enhance the valued qualities and character of the area.

- Enhance areas are areas of mixed design quality in which moderate change should seek to enhance the overall character of the area.
- Transform areas are areas that have low-quality development of ill-defined character, and where an opportunity exists to establish a newly coherent character.

D.89 Tall buildings can have a significant impact on the surrounding environment, particularly in terms of their impact on the townscape and local micro-climate. They play an important role in delivering the homes, workspace and infrastructure that London needs and also raise strategic issues and can have impacts across borough boundaries. Protected strategic and local views are an important consideration when considering the location and height of tall buildings.

D.90 The public realm is an important feature of the townscape and refers to streets, footpaths, cycle paths, roads, street furniture, public spaces and landscaping etc. Perceptions of the public realm are most commonly related to the maintenance of pavements and roads, the cleanliness of open spaces and the quality of local parks. Other elements which influence perceptions include traffic congestion, road markings, the provision of seating, suitably designed dropped kerbs, signage directions and the extent to which streets are cluttered with signs and street furniture.

D.91 Despite progress, London's built environment still has barriers to the inclusion of all Londoners. The quality and inclusiveness of the public realm has a significant influence on quality of life because it affects people's sense of place, security and belonging, as well as having an influence on a range of health and social factors.

D.92 The design of streets is also an important element in the improving people perception of the public realm. It can encourage active travel including walking and cycling which in turn can improve people's physical activity and helps tackle health issues such as obesity. Attractive streets can also encourage people to socialise and play, building stronger social networks and reducing social isolation, both of which are important for physical and mental health. The provision of shade through trees can help to protect people from sun damage and enables people to cool and regulate their body temperature; and the provision of resting places can help people who have mobility impairments and need places to stop and rest to break up a longer walking and/ or cycle distance.

Housing

Housing stock

D.93 London's housing stock reached approximately 3.84 million homes in 2025, an increase of 10% since 2015. This growth has not kept pace with population growth, which surpassed nine million in 2024, and employment growth, both of which continue to drive housing demand. Housebuilding remains below the London Plan target of 52,000 new homes per year: as of October 2025, EPCs were registered for 27,640 new dwellings, continuing the low delivery trend of 2023 and 2024.

Figure D.21: Indexed trend in number of jobs, people, and homes in London 1996 to 2024 [See reference 152]

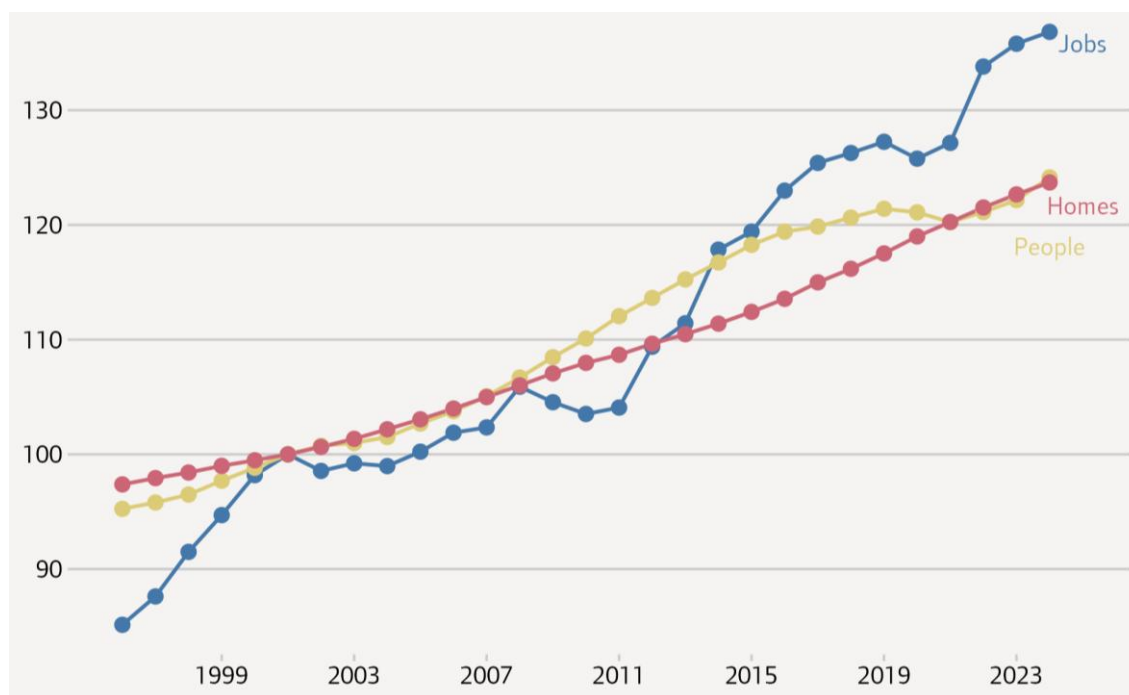
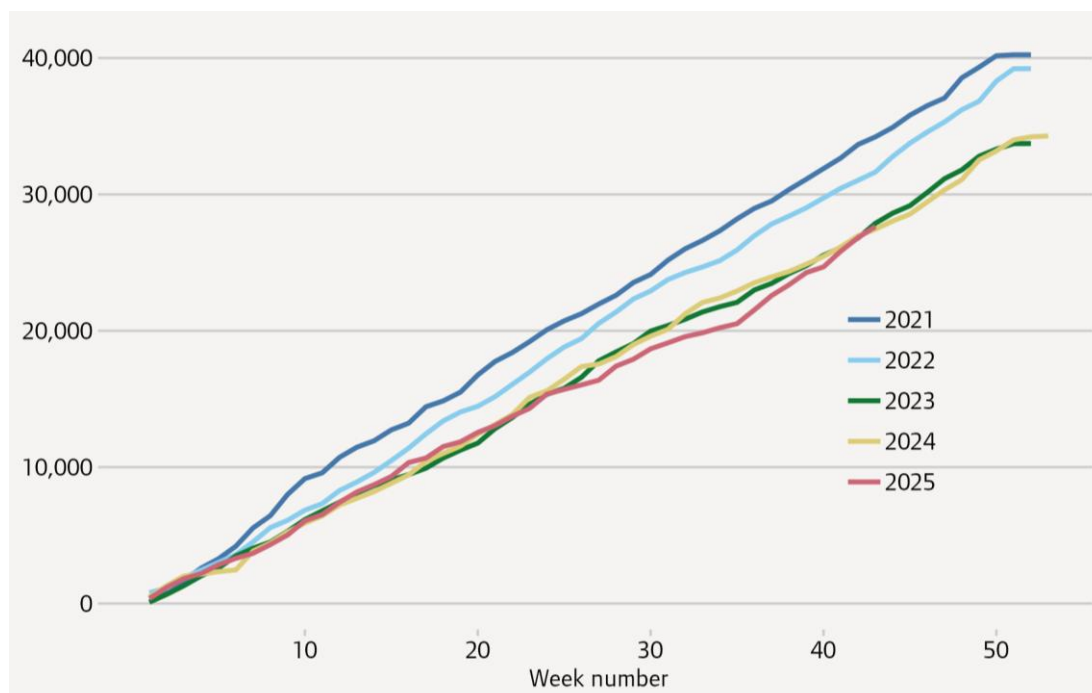


Figure D.22: Percentage change in domestic properties registered for Council Tax as upper tier local authority level, 2015 to 2025 by English region [See reference 153]



Figure D.23: Cumulative weekly Energy Performance Certificates (EPC) for new dwellings in London, 2021 to 2025 (Source: MHCLG)



D.94 Affordable housing delivery has fallen sharply since 2022/23. Starts on housing construction funded by the GLA dropped by 91% in 2023/24 and remain far below previous highs, despite a modest recovery in 2024/25 to 3,991 starts. Completions of affordable homes from all sources reached 13,354 in 2024/25, still 15% below 2022/23 levels. Affordable housing stock stands at 804,000 homes, the highest since 1999, but turnover is historically low, limiting access for new tenants.

Figure D.24: Affordable housing (social rent and London Affordable rent, other Affordable Rent, Intermediate, tenure TBC) starts in London funded by the GLA, 2012/23 to 2024/25

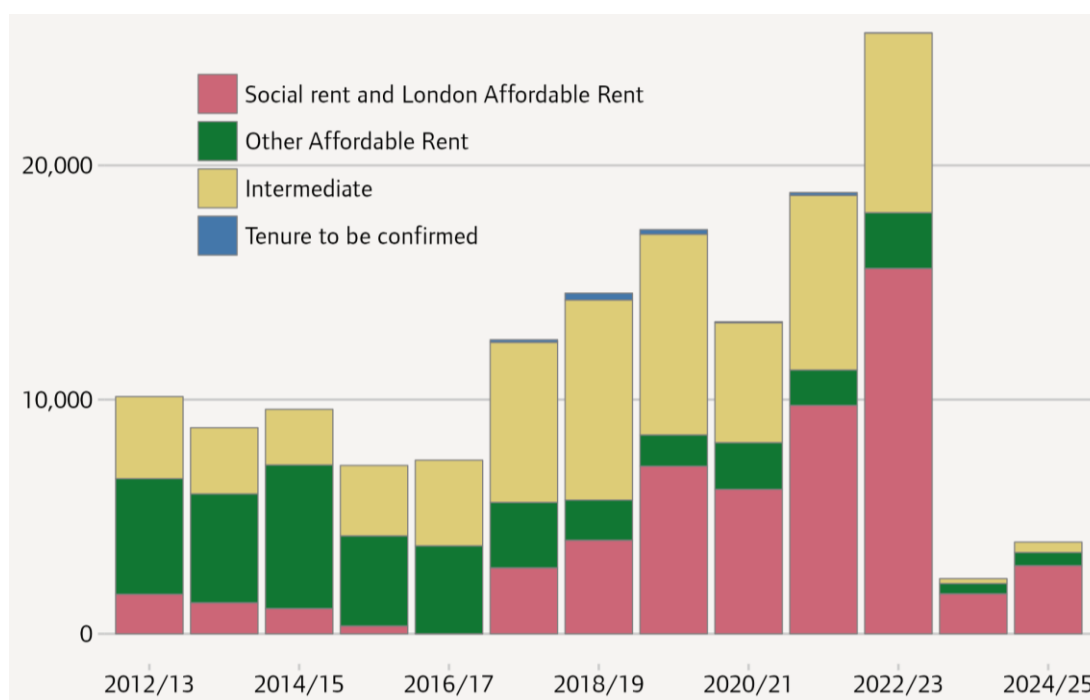


Figure D.25: Total number of council homes started and completed by London Boroughs, 2015/16 to 2024/25 [See reference 154]

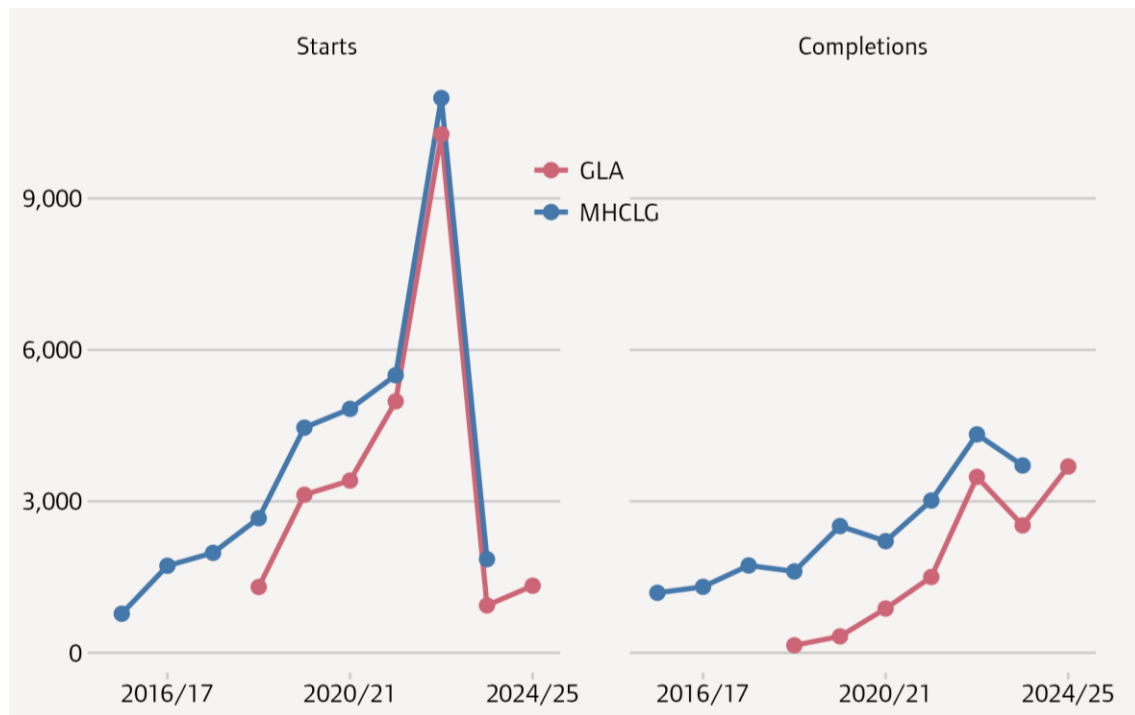
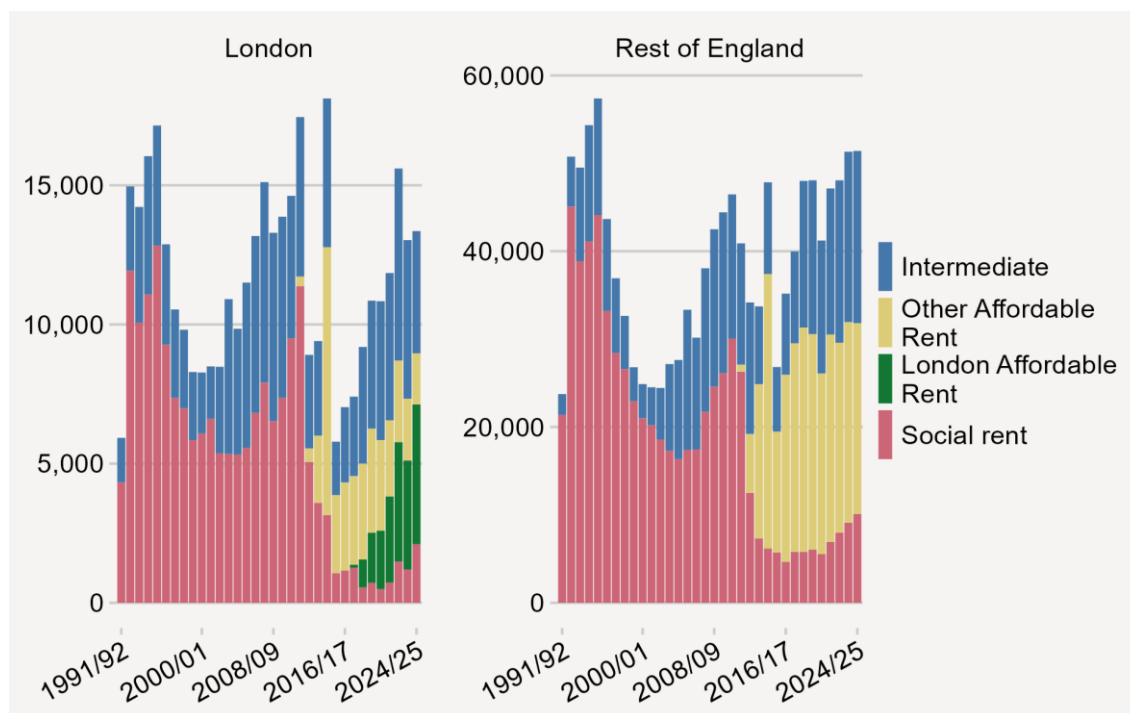


Figure D.26: Affordable housing completions in London and other English regions, all funding sources, 1991/92 to 2024/25 [See reference 155]



D.95 Housing quality remains a concern: 11% of homes in London were below the Decent Homes Standard in 2023, with non-decent homes concentrated in the private rented sector and among older properties. Energy efficiency has improved over time, but only 7.8% of existing homes have an EPC rating of A or B, compared to 86% of new builds. Fuel poverty affected 9.4% of London households in 2024, slightly below the England average.

Figure D.27: Trend in non-decent homes in London as a share of the total in each tenure (private rented, social housing, owner occupied), 2006 to 2023 [See reference 156]

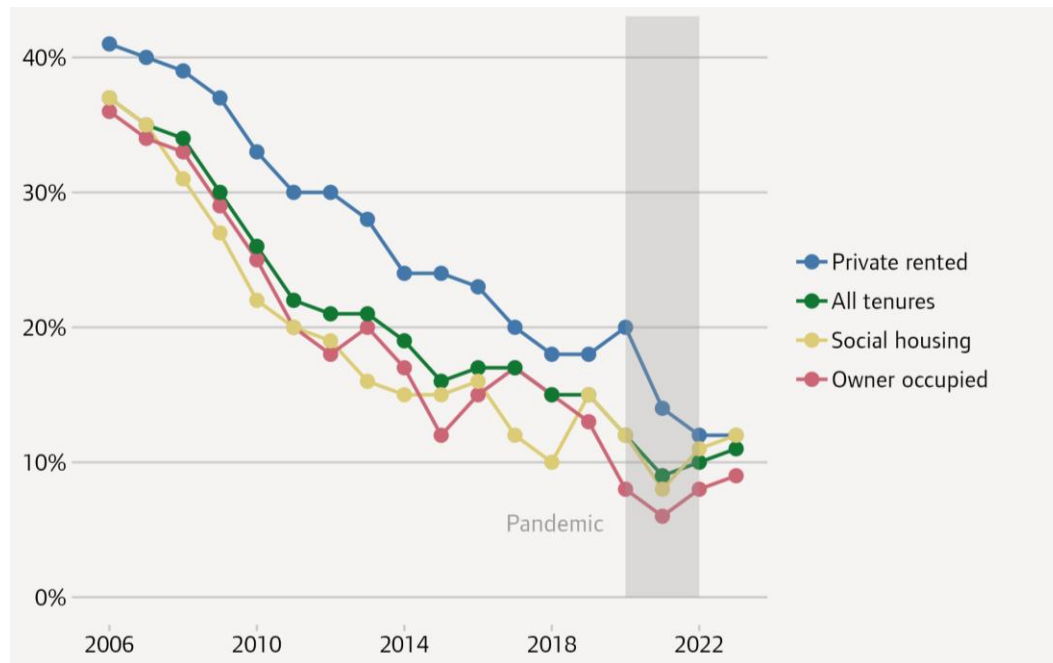


Figure D.28: Energy efficiency band of EPCs lodged for new and existing homes in all English regions, 2012 to 2025 Q2 [See reference 157]

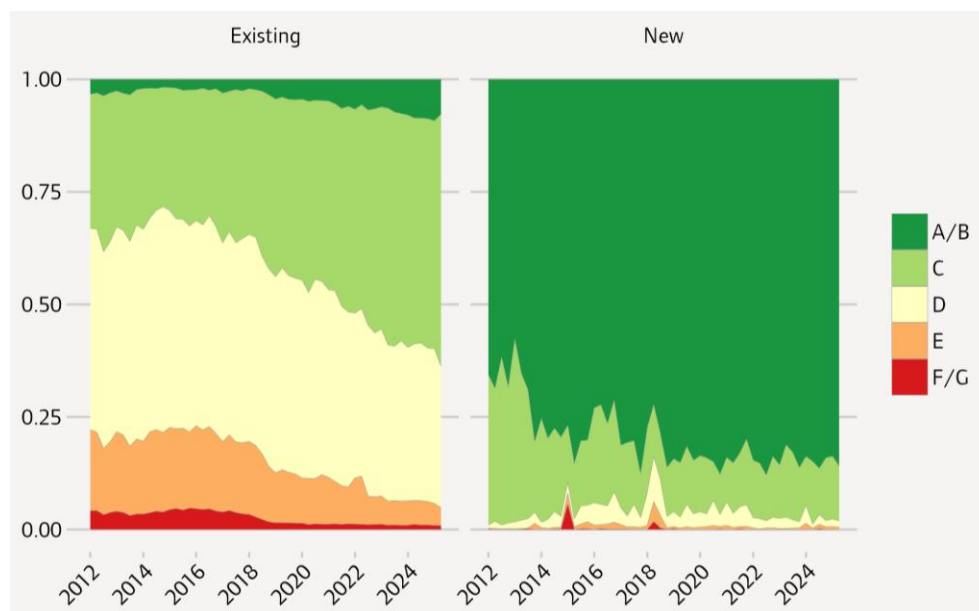
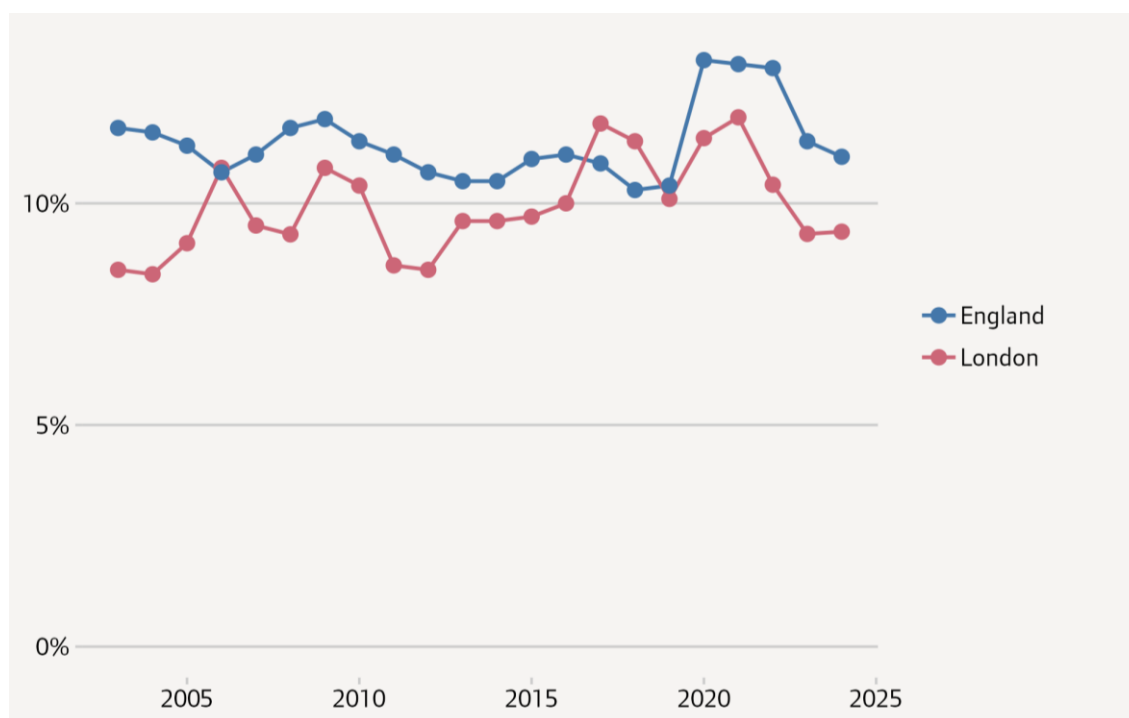


Figure D.29: Proportion of households in fuel poverty in London and England, 2003 to 2024 [See reference 158]



Housing affordability

D.96 Housing affordability is a persistent challenge. Londoners spend a median of 27% of household income on housing costs, higher for households including someone with a disability. The percentage of income spent on housing costs varies significantly by tenure. Londoners living in the private rented sector spend a median average of 34% of their income on housing costs, compared with 28% for Londoners living in social rented homes and 18% owner occupiers.

D.97 Private rents remain far above other regions: the average monthly rent for a two-bedroom home in Westminster (£3,320) is more than twice that in Bexley (£1,420). Homeownership is increasingly out of reach for many: first-time buyers now put down an average deposit of £134,000, and interest rates for new mortgages are nearly three times pre-pandemic levels. However, real house prices are falling, with July 2025 inflation-adjusted average prices down 28% since their peak in July 2016. This might not reflect better affordability for buyers as the price decrease might simply signal lower purchasing power from buyers.

Figure D.30: Median affordability ratio by household disability status and English region, 2023/24 (Source: English Housing Survey)

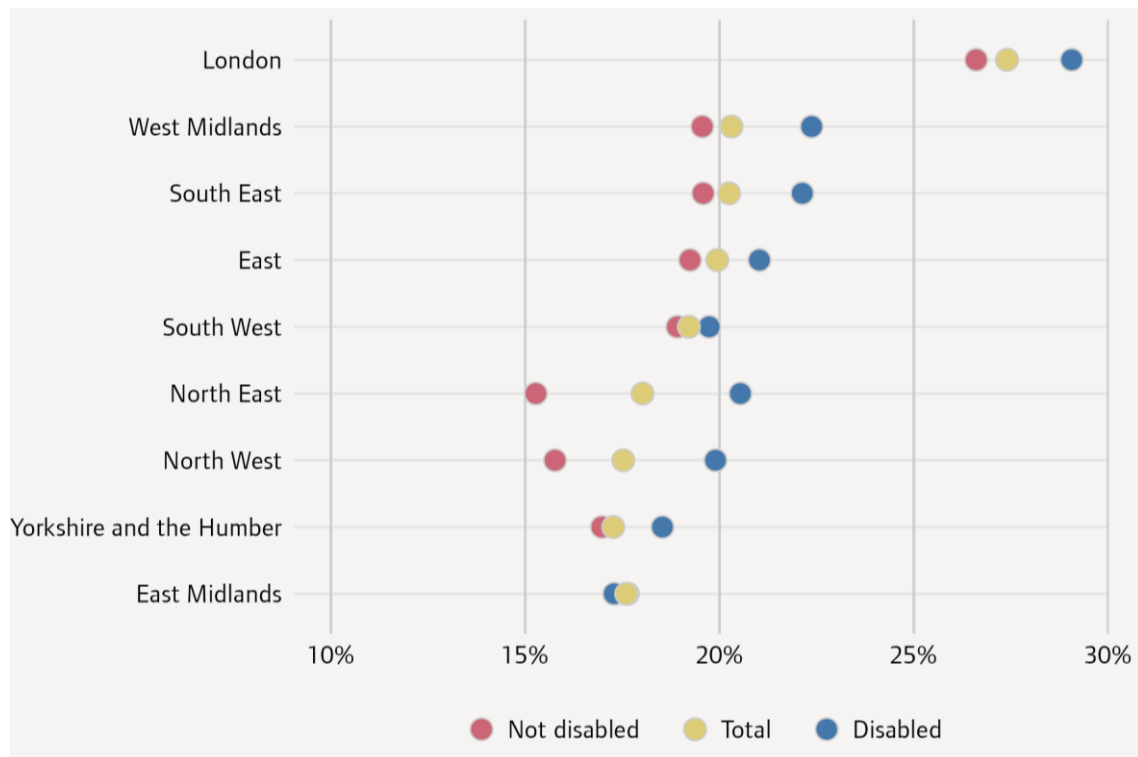


Figure D.31: Average monthly private rent by number of bedrooms and London borough, September 2024 to August 2025 [See reference 159]

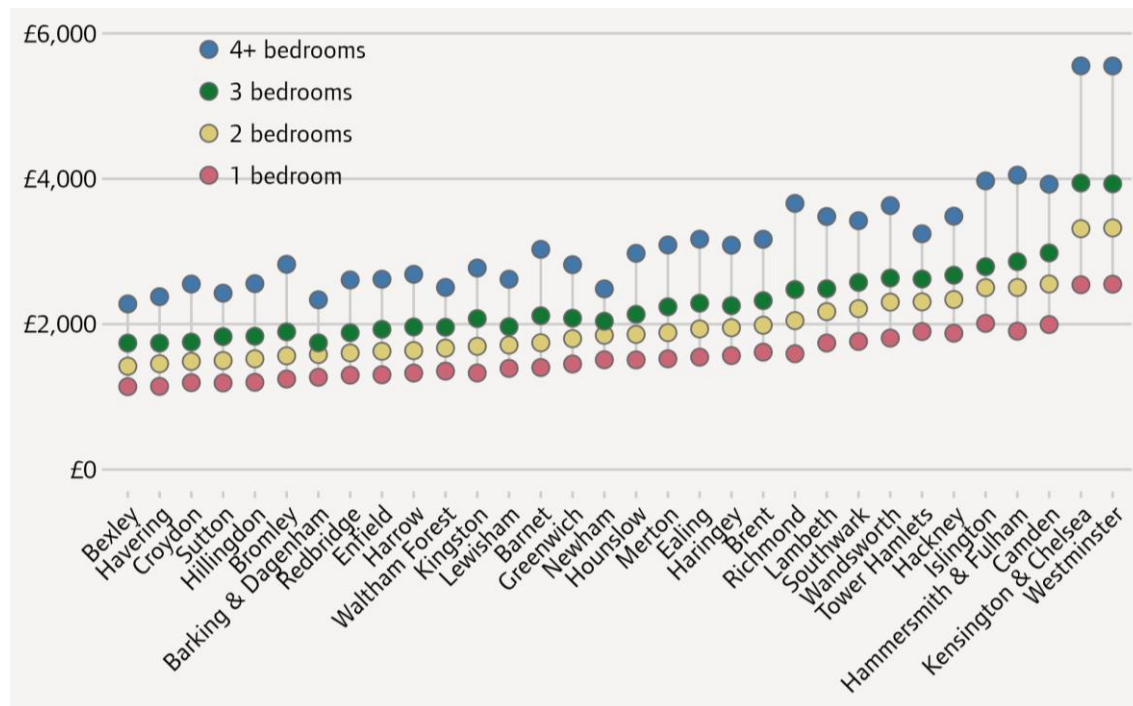


Figure D.32: Gap between mean average price and mean mortgage for first-time buyers in London and England, 1993 Q1 to 2025 Q1 [See reference 160]

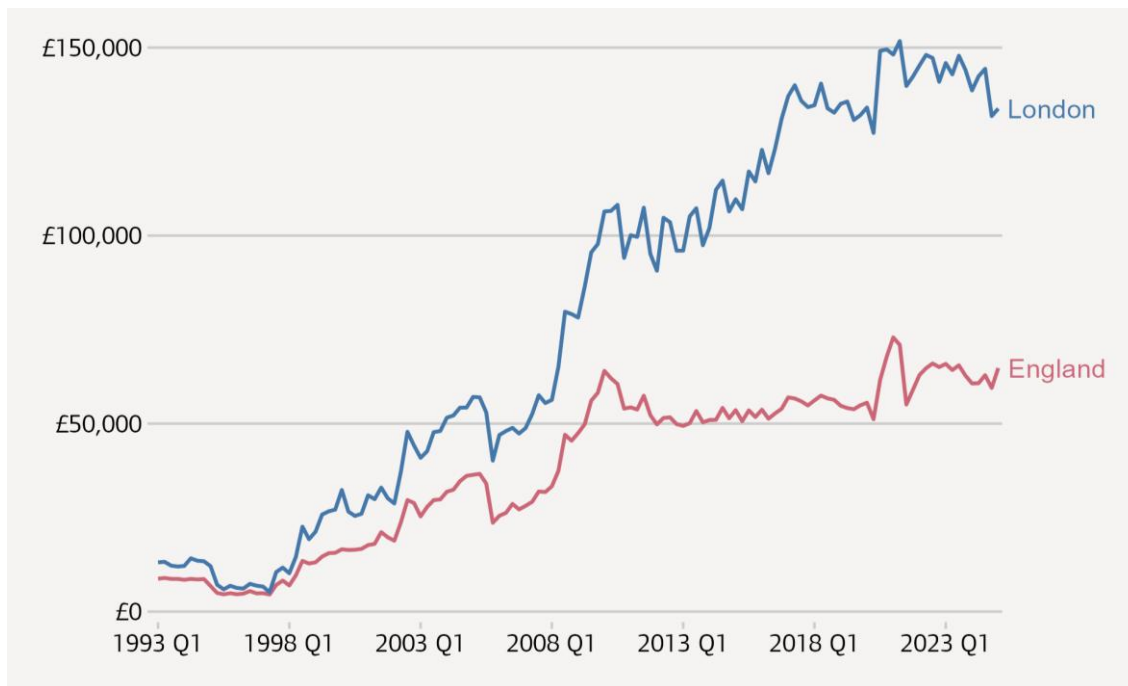
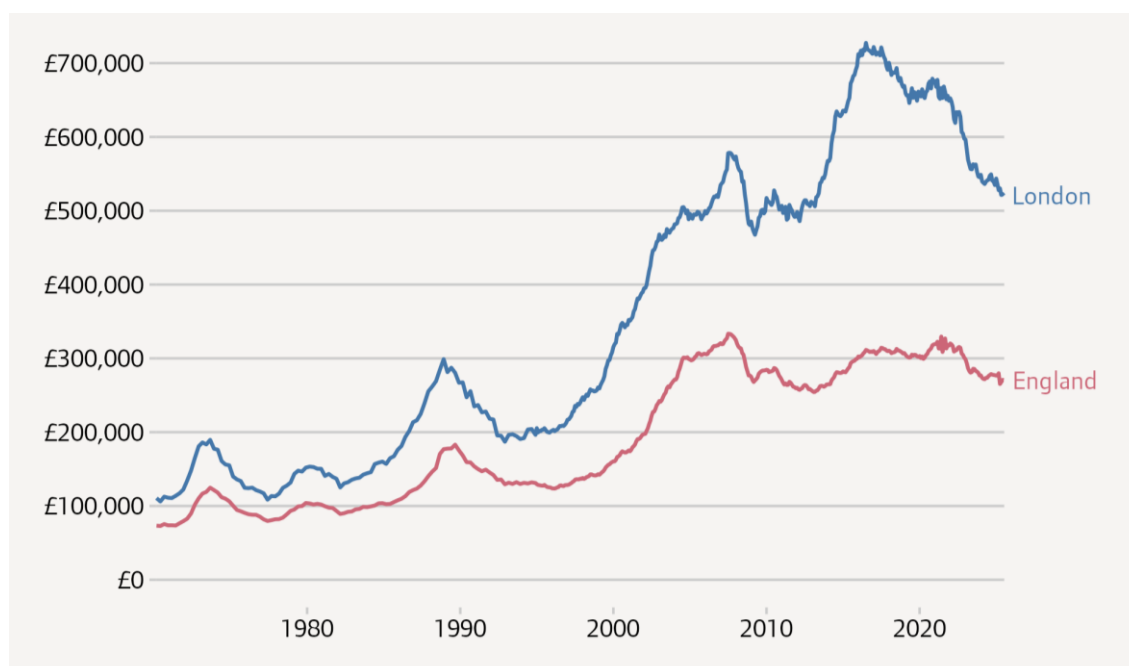


Figure D.33: Average house prices in London and England after adjusting for retail price inflation, March 1970 to July 2025 [See reference 161]



D.98 The differences in the amount of income spent on housing costs for Londoners with shared protected characteristics is partly a reflection of different distribution across housing tenures, and partly a reflection of their different incomes. The English Housing Survey data sets out that in London [See reference 162]:

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

D.99 An ONS survey found that 53% of disabled Londoners find it difficult to afford their housing costs, compared with 44% of non-disabled Londoners [See reference 163]. Most Deaf and disabled Londoners who responded to a survey by Inclusion

London said they struggle to afford housing costs, with a third saying that they had to cut back on food or other essentials to afford housing costs [\[See reference 164\]](#).

Housing need

D.100 Housing need is acute. 73,310 households were in temporary accommodation in March 2025, the highest on record, including nearly 95,000 children. Rough sleeping also reached record levels, with 13,231 people seen sleeping rough in 2024/25. This represents a 10% increase compared to the total of 11,993 people seen in 2023/24. Overcrowding affects 6.7% of households, with higher rates in social and private rented sectors.

D.101 The GLA's needs assessment for accommodation-based support for victims/survivors of domestic abuse found that, since 2020/21, the number of households in London owed a prevention or relief duty from homelessness as a result of domestic abuse has increased by 15%. Over the past three years, the London-wide increase in households seeking homelessness relief has outpaced the increase in those seeking homelessness prevention. This suggests that the needs of those requesting housing support due to domestic abuse are increasingly acute by the time they come to the attention of local authorities. Demand for housing support among survivors that are rough sleeping has also risen since the COVID-19 pandemic. The GLA's needs assessment identifies areas of unmet need [\[See reference 165\]](#).

D.102 The GLA Mental Health Specialist and Supported Housing (MH SSH) Research Report has identified a large gap in terms of people who require MH SSH and the number of identified units across London. Conservative estimates show 7,500 placements over 5,199 units, as a result of placements made outside of London and in services that do not specialise in mental health. Due to increasing mental health needs, lack of affordable housing and rising levels of homelessness, challenges in accessing community healthcare, and vulnerability as a result of increased levels of co-occurring conditions, the report estimates an 11% increase in need in the next 10 years.

D.103 Based on GLA analysis of English Housing Survey data from 2018-2022, 17% of homes in London have all four basic accessibility features necessary to make them 'visitable' by someone with mobility difficulties. However, less than 1% are 'visitable' while also having the accessible bathrooms, kitchens and lift access that a disabled household might need. 11% cent of households in London with disabled members say they do not feel safe at home because they fear a fire might break out, compared to around 8% of households with no disabled members. One in four Deaf and disabled Londoners who responded to an Inclusion London survey said that their

home is completely inaccessible, meaning that they cannot safely and easily use basic facilities like kitchens, bathrooms and entryways [\[See reference 166\]](#).

Figure D.34: Homeless households placed in temporary accommodation by London boroughs by type of accommodation (bed and breakfast, hostels and women's refuges, social housing, leased from private section by social housing landlord, other private sector accommodation [\[See reference 167\]](#)

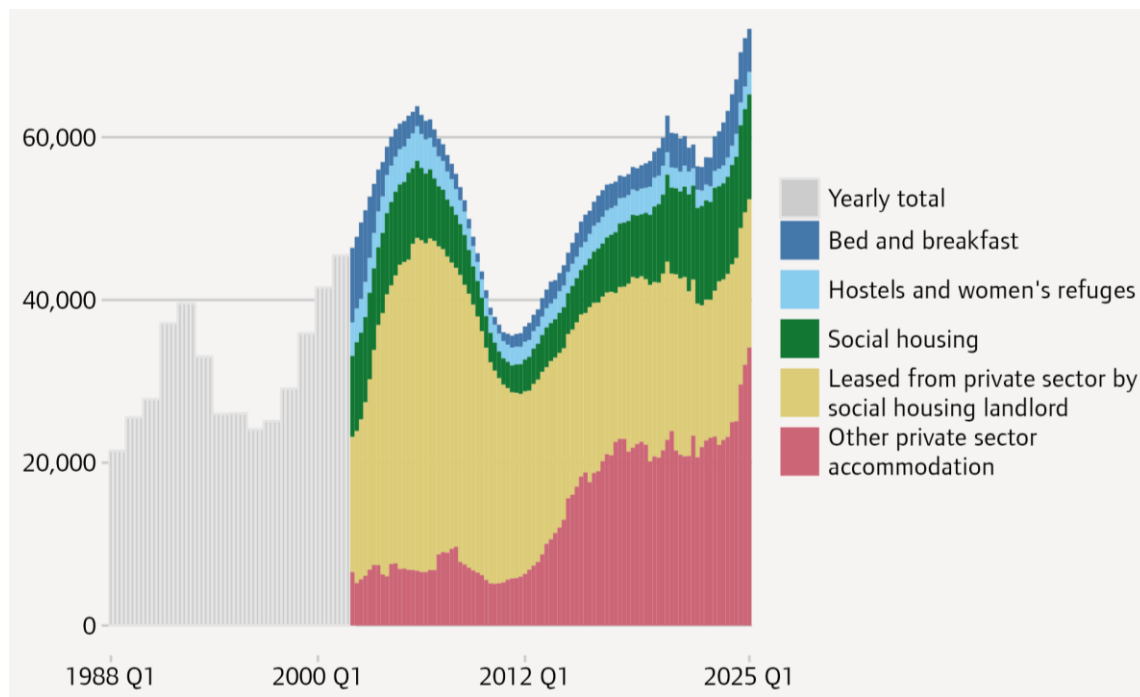


Figure D.35: People seen sleeping rough in London, 2005/06 to 2024/25
(Source: Combined Homelessness and Information Network (CHAIN) annual reports 2005/6 to 2024/25)

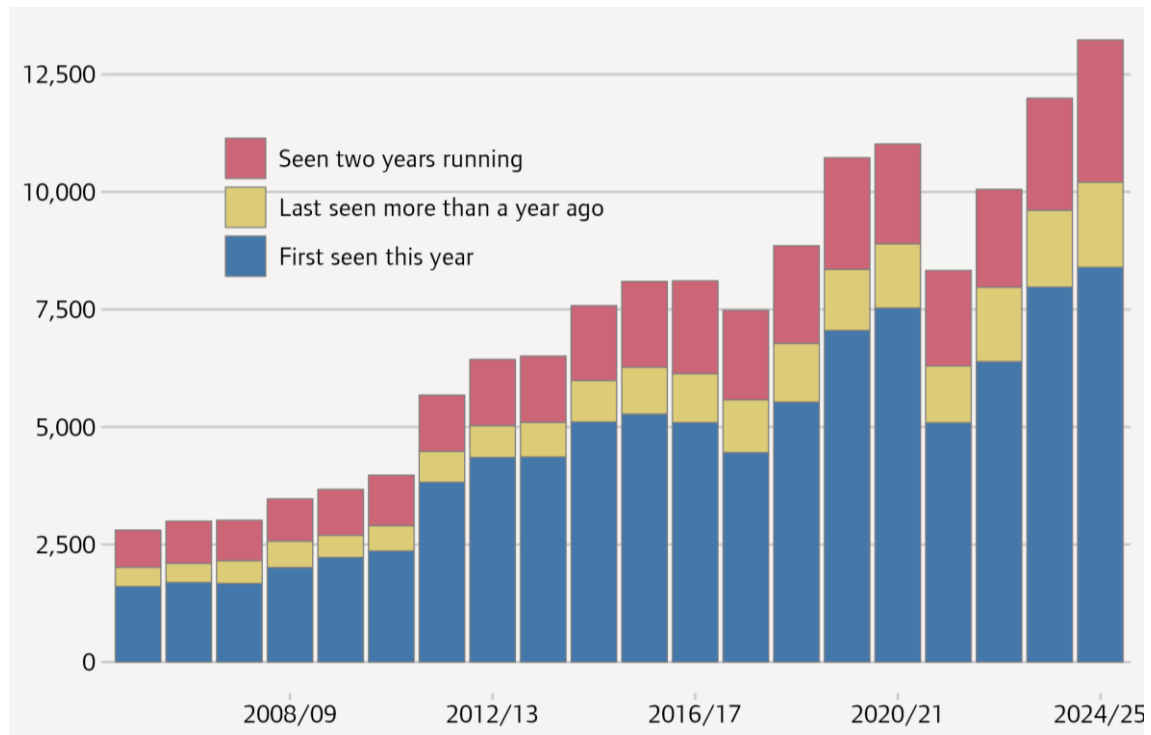
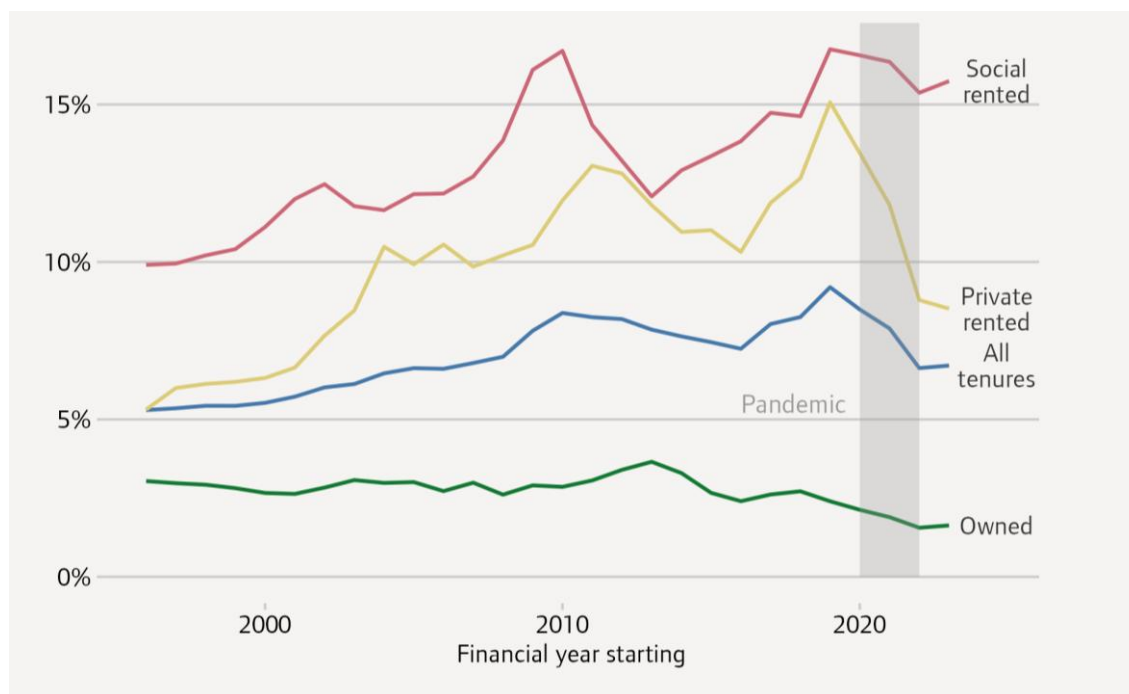


Figure D.36: Proportion of households in London overcrowded according to the bedroom standard by tenure (social rented, private rented, owned), 1996/97 to 2023/24 [See reference 168]



Gypsy and Traveller accommodation

D.104 There is an urgent and unmet need across London for site and pitches for London's Gypsy and Traveller communities. In 2024/25, 3.7% of Londoners seen rough sleeping identified as White- Gypsy/Irish Traveller, White- Roma, or Gypsy/Romany/Irish Traveller. In contrast, Census 2021 data estimates that approximately 0.5% of Londoners identified as Gypsy or Irish Traveller, or Roma. While a proportion of London's Gypsy, Roma and Traveller communities have a preference for bricks and mortar accommodation, the provision of Gypsy and Traveller sites in London falls considerably short of demand and much of this need is for social rented pitches. The London-wide Gypsy and Traveller Accommodation Needs Assessment (2025) identifies a need for 861 permanent pitches over the ten-year period from 2022/23 to 2031/32.

Economic potential and employment

London in the global and national context

D.105 London is the largest city in western Europe and accounts for around 25% of UK economic output. While the UK economy shows signs of stabilisation following the peak of the cost-of living crisis, significant uncertainty remains especially around US trade policy. This reflects ongoing global geopolitical tensions, trade disruptions, lingering inflationary pressures, and weak productivity growth [\[See reference 169\]](#). Despite ongoing risks, London continues to outperform the national average based on its global economic ties, high-value service sectors, and above-average productivity levels.

D.106 London also continues to perform highly in indices of global city comparisons, a reflection of sustained interest in the capital as a coveted economic, social and cultural destination. The city remains the UK's most productive region and a global hub for finance, technology, and culture. However, there are long-standing structural challenges. Economic output is growing, but productivity has faltered. While labour market participation is high, job quality is uneven and income inequality remains pronounced – the richest tenth of Londoners have almost nine times the income (after accounting for housing costs) of the poorest. London's housing affordability problem represents a significant structural barrier to long-term economic growth – high housing costs constrain Londoners' discretionary spending and increase their financial vulnerability. Between 2002 and 2021, median house prices grew twice as fast as wages in London.

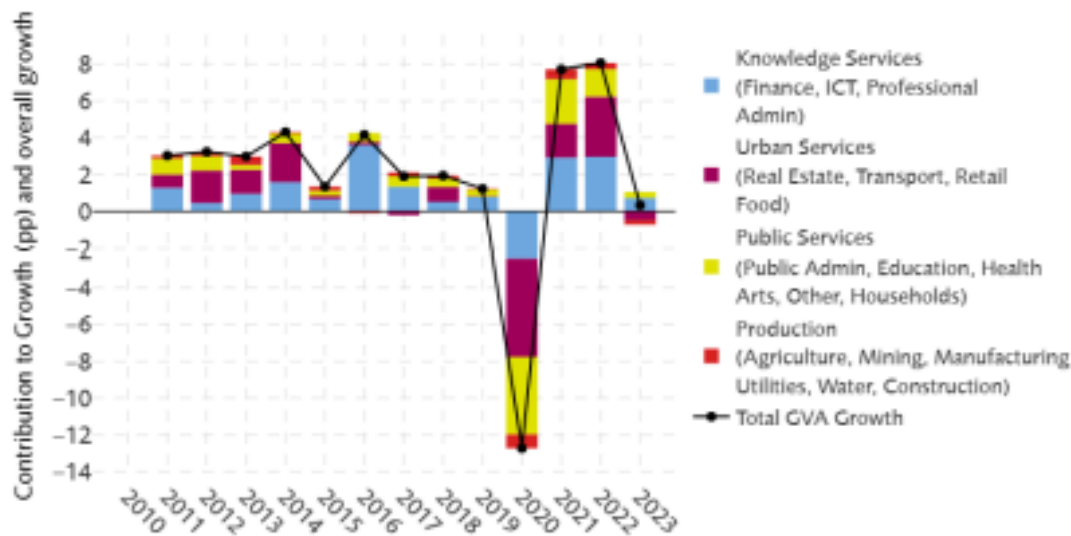
D.107 London's role as a gateway to international markets is underpinned by the location and capacity of its airports. Airports in themselves are significant catalysts for growth. Through their multiplier effects they facilitate direct and indirect employment, making an important contribution to their local economies, being major employers in their own right and attracting companies whose business depends on air travel into their immediate proximity, as well as through their wider supply chains. Their connectivity and accessibility through their supporting physical infrastructure also facilitates greater business opportunities to the wider UK economy, spreading their multiplier effects further as well as supporting the tourism industry.

Economic growth, productivity, and sectoral performance

D.108 Economic growth benefits people in many ways, most importantly through job creation, rising wages, and improvements in living standards. London's economy rebounded strongly directly after COVID, but growth has generally been modest.

High value industries such as tech, finance, and education have driven in the rebound. This cooling of GVA growth in the past two years is not unique to London but rather reflects the trend of national growth. In 2023 and 2024, London and the UK grew at a similar pace.

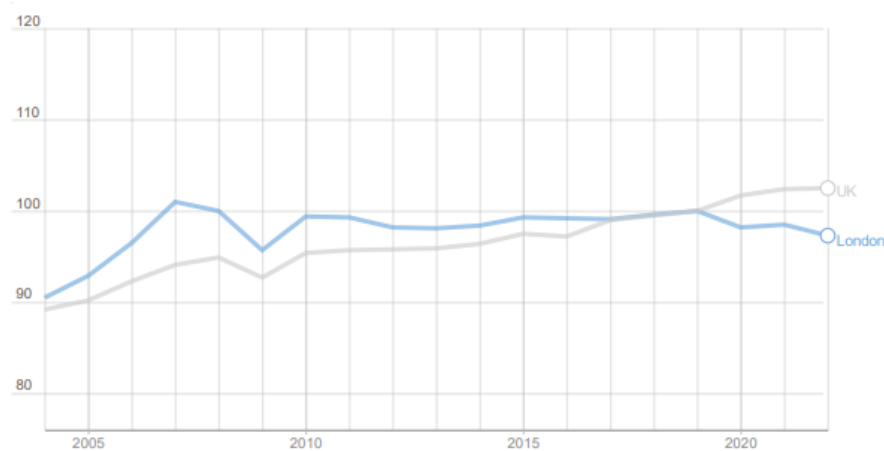
Figure D.37: Annual growth contribution by broad industry classifications
(Source: GLA analysis of ONS regional GVA data)



D.109 Productivity – measured in **Figure D.38** below by GVA per hour worked - is a key driver of economic growth. There has been a general flatlining of productivity in London following the 2008 financial crisis, and sharp falls since 2019. GVA per hour worked in the capital actually declined by 2.7% between 2019 and 2022, against the national picture of an increase of 2.5% over the same period. Despite this, London remains the UK's most productive region, with GVA per hour worked 26% higher than the UK average in 2022 (£51.70 versus £41.00).

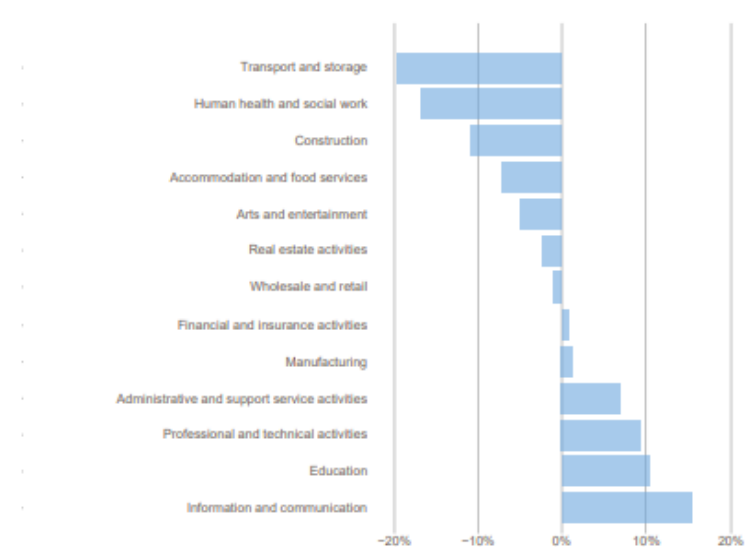
D.110 London's falling productivity is driven by a combination of factors including but not limited to chronic business underinvestment, unaffordable housing and reduced national public and private expenditure on research and development compared to better-performing G7 economies (London Growth Strategy). It reflects sectoral composition effects, with London's services reliant economy more severely disrupted by the pandemic. Additionally, the rise of remote and hybrid work is thought to have impacted London's traditional agglomeration advantages – the productivity benefits that co-located, interconnected industries experience [\[See reference 170\]](#).

Figure D.38: London’s productivity, measured by real GVA per hour worked (Source: ONS regional productivity)



D.111 The economic recovery post pandemic has been uneven across sectors. High-value sectors (such as information and communications, education, professional and technical services) have generally outperformed, while sectors that rely on physical interaction have lagged. In contrast, sectors dependent on physical interaction have seen weaker recoveries. Transport and storage remains nearly 20% below its 2019 level – the largest decline among all industries. Accommodation and food services, arts and entertainment, and human health and social work also remain below pre-pandemic levels, reflecting (in part) persistent structural and behavioural shifts. In non-service sectors, construction output remains nearly 11% lower than in 2019, while manufacturing has increased slightly.

Figure D.39: Changes in economic output by industry, measured by percentage change in real GVA by industry in London 2019 to 2023 [See reference 171]



D.112 Historically, the number of business births has exceeded closures, which London's economic dynamism. From early 2022 to mid-2023 the situation was reversed with more business closures than births, however throughout 2024 births have remained above closures with more enterprises entering the market than existing. A similar trend was observed across the UK, although London recovered sooner, underscoring the city's strong business resilience.

D.113 The agglomeration benefits of being based in London are a key feature of its success, and specialist clusters are an important aspect of London's economy - clustering sectors in places drives productivity and growth. London is one of the worlds' two global financial centres and dominant in professional and business services, and Europe's leading city for tech. In recent decades, alongside established areas in the Square Mile and West End, significant new clusters of growth in London have been established at Canary Wharf on the Isle of Dogs; in the Knowledge Quarter around King's Cross; in the east of the centre around Old Street, Clerkenwell and Shoreditch; south at Battersea, London Bridge and the South Bank; and west at White City.

D.114 The regeneration delivered by the 2012 Olympic Games created a new economy in Stratford and Hackney Wick. London also has significant commercial office clusters in outer centres like Croydon, Ealing and Kingston. Different sectors cluster in different patterns and many of London's growth sectors cross the boundary of Greater London. For example, life sciences tend to cluster in a tight walkable neighbourhood around universities and hospitals, and London's life sciences sector is part of the Golden Triangle with Oxford and Cambridge. The film and TV production sector is clustered around a string of major studios across west London and into neighbouring Hertfordshire and Buckinghamshire.

D.115 London's infrastructure capacity constraints limit growth. Many parts of the tube and rail network suffer significant crowding during peak periods. Energy supply pressures are particularly pronounced in London due to the increasing concentration of data centres and digital infrastructure. Infrastructure constraints create direct productivity drags through increased transport costs, input costs, and time losses while constraining London's ability to accommodate new firms and future growth. Labour market inefficiencies intensify, and agglomeration benefits are eroded. When congestion costs (both in terms of time and money) and input costs exceed agglomeration benefits, London's competitive edge is undermined. The cost of business space in London is substantially higher compared to elsewhere, and affordability can be a particular issue for smaller and start-up businesses, and for social, creative, and cultural enterprises.

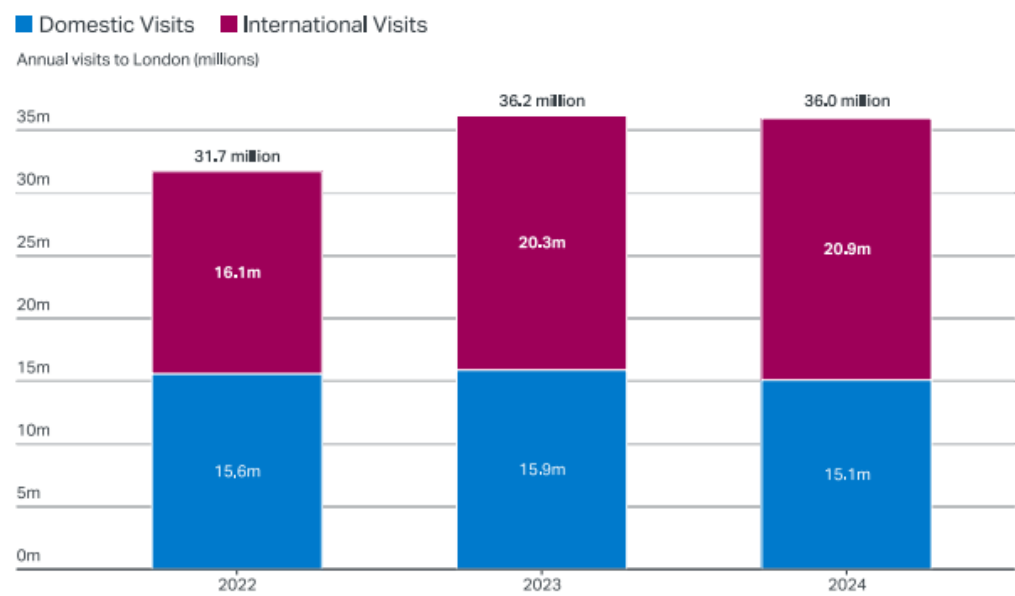
D.116 While hybrid and flexible working patterns have become normal in many sectors, uncertainties remain about the impact on the agglomeration of activities in London and the demand for infrastructure. ONS data from 2023 indicates that London residents report the highest levels of hybrid working across Great Britain, with 4 in 10 workers both working from home and travelling to work [\[See reference 172\]](#).

D.117 Workers in the highest income band, those who were educated to degree level or above, and those in professional occupations were most likely to report home only or hybrid working. Younger workers aged 16 to 24 years had the highest rate of those travelling to work at 79%. There was little difference between the proportions of women and men reporting to be hybrid working. Disabled workers reported similar levels of homeworking only compared with those without a disability. Some slight differences were seen between ethnicities. Workers in the Black or Black British ethnic group reported the highest levels of travelling to work without the option to work from home (60%), compared with workers in the White British/Irish ethnic group (46%).

D.118 Culture and the creative industries contribute around £50bn to London's economy every year and account for one in five jobs in the capital. It includes a range of uses and activities such as music and performance venues, visual arts, fashion, film, design, crafts and making, cinemas and museums. Many Londoners and visitors also experience culture through London's public spaces and diverse communities. London has a thriving creative industries sector and is a leading global exporter in the creative industries. London's 12 Creative Enterprise Zones support affordable workspace for creative businesses and help local people develop skills and access employment in the sector.

D.119 The number of international visitors to London has recovered strongly from the pandemic, and at the same time domestic visits remained resilient. Together, these trends suggested sustained interest in London as both an international and domestic tourism destination. The total nights spent in London increased from 140.7 million in 2022 to 156 million in 2024 (Source VisitBritain). Most of the top ten visitor attractions in England are in London and occupy listed buildings, and all four of London's World Heritage Sites are in the top 20 visitor attractions [\[See reference 173\]](#).

Figure D.40: Domestic and international visits to London 2022, 2023, and 2024
(Source: Visit Britain)



D.120 London’s night-time economy is a key element of London’s culture. On a typical night there are over two million visitors out and about in the capital between 9pm and midnight, and the capital have over five times as many 24-hour licensed premises than any other city in the UK. London’s top 20 hotspots for night-time activity are spread across 16 London boroughs, and more than half are outside the Central Activities Zone.

D.121 London’s Low Carbon and Environmental Goods and Services (LCEGS) sector was worth £54.9 billion to London’s economy in 2023/24, based on the value of sales in the sector [See reference 174]. This was generated by over 20,000 businesses that employed over 341,100 people in the reporting year. Historically, the LCEGS sector has a higher growth rate in London than the UK. The five largest sub-sectors are carbon finance, wind, geothermal, buildings technologies, and alternative fuels.

Labour market, jobs and earnings

D.122 Jobs growth has outpaced London’s working age population growth over the last 20 years. Workforce jobs were 6.4 million in 2024, an increase of 1.7 million in 20 years (Source ONS Workforce Jobs and Annual Population Survey). The latest ONS Workforce Jobs data indicates the number of jobs has grown beyond pre-pandemic levels by the growth rate remains below the pre-pandemic trend. The growth was driven by broad-based growth across all sectors, with particularly strong growth in

jobs in the knowledge-intensive service and public service sectors. Sectoral changes in workforce jobs have had similar shifts to those in sectoral output shares.

D.123 Between December 2024 and February 2025, London's employment rate fell by 1.4%, according to the ONS Labour Force Survey. This is an "Official Statistic in Development" and should be treated with caution due to data quality concerns since mid-2023.

D.124 The proportion of working age population without qualification has been falling slightly over time. ONS data show that 5% of the 16-64 population in London holds no formal qualifications, compared to 7% in 2015. Compared to the UK average, London's working age population is relatively highly qualified. In 2023, three-quarters (75%) of 16-64 year old Londoners held a Level 3 or above qualification (equivalent to two A level qualifications or higher, including degrees), higher than for the UK overall (68%).

D.125 Youth unemployment in London (16- to 24-year-olds) is consistently higher than pre pandemic levels and has been rising. The ONS (2023) estimated that 14.6% of Londoners aged 16 to 24 were not in education, employment, or training (NEET). This is higher than the rate for England.

D.126 Recent years have seen significant shifts in the supply of labour at all skill levels. Brexit led to significant changes in London's migration patterns and led to labour shortages in key sectors such as construction and hospitality. Tighter immigration rules coming into force, including changes to visa eligibility and family accompaniment, may reduce the supply of workers in industries such as health, construction, and hospitality. Despite higher net migration than before Brexit, businesses consistently say that lack of skills and talent is the biggest barrier to growth [\[See reference 175\]](#).

D.127 In July 2025, London's employment rate stood at 74.9% and its unemployment rate was estimated at 6.2% (GLA Economics – London Labour Market Update July 2025). While the employment rate is high by historical standards, there is variation in the quality of jobs held by many Londoners. GLA Economics job quality score examines various dimensions of job quality such as pay, contract type, hours, and progression along with an overall 'average job quality score'. This suggests a slight decline in job quality since 2020. According to ONS Labour Force Survey data, approximately 57% of employed residents report positive opportunities for progression, and nearly one in five cite irregular or insecure working hours. Around a third of workers regularly perform unpaid overtime.

D.128 The job score is lower for London than the UK, and the largest contribution to the gap comes from the difference in the share of employees in low pay. While

incomes are higher in London, so is income inequality. In-work poverty is a growing problem in London. There are twice as many Londoners in poverty in working households than in workless ones. Research by the Social Market Foundation found common problems and drivers of low earnings, insufficient hours, high and rising living costs (especially housing), and caring responsibilities [\[See reference 176\]](#). The London Living Wage (LLW) rate is calculated annually based on actual living costs and is currently set at £14.80 per hour.

D.129 Pay gaps exist because one group is paid, on average, less than another group. As with the UK, London evidences gender, ethnicity, and disability pay gaps. The gender and ethnicity pay gaps have been narrowing over time in both geographical areas [\[See reference 177\]](#).

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

D.130 A quarter of London's workforce (1.32 million people) regularly work at night (between 6pm and 6am). While four in five workers in nighttime industries receive at least the LLW, they remain more living on average to be paid below the LLW than those in other industries. Over a third of young workers work nights: 34% of workers aged 16-20 were night workers in 2023, while the share was 38% for those aged 21-25 [\[See reference 178\]](#).

Key locations

D.131 London's economic activity is primarily focused in the Central Activities Zone, town centres, high streets, and industrial areas in terms of the provision of physical floorspace needs. Notwithstanding this, economic activity takes place in a range of settings including public sector, social and community facilities which tend to be located within the neighbourhoods they serve, within people's homes, and at a range of on-the-job locations such as construction and many trades.

D.132 The Central Activities Zone (CAZ) comprising the Square Mile, West End and Northern Isle of Dogs (Canary Wharf) is a dense mix of global financial centre, globally significant visitor destinations, world-class culture and office space. It contains a unique concentration and mix of business, cultural, shopping and entertainment uses. It includes places like the West End, Oxford Street, the City of London, South Bank and Knightsbridge. Around a third of London's jobs are within the CAZ. Together with the Northern Isle of Dogs, it generates more than 11% of the UK's economic output. These areas are also home to almost 300,000 residents.

D.133 London's largest agglomerations of office functions are located within the CAZ including the Northern Isle of Dogs, complemented by diverse office markets in town centres across the capital alongside a range of urban business parks. Since the pandemic, demand (take-up) for office floorspace in Central London was back to the 10-year average level in 2022, whilst falling back slightly in 2023. In town centre office markets outside of CAZ, vacancy rates have increased since the pandemic, most notably in Hammersmith, Croydon and Ealing town centres. With office vacancy rates of around 5%, Kingston and Stratford town centres appear to have been impacted by the pandemic to a lesser degree.

D.134 Looking towards future prospects, agents report [\[See reference 179\]](#) that the 'flight to quality' (when businesses choose fewer but higher-quality, better-located, more sustainable offices) will sustain demand for the best offices in London, particularly as the requirement for buildings with strong environmental credentials increases together with occupiers adapting to more flexible working arrangements following the pandemic. With fewer new builds expected in the short term, more refurbishments will be necessary to upgrade energy inefficient stock.

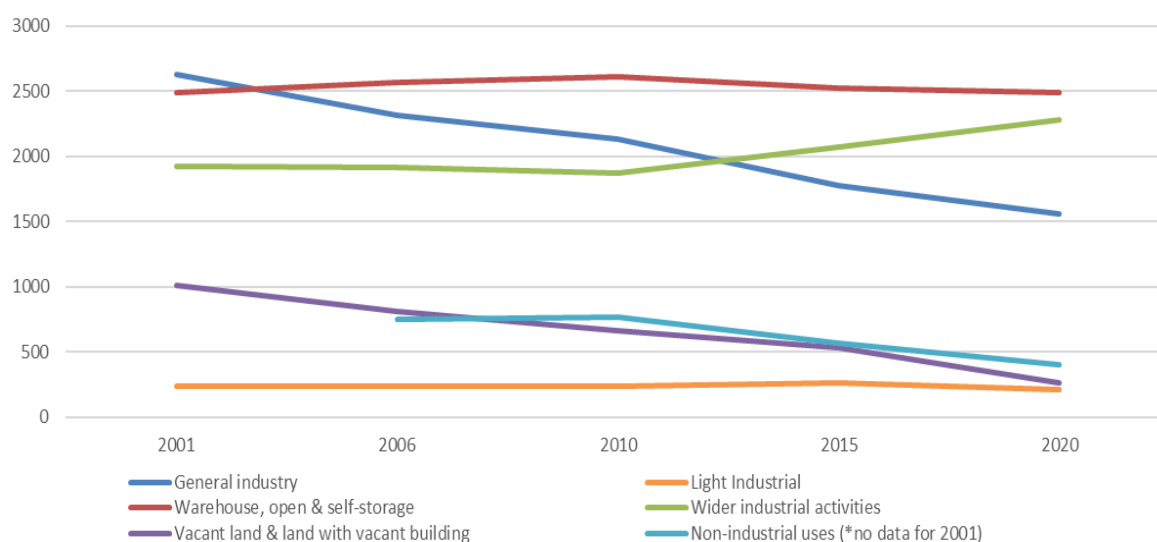
D.135 London has a network of over 240 town centres and more than 600 high streets, each performing different roles and functions. 90% of Londoners live within a ten-minute walk of a town centre or high street. Many Londoners work in London's local economies, particularly in the everyday economy sectors like care, construction, retail and hospitality. These local economies offer jobs close to home and are often the first step into work for people who have struggled with employment.

D.136 Evidence suggests that as many as 45% of Londoners use their high streets for primarily non-retail purposes. This illustrates the importance of these places for their social, community and cultural value, as well as a place to consume. Although some of London's high streets are highly successful, others are struggling and all face a number of long-term challenges. Economic restructuring, changes in consumer demand, reduced public sector budgets and climate change have all made the challenges of the pandemic more acute.

D.137 Footfall in 90% of London's town centres and high streets grew in 2024, across both daytime and nighttime periods. Spending also increased: Inner London saw higher daytime spend, while Outer London saw more nighttime spend. Vacancy rates improved, with London's rate at 9.6%, compared to 10.5% across the UK. A lower vacancy rate indicates a healthier high street environment, with more active businesses and stronger consumer engagement. While rates in Inner London were similar to the London-wide average, Outer London high streets and town centres had a lower vacancy rate on average of 8.6%.

D.138 A total of 6,800 hectares of land was in industrial use in London in 2020. Designated Strategic Industrial Locations are London's main reservoir of industrial land with approximately half of London's total supply [See reference 180]. Since 2001, the total stock of industrial land has progressively declined by 1,500 ha - an 18% contraction over 19 years to 2020. Between 2015 and 2020, the decline has been 355 ha or 5% over five years. All sub-regions have exceeded the recommended release of industrial land.

Figure D.41: Land (hectares) in specified industrial use (Source: London Industrial Land Supply Study 2023)



D.139 The majority of employment in industrial activities in London is concentrated in Outer London, with only about 18% in Inner London. Employment in industrial jobs has increased between 2001 and 2019, reversing a previous longer-term decline.

D.140 There are estimated to be 56,700 total industrial business units in London in 2020, although smaller industrial businesses not registered for either VAT or PAYE are not included. These are 11% of all business units, and 74% of them are in Outer London. Over 90% have 0-9 employees, similar to all businesses in London. There is a broad spread across size ranges in 2021 with 84% of all buildings being small to

medium sized (between 1k and 50k sqft). A much smaller proportion (2.5%) is in the 100,000 sqft + category.

D.141 In 2021 the industrial floorspace vacancy rate was 3.2%, well below the reasonable average rate of frictional vacancy of 8%. Hackney, Harrow, Hounslow, Kensington and Chelsea and Richmond all have rates below 2%. In 2020 the land vacancy rate was 4%, still below the frictional vacancy rate (the temporary, normal level of empty property units in a real estate market caused by turnover (tenants moving in/out)) of 5%. Land vacancy rates are close to 0% in Camden, Barnet, Wandsworth and Harrow. East London has higher land vacancy rates, including 18.3% in Newham, and rates above 10% also seen in Bexley, Greenwich, Barking and Dagenham and Havering.

D.142 The significant growth in demand for big box, distribution stock is fueled by changing consumer habits and the growth of e-commerce. This has focused on key locations with good access to the strategic road network including Ealing, Barking and Dagenham and Enfield. This demand is expected to be exacerbated by a growing market for non-traditional B-class uses including Film and TV production / post-production with similar requirements for large floorplate space in Outer London. In addition, the changing nature of consumer habits and industrial trends indicate that demand is growing; for example, for final mile distribution space with building typologies different to traditional ones, including smaller floorplates and close proximity to residential areas.

D.143 Beyond London's boundary, in 2021 over 17k ha of industrial land was identified within strategically important clusters in the Wider South East (WSE), with the most significant in Thurrock, East Suffolk and Milton Keynes. Thurrock has also seen the greatest rise in floorspace. The WSE has a greater proportion of larger stock (over 50,000 sqft) while London has a greater proportion of small-sized stock (under 2,500 sqft). WSE rental and capital values, even in close proximity to London, are still largely below London average values.

Air quality

D.144 Since 2016, London's air quality [See reference 181] has improved dramatically, and the number of Londoners living in areas that exceed the UK's legal air pollution limits has decreased significantly [See reference 182]. However, 100% of its residents still live in areas where pollution exceeds the recommendation of the World Health Organization (WHO) of PM_{2.5} particulate matter – extremely fine particles able to enter deep into the lungs [See reference 183]. Despite substantial progress, the latest modelling shows that without additional action, all Londoners will

still be living in areas exceeding the WHO guidelines AQGs for both NO₂ and PM_{2.5} in 2025 and 2030.

D.145 Continued action is required, as relatively small increases could bring areas home to hundreds of thousands of Londoners back over the legal limit. An increase of just 1µg/m³ from 2019 levels of NO₂ would result in an additional 68,200 people living in areas exceeding the legal limit. An increase of 2µg/m³ would result in a return of a further 156,000 people living in areas exceeding the legal limit. There is strong evidence linking adverse health impacts to levels of NO₂, PM₁₀ and especially the smaller-sized PM_{2.5}. These pollutants have well-documented health and economic impacts that fall unequally on those least likely to contribute to the problem.

Nitrogen dioxide (NO₂)

D.146 Average concentrations of nitrogen dioxide (NO₂) were much higher in London than the rest of the UK in 2016 – and yet have fallen much more steeply in London compared to the rest of the country. Annual roadside NO₂ concentrations across London dropped by nearly half (49%) between 2016 and 2023, compared to 35% in the rest of England, 39% in Scotland and 31% in Wales over the same period [\[See reference 184\]](#). The average annual mean roadside and urban background concentration of NO₂ in 2024 (based on provisional data) was 24.45µg/m³ and 17.66 µg/m³ respectively which are the lowest levels recorded in London over this period.

D.147 Urban background NO₂ concentrations are generally lower than roadside concentrations due to the distance from the main pollutant source (i.e., vehicular traffic on roads). The averages were calculated from air quality monitoring sites in Central, Inner and Outer London, between January and December 2024. For both site types, the averages are well below the requirements of UK legislation (the Air Quality Standards Regulations 2010 state that the annual average concentration must not exceed 40µg/m³) but remain well above the WHO Air Quality Guideline target of 10µg/m³.

D.148 The number of air quality monitoring stations in London recording NO₂ has increased from 123 in 2016 to 149 in 2023. According to the GLA's Air Quality in London 2016-2024 report there has also been a 99% reduction in the number of hours when NO₂ concentrations exceeded the UK's hourly legal limit since 2016 – dropping from 4,130 hours in 2016, to just 22 hours in 2023. New data from London's more than 150 reference-grade air quality monitoring sites [\[See reference 185\]](#) also show the capital has made significant progress towards reaching the UK's legal air pollution limits. The number of monitoring sites across London exceeding the UK's

annual legal limit for NO₂ [See reference 186] has decreased from 56 sites in 2016 to just five in 2023.

D.149 Compared to 2019, total NO_x emissions reduced by 23% in Greater London in 2022. The largest reduction in (tonnes of) NO_x emissions is from road transport in London, with a decrease of more than 5,000 tonnes. This equates to a reduction of 30% in road transport emissions across London between 2019 and 2022. Total NO_x emissions across London are forecast to be 12% lower in 2025, and 29% lower in 2030, compared to 2022 emission levels. The largest reduction in NO_x emissions is forecast to come from road transport in London. Road transport NO_x emissions are expected to reduce by 38% across London by 2025 and 68% by 2030, compared to 2022, as the vehicle fleet continues to become cleaner, accelerated due to schemes such as the ULEZ.

D.150 Following the increase in forecast road transport emissions due to the revision of traffic volume statistics from DfT, by 2025 road transport will still be the dominant source of NO_x across London (30% of total NO_x), although closely followed by the industrial and commercial heat and power generation source category (28%). However, by 2030, it is still expected that the latter will overtake road transport as the main source of NO_x across London.

Particulate matter (PM_{2.5} and PM₁₀)

D.151 Particulate Matter (PM) refers to particles in the air that are not a gas, consisting of various chemical compounds and materials. In an urban environment, PM is produced by a variety of activities such as construction, vehicle exhaust emissions, and road dust resuspension. Based on current evidence, PM_{2.5} is thought to be the air pollutant that has the greatest impact on human health. Both short and long-term exposure to PM_{2.5} increases the risk of mortality from lung and heart diseases as well as increasing hospital admissions. Children growing up exposed to PM_{2.5} are more likely to have reduced lung function and develop asthma.

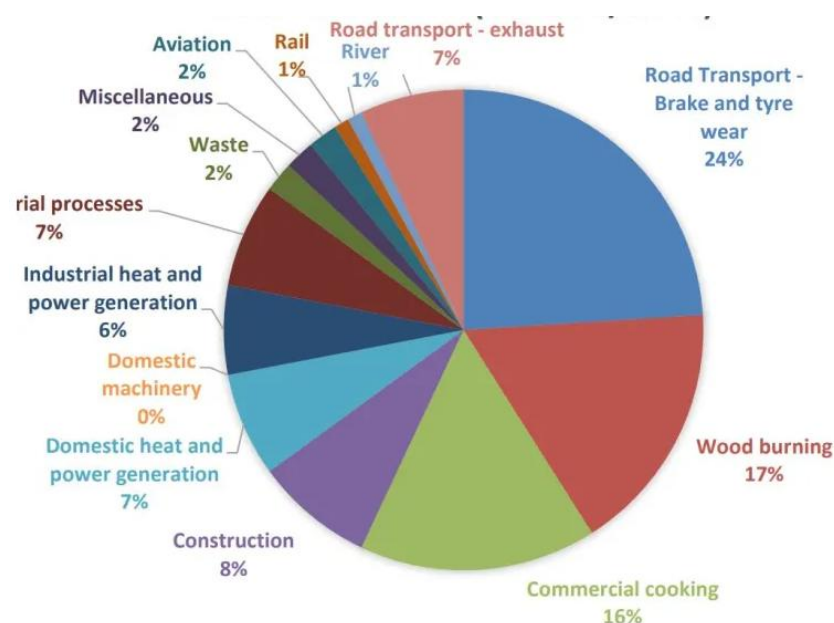
D.152 The annual mean roadside concentration of PM_{2.5} in 2024 (based on provisional data) was 8.67µg/m³, which is the lowest level recorded in London over the period 2015 to 2024. The annual mean urban background concentration of PM_{2.5} in 2024 (based on provisional data) was slightly higher than in 2023 at 8.22µg/m³. As is the case for NO₂, PM_{2.5} concentrations in the urban background are also lower than those in roadside areas, albeit marginally and the difference has reduced over time.

D.153 The averages were calculated from air quality monitoring sites in Central, Inner and Outer London, between January and December 2024. For both site types,

the averages are well below the requirements of UK legislation (the Air Quality Standards Regulations 2010 state that the annual average concentration must not exceed $20\mu\text{g}/\text{m}^3$) but remain above the WHO Air Quality Guideline target of $5\mu\text{g}/\text{m}^3$.

D.154 While strong progress has been made for NO_x and $\text{PM}_{2.5}$, the total emissions for PM_{10} have remained stable, indicating that there is still further work to be done to reduce emissions. In 2022, total PM_{10} emissions in London remain at a similar level as in 2019. Whilst a strong reduction was seen for estimated road transport emissions of 14% in 2022 compared to 2019, this was counterbalanced by an increase in estimated construction dust emissions (11%), due to increased construction activity particularly in central London, although it is important to note that construction emissions estimates are subject to significant uncertainty, inherent to the methodology and data used to calculate emissions.

Figure D.42: All sectors contributing to $\text{PM}_{2.5}$ emissions in London, percentage contribution in 2019 measured by tonnes per year



D.155 In 2022, construction emissions contributed the largest single source of PM_{10} accounting for 33% of total emissions in London, followed by road transport at 25% and resuspension at 16%. Despite not being the largest source, the largest reduction in (tonnes of) PM_{10} emissions is from road transport in London, with a decrease of about 300 tonnes. Total PM_{10} emissions across London are forecast to be 7% lower in 2025, and 12% lower in 2030, compared to 2022 emission levels.

Biodiversity and natural environment

D.156 London has a long history of being a green city, boasting rich and varied landscapes and important habitats. Today, it is one of the world's greenest cities, becoming the first National Park City in 2019. Around half of London's area is 'green'. Around a third of this green space is natural habitats and around 14% is vegetated private garden land. Over 2.5% of London is made up of blue space, such as rivers, canals, and reservoirs **[See reference 187]**.

D.157 The richness of London's natural environment includes private gardens, parks and open spaces and green corridors along canals and railways as well as on the River Thames and its tributaries. There is evidence of psychological, physical and social benefits of proximity to, and engagement with, the natural environment. Vegetation, particularly trees, can contribute to air quality improvements and help to reduce the effects of the urban heat island. Increased vegetation also helps to reduce surface run-off.

D.158 Natural spaces offer Londoners places to relax, exercise, play, and connect with the city's natural heritage and culture. They also serve as essential habitats for wildlife, help protect the people who live and work here from the effects of climate change and play a role in improving air quality. London's parks, woodlands, nature reserves, wetlands and community gardens help keep London cool, reduce the risk of flooding, provide homes for wildlife and allow Londoners to enjoy nature. Despite its importance, nature is in decline globally and the UK is among the most nature-depleted countries in the world.

Protected habitats

D.159 There are three Special Areas of Conservation (SACs), two Special Protection Areas (SPAs), and two Ramsar sites (wetlands of international importance) in London:

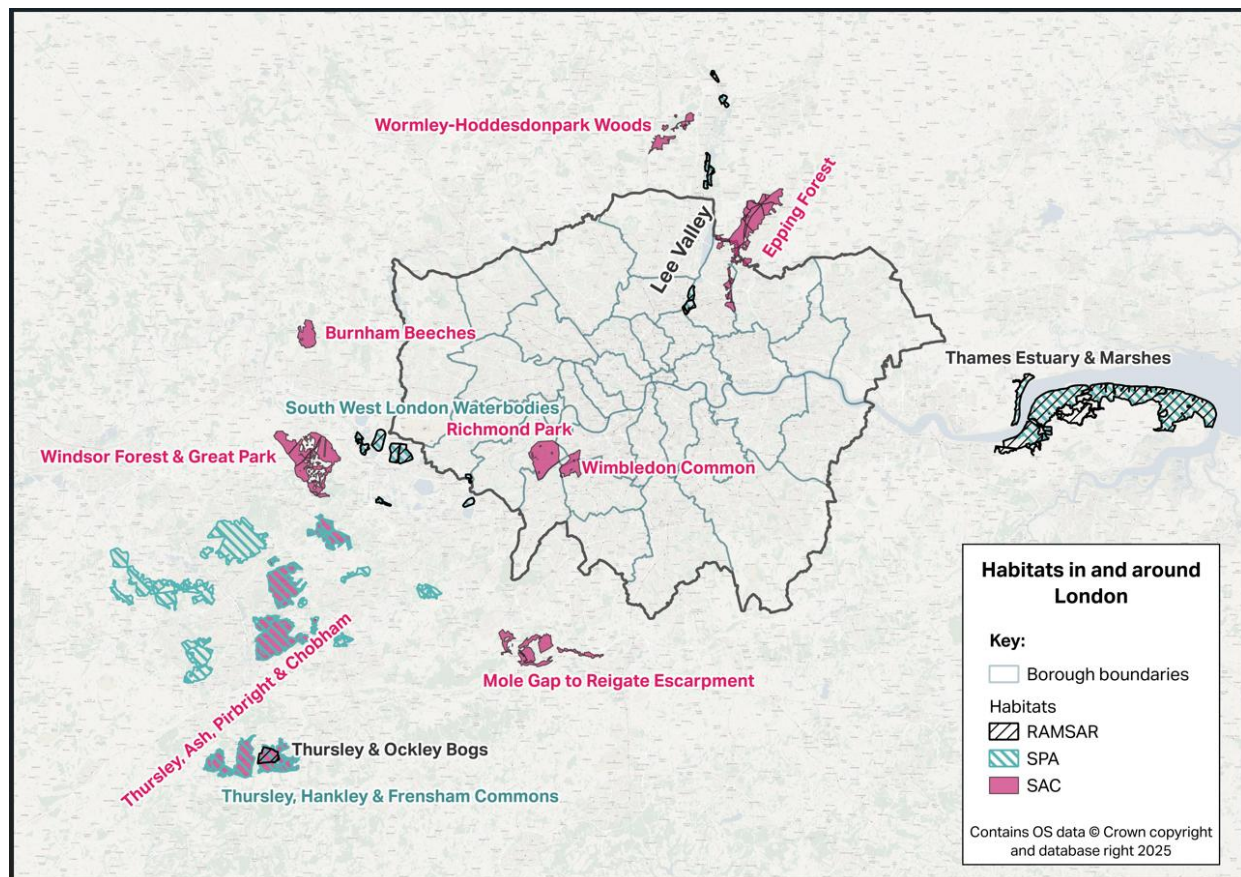
- Richmond Park SAC located within the London Borough of Richmond upon Thames and immediately adjacent to the London Borough of Wandsworth and the Royal Borough of Kingston upon Thames.
- Wimbledon Common SAC located in the London Borough of Wandsworth and the London Borough of Merton and immediately adjacent to the Royal Borough of Kingston upon Thames.
- Epping Forest SAC located in the London Borough of Waltham Forest, the London Borough of Redbridge and Epping Forest District; hence partially inside and outside the GLA boundary.

- Lee Valley SPA and Ramsar site located in the London Borough of Waltham Forest, Epping Forest District and the Borough of Broxbourne; hence partially inside and outside the GLA boundary.
- South West London Waterbodies SPA and Ramsar site located in the London Borough of Hounslow, the Borough of Elmbridge, the Borough of Runnymede, the Borough of Spelthorne and the Royal Borough of Windsor and Maidenhead; hence partially inside and outside the GLA boundary.

D.160 Outside London, the following habitats sites are also considered because there is potential for impacts stemming from the London Plan to create significant effects:

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

Figure D.43: Sites (RAMSAR, SPA, SAC) relevant to the Habitat Regulations for London (Source: GLA)



D.161 More detailed information about the European sites, their qualifying features and specific conservation objectives is provided in the Habitats Regulations Assessment (HRA) report that will accompany the new London Plan.

D.162 London also has nationally important nature conservation sites. These include three National Nature Reserves and 37 Sites of Special Scientific Interest (SSSIs), 30 of which are designated for their biological interest. At a local level, London has 154 Local Nature Reserves, covering a variety of habitats and species [See [reference 188](#)]. Areas of Ancient and Semi-natural Woodland can be found in 17 boroughs. Areas of Ancient Replanted Woodland can be found in 10 boroughs.

London's Sites of Importance for Nature Conservation

D.163 Other important wildlife sites in Greater London are identified as Sites of Importance for Nature Conservation (SINCs). This is a non-statutory designation, but SINCs are still afforded a high level of protection within the planning system. The

amount of area covered by SINC in London provides an indication of the extent of wild spaces across London.

D.164 As of March 2025, data compiled by Greenspace Information for Greater London (GIGL) finds that in total 1,696 SINC have been identified, and the total area designated as SINC in London is 31,666 hectares, up slightly from 31,470 hectares in 2024 [\[See reference 189\]](#). GIGL's data [\[See reference 190\]](#) (and the Local Nature Recovery Strategy for London) indicates that between 2013 and 2024, there was an increase of just over 950 hectares in land designated as SINC (with 114 sites added), increasing the coverage of London from 19.2% to 19.8%.

D.165 SINC are variously graded as Metropolitan, Borough and Local depending upon the relative importance and value of the SINC:

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

D.166 While the distribution of designations between the different SINC grades (Metropolitan, Borough and Local) has largely stayed the same, there has been a small but notable increase in Local SINC, which have increased in area by around 10%. Borough SINC have increased in area by just over 5%, but there has been less than a 1% increase in Metropolitan SINC coverage [\[See reference 191\]](#).

London's Priority Habitats

D.167 The London Environment Strategy [\[See reference 192\]](#) identifies ten priority habitats [\[See reference 193\]](#) in London, as set out below. These are the most threatened and in need of restoration:

- Acid grassland
- Chalk grassland
- Lowland meadows

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

D.168 There is currently no London-wide monitoring system for nature, meaning that the best information available on habitats change is relatively old. Between 2000 and 2014, almost 39,000 ha of habitat were reported as having been enhanced in London and over 18,000 ha of habitat restored. Examples include creation of over 600 ha of new woodland in Thames Chase on London's eastern fringe; the creation of reedbeds in the central London Royal Parks; the expansion of 3.5 ha of heathland at Mitcham and West Wickham Commons; and the creation of 45 ha of various biodiversity action plan habitats in the Queen Elizabeth Olympic Park [\[See reference 194\]](#).

London's species

D.169 London is home to more than 18,000 species, including protected and rare species [\[See reference 195\]](#). London is thought to host around half the British population of greater yellow-rattle and around a quarter of Britain's black redstarts [\[See reference 196\]](#). London has internationally important sites (designated as SACs, see above) for stag beetle (*Lucanus cervus*) at Epping Forest, Wimbledon Common and Richmond Park. London is also home to internationally important populations of great bittern, gadwall and northern shoveler in SPAs.

D.170 The British Trust for Ornithology calculated population trends for 33 bird species in London and surrounding areas for the period 1994 – 2011. Over that time, 21 of the 33 species increased significantly. Five species declined significantly in the region during this same period (blackbird, grey heron, house sparrow, mistle thrush, song thrush, starling and swift), generally mirroring national trends. Loss of nest sites in buildings (resulting from the trend to seal buildings for energy efficiency reasons) and the loss of vegetated areas in gardens may help account for the decline in species such as house sparrow, starling, blackbird and swift [\[See reference 197\]](#).

D.171 Tailored conservation efforts for certain species that have an urban or London affiliation have achieved notable successes. The creation of biodiverse green roofs,

for example, in areas where black redstarts are known to breed seems to have maintained the London breeding population (despite redevelopment of many former wasteland sites where they bred). Likewise, the provision of nest boxes and protection of nest sites has resulted in an increase in the number of breeding pairs of peregrine falcons. These are now found in most parts of London [\[See reference 198\]](#).

London's green spaces

D.172 Green spaces in London range from wetlands, to woodlands, heathlands, and Richmond Park and are home to more than 15,000 species. As a highly urbanised area, it is important to recognise how these green spaces contribute to London's biodiversity. London has over 2,000 community gardens, [\[See reference 199\]](#) 12 city farms [\[See reference 200\]](#), and more than 740 allotments with over 40,000 plots [\[See reference 201\]](#). A recent survey of food growing sites such as community gardens and allotments found that these sites provide significant habitat for nature.

D.173 Greenspace Information for Greater London CIC (GIGL), the capital's environment records centre, has developed an approach to estimate Londoners' access to public open space based on walking distances along roads and paths. Areas within acceptable distances to Public Open Space are calculated using network analysis, with areas outside of these calculated spaces classified as areas of deficiency. As of March 2025, 38% of residential addresses in London fall within an Area of Deficiency in access to Public Open Space (AODPOS) [\[See reference 202\]](#). While there are no comparable statistics available due to varying definitions of access across England, the Department for Environment, Food & Rural Affairs (DEFRA) is developing official statistics on access to green space which will allow comparisons in the future [\[See reference 203\]](#).

D.174 Deficiency in access to district parks covers about half of London, including areas of inner London, such as the whole of the City of London, and parts of outer London, for example parts of the LBs of Havering, Harrow and Kingston upon Thames. Boroughs with district parks within or adjacent have less deficiency in access and therefore more areas of low need, such as LBs Richmond, Wandsworth, City of Westminster, and Hackney [\[See reference 204\]](#).

D.175 Particularly high levels of deficiency in access to local parks are evident in outer London, for example within the LBs of Bromley, Kingston upon Thames, Harrow and Enfield. Inner London boroughs such as LBs Camden, City of Westminster, Islington, Lambeth and Tower Hamlets have numerous local parks and therefore lower levels of need than other boroughs. Areas of deficiency in access to nature (SINCs) is less widespread, although there are still notable areas of

deficiency. These include parts of LBs Hillingdon, Harrow, Enfield, Croydon, Lambeth, Waltham Forest, Newham and Havering [\[See reference 205\]](#).

D.176 Domestic gardens make up 24% of London's land area. Much of this is paved, decked, or covered by sheds or similar buildings and there is a growing trend for replacing vegetation with hard surfaces. Private gardens provide many people with daily contact with nature and form a pleasant component of residential areas. A single garden may provide habitat for a range of plants and wildlife and collectively they are an important resource for conserving species such as hedgehogs, amphibians and pollinating insects.

D.177 Despite the increase in garden land between 2002 and 2014, data from 2010 [\[See reference 206\]](#) shows that between 1998-99 and 2006-08, the area of vegetated garden land declined by 12%, a loss of 3,000 ha, whereas the amount of hard surfacing and buildings (such as sheds) increased. The changes in garden cover are mainly due to many small changes to individual gardens by homeowners, rather than large scale changes or housing development on garden land. However, both can lead to significant loss of garden land at a local level.

D.178 The GLA's Green Cover Map provides estimates of how much of London is green, specifically tree canopy cover and green cover. In 2024, London's tree canopy cover is estimated at 19.6% (with a $\pm 0.3\%$ margin of error) and its green cover at 51.7% ($\pm 1.11\%$). Previously, London's canopy cover was estimated at 21.06% ($\pm 0.2\%$) and green cover estimated at 47.6% to 50.7%. While the latest data would indicate a decrease in tree canopy cover, there is no statistically significant change in canopy cover across London within the timeframe (2016 to 2022) [\[See reference 207\]](#). Approximately one-quarter of urban wards in the UK have canopy cover exceeding 20%, a benchmark often suggested as a minimum target. GLA's analysis indicates that London's overall canopy cover is just below this threshold.

D.179 London's urban forest comprises areas of extensive woodland, wooded landscapes in parks and open spaces, trees in residential gardens and street trees that covers about 20% of London [\[See reference 208\]](#). Together, these eight million trees [\[See reference 209\]](#) and woodlands form London's urban forest. This includes ancient woodland, community orchards, street trees and trees in parks. London's woodlands are mostly broadleaved and cover 8% of London's land area (13,300 ha), with 20% of this defined as ancient woodland. London's trees remove an estimated 2,000 tonnes of pollution from the air each year. This is equivalent to 13% of particulates (PM₁₀) and 14% of Nitrogen Dioxide (NO₂) emitted by motor transport [\[See reference 210\]](#). London's urban forest provides at least £133m of value each year [\[See reference 211\]](#).

D.180 Tree cover is not distributed evenly across London and the percentage canopy cover ranges from 3% at its lowest (in Barking and Dagenham) to 45% in Chislehurst, Bromley [\[See reference 212\]](#). Tree equity is a measure of how easy it is for people to access trees. Whilst much of London has a high tree equity score, there are several neighbourhoods with lower scores, with the lowest in Brent [\[See reference 213\]](#).

D.181 There is a strong body of evidence that shows that being in contact with the natural environment is vital for our mental wellbeing and physical health at all ages. People with access to good quality green space have better mental and physical health and every 10% increase in green space is associated with a reduction in disease equivalent to a gain of five years of life.

D.182 Feeling part of nature is a proxy measure for whether people are enjoying green and wild spaces across the capital, as it relates not only to access but also to people's personal experience with nature [\[See reference 214\]](#). The People and Nature Survey is a national survey by Natural England that collects information on adults' and children's experiences and views about the natural environment, and its contribution to health and wellbeing. There is slight increase in the percentage of adult Londoners who feel part of nature, rising from 59.3% in 2020/21 to 62.8% in 2024/25 [\[See reference 215\]](#). By comparison, the percentage across England also shows a slight upward trend, reaching 63.5% in 2024/25 [\[See reference 216\]](#).

D.183 Future pressures on the natural environment are likely to worsen the issues listed above. A continued climate emergency will exacerbate changes to weather patterns (hotter and drier summers, warmer and wetter winters, and more extreme weather events). In turn, this will worsen the effects of climate change, including flooding, drought, changes in species composition, and the spread of pests, diseases, and invasive species. Similarly, London's population is growing, further exacerbating human disturbance, land use change (particularly increased development), and water abstraction, required to serve new development.

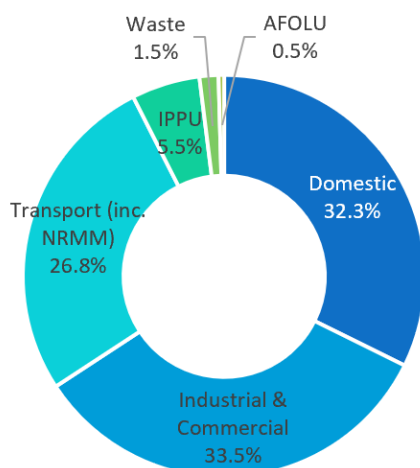
Climate change

CO₂ emissions

D.184 Greenhouse gas emissions (GHG) in London are reposted annually in the London Energy and Greenhouse Gas Inventory (LEGGI). The latest report was published in November 2024 and is based on data for 2022, the most recent year for which information is available. In 2022, London's CO₂ emissions were 28.40 million tonnes (Megatons of carbon dioxide equivalent, MtCO_{2e}). Emissions from domestic,

industrial and commercial buildings were responsible for 66% of the total, transport emissions for 27%, with other sources responsible for the remainder.

Figure D.44: Greenhouse gas emissions by sector, 2022 (Source: LEGGI)



D.185 Over the short-term, emissions went down from 31.94 MtCO₂e in 2019 (pre-pandemic), to 28.37MtCO₂e in 2021 and then in 2022 there was a very small ‘pandemic rebound effect’ as emissions increased to 28.40 MtCO₂e [See reference 217]. Over the longer term, emissions are 37% lower than 1990 levels and 44% below the peak of emissions in 2000. Despite a 30% increase in population since 1990 and significant economic growth over that period, London’s per capita emissions have reduced by 52%, from 6.7 tCO₂e in 1990 to 3.2 tCO₂e in 2022. Compared to the rest of the UK, London has the lowest per capita emissions of any region.

D.186 Houses and workplace buildings account for 36% and 42% of the city’s CO₂ emissions respectively. Improving the energy efficiency of the housing stock is vital for achieving London’s net zero ambitions because it reduces the overall demand for energy, which in turn lowers the amount of GHG emissions associated with energy production and consumption. An Energy Performance Certificate (EPC) indicates how energy efficient a building is, from A (most efficient) to G (least efficient). EPCs are required when properties are built, sold or let, and all new EPCs are added to the Energy Performance of Buildings Register.

D.187 Across England, the share of domestic EPCs added to the register with a rating of A-C has trended upwards over the last decade. In London, the share has increased from 36% in Q4 2014 to 64% in Q1 2025, consistently remaining above the national trend over this period [See reference 218]. Tower Hamlets in London stands out as the local authority with the highest percentage of housing in band C or

above, with 82% of dwellings with a valid EPC registering a score of 69 or above [\[See reference 219\]](#). However, a quarter of London homes and 37% of non-domestic buildings in the city have been certified E, G, and F, the worst energy ratings.

D.188 The amount of electricity generated in London via renewable sources including wind, solar photovoltaic, landfill and sewage gas or other biomasses and waste is increasing. Since 2014, renewable electricity generation in London increased by over 50%. It peaked at 1,393 GWh in 2020, while decreasing slightly in 2022 and in 2023, to 1,172 GWh mainly due to a decrease in generation from biomass and waste. Total electricity consumption in London in 2022 was almost 34,000 GWh (the latest data available from LEGGI) – meaning that local renewable electricity generation accounted for only around 3% of London’s electricity consumption.

D.189 London continues to have one of the lowest solar installation rates in the UK, primarily because of factors like the high number of flats, rented properties, and complex urban planning challenges. These issues, combined with higher installation costs in the capital, lead to a lower percentage of households with solar panels compared to other UK regions.

Heat risk

D.190 The change in global climate is causing an increase in frequency, duration, and magnitude of extreme heat events, including heatwaves. High temperatures in cities affect infrastructure, worker productivity and have significant effects on health and wellbeing, particularly for vulnerable populations [\[See reference 220\]](#). The result of extreme heat in summer, and the experience of occupants of existing homes and buildings that are not adapted for climate change, disproportionately impacts certain groups, especially:

- those with pre-existing mental and physical health conditions
- the very old and young
- those on low incomes
- outdoor workers
- rough sleepers
- those with protected characteristics are at risk from and/or vulnerable to extreme heat

D.191 In July 2022, London hit 40°C. During that heatwave, the LFB received 2,496 calls, including 740 relating to wildfires, and operations were cancelled at Guy's and

St Thomas' hospitals as IT servers broke down in record heat [\[See reference 221\]](#). Future increases in electricity demand for cooling, as a result of rising temperatures, could affect London's energy supply. For example, extremely high demands on London's power supply network due to high cooling demand could lead to subsequent 'brown outs' meaning a reduction in or restriction on the availability of electrical power in a particular area.

D.192 Data from the UK Health Security Agency (UKHSA) show that in 2024, London experienced four heat episodes, resulting in an estimated 144 excess heat associated deaths. Since 2016, the number of excess deaths in London has varied year on year but remained stable (approximately 300 to 400 deaths) compared to the trend for England. The highest number of excess deaths in a summer in London occurred in 2020 at 488, with 412 of these occurring during a ten day heat episode. The highest number recorded in while England' was for summer's 2022 at 2,985. These statistics were calculated using death registration data, comparing daily deaths during heat episodes with baseline daily deaths.

D.193 Higher average temperatures are likely to intensify the Urban Heat Island (UHI) effect which can result in the centre of London being up to 10°C warmer than its surroundings. Heat islands can develop in fairly large areas within a city, or in smaller 'pockets' around individual buildings or along streets. London has a fairly pronounced UHI due to its size and density. The variation of temperature can depend upon the nature of the land cover with parks and lakes cooler than adjacent areas covered by buildings which absorb and trap heat.

D.194 High temperatures also cause damage to trees which are critical to city resilience and provide cooling shade. Analysis carried out for Friends of the Earth found that inner city areas with fewer trees and green spaces were up to five degrees hotter in July 2022 than those with more tree cover and plant life [\[See reference 222\]](#). Wildfires are a growing threat at London's rural-urban interface, as shown by the fires at Wanstead Flats in 2018 and Wennington in July 2022. These events highlight the importance of informed land management where planning boundaries meet the natural environment. Wildfires pose a significant risk to nature, and England does not yet have a national strategy or action plan for managing wildfires.

Drought and water supply

D.195 Ground water depletion combined with hotter and drier summers has the potential to significantly impact public water supply, especially in the southeast of England [\[See reference 223\]](#). London is already an area of serious water stress. [\[See reference 224\]](#). In 2022, London saw temperatures exceed 40 degrees, a 50% increase in water consumption and our reservoirs were at their lowest for 30 years

[See reference 225]. Without action, there could be a 2.5billion litre per day gap between the demand and supply of water in the South East by 2050 **[See reference 226].**

D.196 During prolonged dry periods, water companies put in place different measures to protect water supply. There are four levels of drought plan measures used in England; level 3 and above are defined as emergency measures to protect supply and involve non-essential water use bans. Measures must be timely and proportionate to the drought risk to avoid the need for even more severe level 4 restrictions.

D.197 The last time emergency drought measures were reported in London was in 2022. For the year 2025/26, Thames Water reported no days in emergency measures (drought level 3 and above), indicating no severe drought events that triggered this level of response **[See reference 227]**. This aligns with the previous year's reporting (2023/24), which also recorded no emergency measures. While the absence of drought emergency days in recent years is positive, it should be interpreted with caution. The Environment Agency's assessment of water companies across England in 2023/2024 found that while there were no operational drought-related supply issues during this time, water companies did not have enough water available in some areas to meet demands if there had been a drought **[See reference 228]**.

Flood risk

D.198 There are many sources of flooding in London, including tidal, fluvial, surface water, ground water, sewer and reservoir. Due to climate change – which would bring about wetter winters and heavier rains that can raise the sea level – both the risk and intensity of major flash floods have increased. The updated review of strategies and flood risk modelling reveal that the main flooding issues in London are surface water flooding (flash floods) resulting from heavy rain overwhelming outdated drainage and impermeable surfaces from new development, tidal flooding from storm surges in the Thames, and river/fluvial flooding from high river flows. These are exacerbated by the city's extensive hard surfaces, Victorian-era sewers not designed for modern rainfall intensity, and the increased frequency of extreme weather events due to climate change.

D.199 9% of London is at high risk (1 in 30-year event) of tidal, river or surface water flooding and 13% at medium risk (1 in 100-year event) **[See reference 229]**. This represents a notable increase from the results of RFRA in 2018 of 6% and 11% respectively. With the climate change scenario added to the spatial analysis, the risk of flooding significantly increases to 16% of London being at high risk (1 in 30-year

event) of tidal, river or surface water flooding and 23% at medium risk (1 in 100-year event) [\[See reference 230\]](#).

D.200 London's Surface Water Strategy published in May 2025 estimates that there are almost 320,000 properties at high risk of flooding in London. Around 18 properties in South London and 121 properties in North London were reported to have flooded in 2023/24 [\[See reference 231\]](#). Most of these incidents occurred in September 2024, a period during which London faced surface water flooding resulting from heavy rainfall [\[See reference 232\]](#). These figures are indicative and based only on reported cases to the Environment Agency, meaning the actual number of properties flooded is likely to be higher due to unreported incidents and incomplete data.

D.201 Flooding poses a lethal risk to Londoners. In July 2021, London was hit by two extreme rainstorms. Some parts of the city received more than twice the average July rainfall in two hours, causing major disruption and over 2,000 properties flooded with stormwater and sewage. More than 30 tube stations were affected; hospital wards were evacuated. Of all properties at risk of flooding (coastal, fluvial, groundwater and surface water) across England, 60% are at risk of surface water flooding [\[See reference 233\]](#).

D.202 The types of strategic infrastructure with the highest percentages in terms of assets in high flood risk areas are bus depots, railway stations, TFL underground stations, hospitals and schools. The majority of these critical assets are located in areas at high risk from surface flooding. All other infrastructure assets have lower proportions for high flood risk. More information can be found in the updated London Regional Flood Risk Assessment Report produced by GLA.

D.203 London's existing river defences currently protect homes, critical infrastructure, and businesses. Sea level in the Thames Estuary is now expected to rise by around 1.15 metres by the end of this century [\[See reference 234\]](#). There are seven end-of-century options for the future of the flood defence system, and a decision will be made on the end-of-century option by 2040. The deadline for upgrading defences downstream of the Thames Barrier is 2040 [\[See reference 235\]](#). This is also the deadline for completing the first stage of downstream defence upgrades. While the current Barrier is expected to last until 2070, to prolong the Barrier's lifespan until an end of century option is in place, the Environment Agency will have to stop using the Thames Barrier to protect west London communities from fluvial floods by 2035.

D.204 While London is well protected against tidal flooding, it has a much lower level of protection in place against surface water flooding. The latest National Flood Risk Assessment (NaFRA2) [\[See reference 236\]](#) update shows that nearly a third of a million residential properties in London (319,800) are at high risk from surface water

flooding [\[See reference 237\]](#), including at least 45,000 basements [\[See reference 238\]](#). This total represents almost 30% of all such at-risk properties in the country and is more than eleven times the number of London properties that are at high risk from river and sea flooding. In addition, around 40% of London's 300,000 commercial properties are estimated to be at risk of surface water flooding [\[See reference 239\]](#).

D.205 This indicates a significant increase in the numbers at high risk from surface water from (200,000 residential properties in previous modelling). Recent analysis indicates that nearly half (14,780) of London's 33,200 basements in commercial use are at risk of flooding from heavy rain [\[See reference 240\]](#). This comes after Zurich's data scientists pinpointed every commercial or mixed-use property in the city and mapped them against areas of flooding from heavy rain. Of these, 5,692 basements face a "high" or "extreme" flood risk, with the greatest number of buildings in Westminster.

D.206 Groundwater flooding in London is also a significant risk, particularly in areas built on gravel beds over London Clay, such as Hammersmith, Fulham, Southwark, and Wandsworth. In parts of Croydon and South London which has historically experienced groundwater flooding, the Environment Agency provide a groundwater alert or warning service.

D.207 Research shows that surface water and sewer flooding will disproportionately impact those most vulnerable [\[See reference 241\]](#). They are projected to be the most likely to experience flooding, may need more support to evacuate during a flood, and have access to fewer resources to recover quickly from any damage and disruption. London's climate risk mapping shows that high flood risk areas often coincide with places that also have higher levels of income deprivation, poor health outcomes, larger proportions of very young and older residents, and higher proportions of BAME populations – all factors associated with greater vulnerability to flooding impacts and reduced adaptive capacity.

D.208 In many parts of the capital, more than 75% of vulnerable people are already at risk of surface water flooding [\[See reference 242\]](#). This will mean they are more likely to experience both the direct damage of flooding and, the indirect impacts of stress, higher insurance premiums, and disruption to public services for which they may have greater need. Many of these vulnerabilities relate to protected characteristics (such as disability and age) and income and housing status affected by structural inequalities that arise from discrimination and other unequal access to opportunity/division of responsibility.

Energy use

D.209 Overall, London, alongside Manchester and Birmingham, have the highest electricity consumption in the UK [\[See reference 243\]](#). London consumed an estimated 121,101 GWh of energy in 2022, a 10% reduction on 2018 levels of energy use despite a population increase over this period. 39% of the 2022 energy use was consumed in London's homes, 37% from London's commercial and industrial sector and 24% in the transport sector. Gas consumption made up 45% of the total energy consumed in London in 2022, and electricity consumption accounted for 27%.

D.210 London's energy consumption has a long-term declining trend, though it has been less steep than in other UK regions. Recent years show mixed trends, with domestic consumption dropping significantly due to warm weather but transport consumption rising.

- Domestic consumption: Domestic energy use saw a sharp fall in 2022 compared to the previous year, largely due to record warm temperatures.
- Transport consumption: Transport energy use is rising from 2020, driven by a rise in air travel and light goods vehicle consumption.
- Other sectors: Consumption in the industrial sector decreased during the pandemic but overall final energy consumption rose due to transport growth.

D.211 Gas usage in the domestic sector increased during the pandemic, followed by a steady decrease since 2021, and this trend is expected to continue despite projected population growth. Gas contributes to 30% of London's total emissions mostly to heat buildings, [\[See reference 244\]](#) and without decarbonising gas networks and switching to greener gases [\[See reference 245\]](#) such as hydrogen, London is unlikely to achieve net-zero emissions. Electricity usage has stabilised despite the increase in population, largely due to increased efficiency of appliances. However, it is expected that demand for electricity to rise as population continues to grow and heating and transportation are increasingly electrified, in favour of electricity from a decarbonised grid.

D.212 Capacity of the energy supply is also a concern. Significant new investment is already urgently needed in electricity substations capacity and distribution to keep up with demand and to accommodate the step change in the rate of house delivery that is required [\[See reference 246\]](#). One in five substations has less than 7% spare capacity. Most of London's heat and hot water needs are supplied by the gas grid with boilers in each building. London's electricity comes from the electricity grid. Power in this grid is generated in large powers stations outside of London.

D.213 London's energy supply from decentralized systems includes solar panels, local heat networks, and combined heat and power (CHP) plants. The city has set targets to increase the share of energy from these local, low-carbon sources, with a goal of generating 15% from local, renewable sources by 2030. Existing energy resources are not being utilised as effectively as they could be, for example existing energy sources such as waste heat from industrial processes could be used to heat buildings.

D.214 The UK has set an ambitious commitment for up to 10GW of low carbon hydrogen production capacity by 2030 [\[See reference 247\]](#). The 'Accelerated Green' pathway has been selected as the preferred route to reaching net zero in London by the Mayor of London, part of which estimates hydrogen demand in industrial processes will stand at approximately 0.3TWh per year by 2030. The source for the hydrogen projected to be used by these businesses is a crucial factor in any decarbonisation plan. There will be an accompanying massive scaling up of renewables needed to ensure London's businesses can access sufficient green hydrogen, otherwise it will be obtained from fossil fuel sources.

D.215 Fuel poverty continues to be an issue in London, with 9.4% or 350,000 households meeting the Government's 'low income high cost' definition of fuel poverty (compared to 11% across England). However, as the definition favours larger homes, there may be many households in smaller properties who also struggle to pay their fuel bills despite not meeting the definition. As set out in the Mayor's Equality, Diversity and Inclusion Strategy (2018), the groups most likely to be fuel poor are families with children, disabled Londoners and people from BAME groups.

D.216 London has one of the lowest rate of fuel poverty in England due to a combination of the highest median A-C fuel poverty energy efficiency ratings (FPEER) at 71, the smallest typical home sizes, with median floor area of 78m², the lowest median equivalised fuel costs (£1,978), and median equivalised incomes higher than the national median of £28,816 [\[See reference 248\]](#). In 2024, London had the lowest average fuel poverty gap of £298 which could be explained by London having the lowest median fuel costs (£2,200 and £2,100 respectively) and the highest median energy efficiency rating (both 71) [\[See reference 249\]](#).

D.217 Changing fuel prices and energy efficiency, as well as increases or decreases in relative income and housing costs can impact on these figures. Using the previous measure of low income high costs, London also tended to have a lower level of fuel poverty than England. Throughout the last decade there is a clear downward trend overall, as energy efficiency has improved, both in London and nationally. Increased uncertainty of the data during the early part of the pandemic means that this should be treated with caution [\[See reference 250\]](#).

D.218 One way of helping to tackle energy affordability (including fuel poverty) is to improve the efficiency of London's buildings and transport. Retrofitting is a huge challenge in London. Over 80% of the buildings standing today will still be occupied in 2050 [See reference 251]. There are around 3.4 million homes in London, the vast majority of which will need to be retrofitted with building fabric measures (such as cavity wall insulation) and potentially on site renewable energy generation to reduce the energy demand, if GHG reduction targets are to be met.

Geology, soils and land use

D.219 London's biodiversity is underpinned and influenced by its geodiversity (rocks, minerals, landform and soil diversity). Greater London lies within the London basin, a large geological 'dish' that dominates the geology of the Home Counties. It is bounded to the south by the chalk of the North Downs and to the north by the chalk outcrop of the Chiltern Hills.

D.220 London's main bedrocks are chalk and London Clay, with much of the surface geology made up of sands and gravels. The London Clay Formation produces heavy acidic soils, often prone to waterlogging in winter months and to shrinking and cracking in summer. The soils formed from this surface geology produce a complex mosaic of different habitats with distinct plants and wildlife. The Thames and its tributaries form a broad, shallow valley. The main tributaries of the Thames within London are the Hogsmill, Beverley Brook, Wandle, Ravensbourne, Roding, Ingrebourne, Beam, Lea, Brent, Crane, and Colne.

D.221 London has a range of distinctive natural landscapes shaped by geological processes, such as undulating chalk downlands in south London and the river terraces in the north. London's geological sites are protected through designations including Sites of Special Scientific Interest (SSSIs), Regionally Important Geological Sites (RIGS) or Locally Important Geological Sites (LIGs). There are seven geological SSSIs in London, four of which are in favourable condition and three in unfavourable condition.

D.222 The Agricultural Land Classification (ALC) system classifies land into five grades. The best and most versatile agricultural land is defined as Grades 1,2 and 3a of the ALC. A combination of climate, site and soil characteristics and their unique interaction determine the limitation and grade of the land. These affect the:

- range of crops that can be grown
- yield of crop
- consistency of yield

■ cost of producing the crop

D.223 When considering development proposals that affect agricultural land, the London Plan should aim to protect the best and most versatile (BMV) agricultural land and soils in England from significant, inappropriate or unsustainable development proposals. At the strategic scale, Natural England produces mapping that predicate the likelihood of BMV agricultural land for London and the South East [See reference 252]. This shows that land with high and moderate likelihood of BMV is concentrated in the outskirts of London.

D.224 The underlying geology and the man-made substrates of former buildings and demolition rubble that overlays much of London's underlying geology can have a profound effect on matters such as sub-surface hydrology and the types of landscapes that can be created, managed and maintained in the urban environment. Some soils in London have high levels of contamination from substances that are legacy of former industry, such as old gas works, landfills or chemical plants. This is a particular issue for some of London's larger brownfield sites which require redevelopment. Risk of soil degradation is also increasing, particularly during the construction of new developments and infrastructure.

Burial space

D.225 The availability or capacity of burial space across London varies considerably, with supply and demand often dependent on location and on demography. This is influenced by both the size of an area's ageing population, and the proportion of faith or ethnic groups – including Muslim and Jewish communities, whose beliefs preclude cremation and typically favour the interment of a single body in each grave.

D.226 The 2026 Burial Space Audit states that by 2040, London's population aged 65 and over is projected to increase by 40.9% (from 2022 levels), significantly intensifying pressure on already limited burial space. Inner and central boroughs face the most acute pressures, with many expected to reach full capacity within the next five years. Outer boroughs hold most of the remaining long-term capacity and currently absorb some cross-borough demand. The greatest need for Muslim and Jewish burial needs is within the boroughs of Barnet, Camden, Hackney, Newham, Redbridge, and Tower Hamlets.

D.227 Overall, the 2026 Audit finds that London's burial provision is unevenly distributed, has worsened since 2011 Audit, and remains insufficient in light of population growth and faith-specific burial needs. While options such as grave reuse and other intensification measures exist, these remain limited in practice, meaning that more new burial sites will ultimately be required to meet future demand.

Previously developed land

D.228 London saw a large expansion in its population and geographic area up until the Second World War. Urban land was not in restricted supply because new transport – commuter rail, trams, London’s underground and then arterial roads – opened up land as it was needed. The expansion of London meant it absorbed towns such as Croydon, Kingston, Harrow and Romford within its boundary. The introduction of the 1947 Town and Country Planning Act, which changed development rights and introduced urban containment policies such as greenbelts saw a change in the way London developed.

D.229 Economic development within the city has developed a distinct geography, as described in the ‘Key Locations’ sub-section of the Economic Potential and Employment section. Current London Plan policies focus on higher density residential growth in town centres as well-served locations for housing growth.

D.230 Opportunity Areas (OAs) refer to long term regeneration and renewal areas. They are the city’s major reservoirs of brownfield land also have significant capacity to accommodate new housing, commercial and other development linked to existing or potential improvements to public transport. OAs are complex and heterogenous, with each OA presenting a different opportunity/challenge and being at a different stage in the development cycle. Established in 2004, OAs make up a significant contribution to housing delivery, with over 39% of completions over the 2023/24 monitoring period (13,301 homes out of a total for the whole of London of 33,389 homes). Many of London’s OAs are either substantially or partially within Flood Zones 2 and 3.

D.231 Due to the scale of growth expected and the limited supply of land, there is an inherent tension between the delivery of housing versus that of other land uses, in particular employment, and competition between them can impact on the spatial and economic structure of the city. How London will accommodate this growth is fundamental to the preparation of the new London Plan. London has been delivering between about 30,000 and 45,000 homes a year for the last decade, rates of housing delivery not seen since the 1970s.

D.232 The current London Plan is based on delivering housing within London’s existing urban extent, with a focus on optimising the use of land including through increased densities. The new national requirements for the number of homes to be delivered and the changed approach to green belt will require the next London Plan to review and release green belt to meet housing and other development needs where those needs cannot be met in other ways, such as redevelopment within London’s existing built area.

Materials and waste

D.233 As London's population grows, waste generation remains a significant challenge, with London currently producing around 6.8 million tonnes of municipal waste annually, (with commercial and industrial waste, construction and demolition waste, and hazardous waste, the overall total is approximately 19 million tonnes of waste annually) [See reference 253] and continued challenges both reducing overall waste generation and meeting recycling targets. While progress has been made in adopting circular economy principles, promoting recycling, and encouraging reuse initiatives since the last London Plan, London's 'household waste' recycling rate has remained relatively static in recent years, hovering around 33% [See reference 254], well below the Mayor's municipal recycling target of 65% by 2030.

D.234 In 2022/23 London sent 5,000 tonnes of Local Authority Collected Waste to Landfill, representing 0.1% of London's total waste, compared to an England average of 7.2% [See reference 255]. Compared to other regions in England, London sent the largest proportion of its total local authority collected waste to incineration in 2022/23 at 65.2%, of which 64.8% included energy recovery. Plants do not sort through the waste before incineration, resulting in large amounts of recyclable materials being unnecessarily incinerated. For example, since not all boroughs of the city offer separate food waste collection, food waste, which could be safely sent through environmentally friendly processes, is instead burnt [See reference 256].

D.235 The share of household waste collected by local authorities that is sent for recycling rate in London has stayed the same for the last three years, at 32.7%. Since 2014/15, London's household waste recycling rate has remained consistently below England's. Nationally, recycling rates in England are slightly higher in 2023/24 than the previous year at 42.3% but remain lower than in 2019/20 [See reference 257]. Tower Hamlets has the lowest recycling rate of 15.8%, while Bromley has the highest rate of 50.9% [See reference 258].

D.236 A number of contributing factors have been identified for this performance including;

- London being a highly diverse and transient city which can make communicating recycling services difficult.
- There are 33 waste collection authorities each delivering their own set of services depending on specific circumstances. This can make things confusing particularly when residents move between boroughs.
- London is a rapidly growing city against a backdrop of limited suitable available space for new housing. Around half of the housing stock is high rise flatted

accommodation with limited easily accessible storage space for recycling compared to separate households served by kerbside collection services.

- London has less garden space than other regions, producing less garden waste that could contribute to recycling performance.
- A continued focus on weight based recycling targets becoming harder to reach with light weighting of materials and less paper in the waste stream with an increasing transition from the paper to digital economy.

D.237 By 2026, London aims to send no biodegradable waste (including food waste) to landfills and by 2030, the city hopes to recycle 65% of its municipal waste. To achieve this, multiple steps have been taken [\[See reference 259\]](#). Minimum recycling standards for waste authorities have been set, including a requirement for separate food waste collection. Multiple schemes have been implemented to reduce packaging waste such as water refill stations to reduce single-use plastic water bottles, working with stakeholders to reduce unnecessary packaging, and spreading awareness among Londoners on how they can reduce their own waste. According to ReLondon's 2024 report [\[See reference 260\]](#):

- Around 2 million tonnes of packaging are consumed and disposed of every year in London – by residents, visitors and businesses – equivalent to almost 250kg per person.
- Only a small proportion of this gets recycled – 44% for household waste and 33% for commercial waste.
- While visitors account for 30% of consumer packaging use in London, they account for 55% of packaging thrown away in street bins as well as in hotels, restaurants and offices.

D.238 The Mayor is not a Waste Planning Authority, a waste collection authority or a waste disposal authority. In London, these statutory responsibilities lie with boroughs, either individually or acting together jointly, and with statutory waste disposal authorities. However, the Mayor is able to exercise strategic oversight through ensuring that:

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

D.239 The Mayor's powers to directly influence waste contracts are limited to the boroughs' contracts for LACW which should be in general conformity with the Mayor's Municipal Waste Strategy. Waste contracts do not respect administrative boundaries and waste flows across boundaries (some of London's waste is currently dealt with in Germany and the Netherlands). In practice, Mayoral intervention focusses on whether contracts support achievement of the Mayor's reduction, recycling and CO₂ reduction targets – not regional self- sufficiency targets.

D.240 The London Waste Map [\[See reference 261\]](#) shows the location and capacity of licensed waste management facilities across London. According to the data from the EA, the number of sites is currently:

- 419 Waste Management Licenses issued. Ref: Environmental Permitting Regulations - Waste Sites Quarterly Summary. December 2025 (data.gov.uk)
- 57 Pollution Prevention and Controls with waste in the activity description Ref: Environmental Permitting Regulations – Industrial Sites Quarterly Summary December 2025 (data.gov.uk)
- 324 sites reporting data to the 2024 Waste Data Interrogator (data.gov.uk).

D.241 In terms of the geographical distribution: a large proportion of waste sites are distributed across east London boroughs such as Barking & Dagenham, Newham and Havering; with significant number of sites also to be found in Bexley in the South, Enfield in the North and Hillingdon in the west of London. Waste sites are safeguarded under London Plan policy; however, many are at risk due to increasing demand for other land uses in particular for new housing.

D.242 London's housing, building and infrastructure are built, maintained and improved with mineral products such as aggregates (crushed rock, sand and gravel, and recycled materials), asphalt, lime, cement and concrete, dimension stone and mortar. Construction in London could not take place without effective supply chains for these key materials and mineral products. Despite a substantial increase in the use of recycled aggregates, it is likely that the major proportion of future aggregate demand will be supplied from primary sources because there are limitations on the availability of material to be recycled into aggregates and technical limitations in their use.

D.243 London is highly reliant upon aggregate imports due to the low amount of potentially available resources and permitted reserves within the Greater London region. Only four boroughs in London have identified land-won sources of primary aggregates – Havering and Redbridge in East London, and Hillingdon and Hounslow in West London. As of 2018, only a small percentage of London's aggregate needs (3-4%) were met from primary production sourced within London due to the very

limited nature of this resource [\[See reference 262\]](#). The largest proportion of sales for sand and gravel for London continues to be provided from marine sources with 3.4mt in 2023.

D.244 London has no crushed rock quarries and is therefore entirely reliant on the supply of crushed rock aggregate from quarries in England and Wales or sources in Scotland and Europe. Deposits of sand and gravel are available within those four boroughs mentioned above. On 31 December 2023, the reserves of sand and gravel in London were 5.27 million tonnes which equates to a landbank of 7.52 years, this is slightly over the minimum seven year landbank required in the London Plan (at least 5mt). This is based on the 0.7mt per annum provision within the London Plan 2021 [\[See reference 263\]](#). Consequently, London is making a sufficient contribution towards the National supply of land won aggregates.

D.245 As a result of this reliance on imported primary aggregates, ensuring that the infrastructure required to support the movement of aggregates into and around the capital is maintained is essential for maintaining an adequate supply – namely, the wharves and rail depots used for this purpose. Transport by rail and water has enormous benefits in terms of reducing the distance material is moved by lorry and associated benefits in air quality, congestion and road safety [\[See reference 264\]](#). Using rail enables large volumes of the ‘aggregates’ needed to make cement and other essential building materials to be brought close to urban construction sites, minimising the use of Heavy Goods Vehicles.

D.246 Approximately 40% of all aggregates used in London are delivered by rail [\[See reference 265\]](#). The rail network in London also supports vital movements of containerised goods as a key link in supply chains serving consumers both in the South East and nationwide. Import and export movements of cars and automotive parts also rely on lines in London, a substantial proportion of the city’s waste is removed by rail, and Heathrow airport is supplied with a fifth of its aviation fuel by cross-London flows of freight trains.

D.247 It is estimated that there are approximately 200 sites, including transfer stations and other sites, that handle construction, demolition, and excavation (CDE) waste. London’s recycled aggregates production is estimated from data collected by the Environment Agency’s Waste Data Interrogator (WDI). The produced figure (three year average of 4.18 million tonnes from 2020 to 2022) relates to waste in London only, while the managed figure (three year average of 4.38 million tonnes from 2020 to 2022) includes waste that is handled within London and includes waste that has been transported into London to be processed. However, the data from the Environment Agency does not capture all CD&E processing activities. The tonnage of recycled aggregates reported in the WDI is likely to only represent a proportion of

the recycled aggregates in circulation. These figures are only estimates and should be treated with caution.

D.248 The demand for sustainable and locally sourced aggregates is expected to grow. The push for green building materials and the Government's net-zero goals mean that recycled and low-impact aggregates will likely play a larger role in projects. Modular and prefabricated construction methods, which often require specific aggregates for offsite production, will further boost demand.

Noise and vibration

D.249 Noise and vibration in London are significant urban challenges, primarily from traffic, construction, and the underground railway, which can impact building integrity and human well-being. However, data on noise levels in London is difficult to obtain. According to a 2022 study, 2,647,600 Londoners were exposed to traffic noise above the WHO guideline of 55dB, the second highest number in any major European study [\[See reference 266\]](#). A level of 57dB represents the 'onset of significant community annoyance'. Hotspots for London noise pollution appear to be on the northern, eastern and western fringes of the capital, notably near Heathrow Airport and around the M25 [\[See reference 267\]](#).

D.250 Aviation noise also affects many people in London. A 2013 report from TfL noted that 766,100 people lived within the ≥ 55 Lden contour of Heathrow and at least another 17,800 people living within the ≥ 55 Lden contour of London City airport. This indicates that aviation noise is a significant environmental issue in London. The number of flights, particularly at night, can affect people's experience of uncomfortable levels of noise. Previous research by countryside charity CPRE suggested that parks in Sutton and Richmond are the capital's quietest, while Enfield, Westminster and Lambeth are the worst affected [\[See reference 268\]](#).

D.251 The World Health Organization (WHO) has claimed that noise pollution is second only to air pollution in terms of environmental health threats in Europe – with around one in three people being negatively affected on the continent. The UK Government estimates that the 'social cost' of the problem totals somewhere between £7 billion and £10 billion every year [\[See reference 269\]](#). Noise disturbance can be associated with health impacts such as sleep disturbance, stress, anxiety, high blood pressure, poor mental health in adults and school performance and cognitive impairment in children. The adverse impacts of that stress are clearly documented, resulting in higher rates of cardiovascular disease and deteriorating mental health.

Water resources and quality

D.252 The Blue Ribbon Network is London's strategic network of water spaces and covers the River Thames, canals, tributary rivers, lakes, reservoirs and docks alongside smaller waterbodies. Every London borough contains some element of the network – 17 boroughs border the Thames and 15 contain canals. Many boroughs contain both rivers and canals.

D.253 The Environment Agency is responsible for water quality and resources – it is their responsibility to decide how much water can be taken from the environment for people and businesses to use, without damaging the environment or compromising existing lawful users and they must also control the volume and quality of discharges made to rivers. Water is supplied to customers in London by four water companies. Thames Water is the largest, the other three (Affinity Water, Essex & Suffolk Water, and Sutton & East Surrey Water) are regional suppliers. The majority (around 70%) of London's water is drawn from rivers, principally the Thames to the west of London and the River Lee in North London. Most of the rest of London's supplies comes from abstracting groundwater.

D.254 The relatively dry nature of the South East, combined with the high population density, especially within London, means that water resources are under significant pressure. This pressure is exacerbated by London not only having one of the highest rates of water use in the country but also having some of the highest rates of leakage from the water supply distribution network. Measures to reduce demand, such as increased water efficiency, reduced leakage and increasing use of water meters are needed throughout London. This will help to manage the supply-demand balance over the short term. However, with a rapidly growing population and some restrictions on water abstraction for environmental reasons, it is also clear that there is a need for new additional water resources in order to maintain a secure water supply-demand balance. The Water Resources South East Regional Plan 2025 includes Thames Water's South East Strategic Reservoir Option and Teddington River Abstraction schemes as two initiatives under development.

D.255 The London catchment has 64 water bodies (made up of 41 rivers, including two River Thames stretches, five surface water transfers, three canals and 15 lakes). The Thames River Basin Management Plan (RBMP), 2022 [\[See reference 270\]](#) measures water quality in these bodies, none are rated as 'very good'. The Ecological status of last assessment (WFD 2022 and 2019) was:

- 41 rivers - Moderate x 35, Poor x 5, Bad x 1
- 49 rivers, SWTs and canals - Good x 1, Moderate x 42, Poor x 5, Bad x 1
- 64 rivers, SWTs, canals and lakes - Good x 4, Moderate x 52, Poor x 7, Bad x 1

D.256 Poor water quality has been attributed to the numerous wrongly corrected sewers and storms in outer London washing unwanted debris and litter. This is a poor reflection of London's waterbodies given that the EU Water Framework Directive aims to get all waterbodies to Good Status or at least to Good Potential. The updated Thames RBMP [\[See reference 271\]](#) provides a summary of the extent of Significant Water Management Issues (SWMIs), as follows:

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

D.257 Many of London's rivers are polluted. This means that our rivers are much less healthy than they should be, and it means that key species like eels and barbel (a freshwater fish) struggle to survive in London's rivers. The London River Health Map presents information collected by various organisations to show how healthy local rivers may be and includes incidences of sewer overflows in the last 48 hours by location, the location of monitoring stations used to monitor water quality [\[See reference 272\]](#).

D.258 The reasons for poor water quality are many and varied. Industrial pollution is quite rare, however the treated effluent from sewage treatment works makes up a significant part of the base flows for some rivers. A significant concern is the numerous wrongly corrected sewers that allow untreated wastewater to discharge into rivers.

D.259 Equally concerning is the impact of storms over the outer London area. This has the effect of washing the urban area, the roofs, streets, footpaths etc. of any dust, debris and litter that has accumulated. This can include significant amounts of hydrocarbons that have dripped or spilt from vehicles onto roads, together with bits of metal and tyre rubber. Any organic matter such as dog faeces will get washed into the rivers, along with other litter than has been left in the open environment.

Appendix E

Assessment criteria for Broad Locations for Growth

E.1 To ensure consistency and transparency when assessing the likely sustainability effects of developing the Green Belt Residential and Industrial Broad Locations for Growth (BLGs) identified by the GLA for consideration in the overall spatial strategy, the IIA framework is supported by a set of site assessment criteria. These criteria, set out in this appendix, were developed by considering the ‘Strategic spatial option questions’ identified for each IIA objective, as presented in the IIA framework at the end of **Chapter 4** in the IIA Report. The criteria show clear, mostly spatial, parameters within which defined effects have been recorded in the assessment of the BLGs (presented in **Appendix F**), based on factors such as the distance of Broad Locations for Growth (BLGs) from sensitive environmental receptors (e.g. designated biodiversity sites or areas of higher landscape sensitivity) and distance to key services and facilities (e.g. service centres or public transport links).

E.2 There are elements of some of the IIA objectives that are cross-cutting, for example IIA objective 4: Successful placemaking includes a need to ensure the provision of accessible green space as that contributes to the enjoyment and enhancement of a place, but access to green space within a new development will also have benefits for climate adaptation (IIA objective 7: Climate change) as well as the health and wellbeing of residents (IIA objective 5: Health and community safety). Therefore, some of the criteria are listed under one IIA objective below, but are not duplicated under another IIA objective, even if they would also be a factor to consider within that objective.

IIA objective 1: Best use of land and resources

Criterion 1.1. Brownfield/greenfield land and the Agricultural Land Classification

Assumptions for judging effects on BLG assessment criteria

E.3 All the residential Broad Locations for Growth (BLGs) have been assumed to achieve very high densities and will therefore represent a more efficient use of land. The appraisal of BLGs in relation to this IIA criterion considers whether the broad location is brownfield or greenfield and also what quality of agricultural land it

comprises. Development on brownfield land represents a more efficient use of land in comparison to the development of greenfield land and presents an opportunity to reuse existing buildings, or under-used buildings.

Residential and industrial BLGs:

- [++] broad location mostly ($\geq 50\%$) comprises brownfield land
- [-] broad location mostly ($\geq 50\%$) comprises greenfield land but which is not classified as Grade 1, 2 or 3 agricultural land
- [--] broad location mostly ($\geq 50\%$) comprises greenfield land classified as Grade 1 or 2 agricultural land
- [--?] broad location mostly ($\geq 50\%$) comprises greenfield land classified as Grade 3 agricultural land. The effect is uncertain due to the data not distinguishing between Grade 3a (best and most versatile) and Grade 3b (not best and most versatile) agricultural land.

Data sources:

- Brownfield Register (London Datastore)
- Agricultural Land Classification (Natural England)

Criterion 1.2. Minerals Safeguarding Area

Assumptions for judging effects on BLG assessment criteria

E.4 It is important that development does not result in the sterilisation of mineral resources and so consideration is given to whether the BLGs are within Minerals Safeguarding Areas or not. The Minerals Safeguarding Areas indicate where the Minerals Planning Authority will need to be consulted on an application, and prior extraction of mineral resources will need to be undertaken before development commences.

Residential and industrial BLGs:

- [0] very little (less than 10%) of broad location is within a Minerals Safeguarding Area
- [-?] at least 10% of broad location is within a Minerals Safeguarding Area. The effect is uncertain, given that the outcome of consultation with the Minerals

Planning Authority (including whether prior extraction would be required and the feasibility of such extraction) is not known at this stage.

Data sources:

- Mineral Safeguarding Area (London Datastore) These are only present in Bexley, Havering, Hillingdon and Redbridge.

Criterion 1.3. Drinking water quality (Source Protection Zones)

Assumptions for judging effects on BLG assessment criteria

E.5 Levels of water consumption within new development will be determined by its design and onsite practices, rather than the location of the BLG. However, the location of development could affect water quality during construction depending on its proximity to Source Protection Zones.

Residential and industrial BLGs:

- [0] all other sites
- [-] at least 10% of the broad location falls within Source Protection Zone 2 or 3
- [--] at least 10% of the broad location falls within Source Protection Zone 1

Data sources:

- Source Protection Zones (Environment Agency)

Criterion 1.4. Surface water quality

Assumptions for judging effects on BLG assessment criteria

E.6 The location of development could also affect water quality during construction depending on its proximity to watercourses and waterbodies. The extent to which water quality is affected would depend on construction techniques and the use of Sustainable Drainage Systems. These practices will be promoted and secured through the detailed design proposals for each broad location at the planning application stage and through other London Plan and relevant Local Plan policies. Therefore, adverse effects are uncertain at this stage.

Residential and industrial BLGs:

- [0] all other sites
- [-?] broad location is within 100m of a watercourse or waterbody
- [--?] broad location contains a watercourse or waterbody

Data sources:

- Watercourses and waterbodies (Ordnance Survey)

IIA objective 2: Housing

Criterion 2.1. Housing delivery

Assumptions for judging effects on BLG assessment criteria

E.7 All residential BLGs are expected to have positive effects on this objective, due to the nature of the proposed development. The broad locations are large enough that it is assumed they will include an element of affordable housing. Industrial BLGs will not contribute towards housing delivery and therefore 2.1. has been scoped out of the appraisal of industrial BLGs.

Residential BLGs:

- [++] all broad locations will deliver at least 3,000 new homes, including a mix of tenures and some affordable housing

Data sources:

- N/A

IIA objective 3: Economic potential

Criterion 3.1. New employment uses

Assumptions for judging effects on BLG assessment criteria

E.8 Industrial broad locations are assumed to deliver a large amount of new employment uses, while residential broad locations are likely to include a mix of uses, some of which will provide employment opportunities.

Residential BLGs:

- [+] residential broad locations will not deliver new industrial land. However, they are likely to be mixed use and therefore will provide some new commercial uses (e.g. retail units, office space).

Industrial BLGs:

- [++] all industrial broad locations will deliver new industrial/logistics land, contributing to new employment uses.

Data sources:

- N/A

Criterion 3.2. Loss or retention of existing employment uses

Assumptions for judging effects on BLG assessment criteria

E.9 This assessment acknowledges that if residential development takes place on areas identified in the London Plan for employment uses, namely Locally Significant Industrial Sites (LSIS) and Strategic Industrial Land (SIL), it may result in the loss of employment land.

Residential BLGs:

- [0] broad location does not contain LSIS or SIL that could be lost to residential development

- [-] broad location contains LSIS and/or SIL that could be lost to residential development

Industrial BLGs:

- [0] broad location does not contain LSIS or SIL
- [+] broad location includes LSIS and/or SIL that are assumed to be retained
- Addresses strategic spatial option questions 1 and 2.

Data sources:

- Locally Significant Industrial Site (London Datastore)
- Strategic Industrial Land (London Datastore)

Criterion 3.3. Proximity to employment uses

Assumptions for judging effects on BLG assessment criteria

E.10 The location of individual BLGs will influence the achievement of this objective by affecting how easily residents can access job opportunities in employment areas (i.e. Locally Significant Industrial Sites, Strategic Industrial Land and the Central Activities Zone). All of the residential BLGs were identified by virtue of their proximity to existing rail and underground stations, specifically within 1,200m which is a reasonable walking distance. Therefore, new residents of a BLG would have access via active travel to stations with frequent services into London and therefore good access to job opportunities.

E.11 The proximity of industrial BLGs to employment areas is not relevant as they will instead provide new job opportunities, and so criterion 3.3. has been scoped out of the appraisal of industrial BLGs.

Residential BLGs:

- [++] all BLGs would have a significant positive effect due to proximity to existing public transport with frequent services to employment areas within London

Data sources:

- Existing rail and underground stations (GLA)

IIA objective 4: Successful placemaking

Criterion 4.1. Integration with existing neighbourhoods/settlements

Assumptions for judging effects on BLG assessment criteria

E.12 Appropriate design of new development at residential BLGs could help to integrate them with existing neighbourhoods/settlements. Industrial BLGs will not affect integration with existing neighbourhoods/settlements and therefore criterion 2.1. has been scoped out of the appraisal of industrial BLGs.

Residential BLGs:

- [?] The successful integration of new development within existing neighbourhoods or settlements will depend on the detailed design of the residential scheme, rather than solely on its spatial location, which remains uncertain at this stage.

Data sources:

- N/A

Criterion 4.2. Mix of uses

Assumptions for judging effects on BLG assessment criteria

E.13 Residential BLGs will likely provide a mix of uses and facilities, helping achieve this criterion, while industrial BLGs will likely include infrastructure development to support growth.

Residential BLGs:

- [++] all residential broad locations are assumed to provide a mix of uses and facilities

Industrial BLGs:

- [+] industrial BLGs may help to ensure utilities / digital infrastructure (e.g. data hubs) can support the scale of London's future development

Data sources:

- N/A

Criterion 4.3. Landscape**Assumptions for judging effects on BLG assessment criteria**

E.14 Due to the scale of development at the broad locations, it is likely development would have adverse effects on the character and sensitivity of the landscape. All broad locations are expected to have adverse effects, particularly if they fall within important views. However, actual effects are uncertain as development could also enhance the landscape if it contains buildings of architectural interest and well-designed landscaping and green infrastructure.

E.15 The assumptions outlined below are intended to provide a basis for screening for the potential for adverse effects on the landscape, but in the absence of a landscape sensitivity study for all BLGs (and detailed design and layout proposals which will not be available until allocation of sites through Local Plans, then subsequent masterplanning and planning applications), effects identified by this IIA are subject to a high degree of uncertainty.

Residential and industrial BLGs:

- [-?] due to the scale of development, all BLGs are expected to have some negative effects on the landscape
- [--?] broad location falls within a protected vista or contains an area of special residential character

Data sources:

- Protected vistas (London Datastore)

Criterion 4.4. Open space

Assumptions for judging effects on BLG assessment criteria

E.16 Public health is influenced by people's proximity to open spaces, as this can encourage participation in active outdoor recreation. Therefore, proximity to existing open space is relevant. However, it is also assumed that all residential BLGs would provide sufficient new open space to meet the national guidance of 3ha open space/1,000 people calculated for the number of new residents the development will provide.

E.17 The GLA methodology for identifying the potential industrial BLGs did not assume development would occur on land that is designated or undesignated public open space (as identified by GiGL) within the BLGs. Therefore, criterion 4.4. has been scoped out of the appraisal of industrial BLGs.

Residential BLGs:

- [++] broad location will provide sufficient new open space to ensure new residents are within a five minute walk (400m) of a designated open space

Data sources:

- N/A

IIA objective 5: Health and community safety

E.18 Some aspects of improving health and community safety are captured by criteria 4.1, 4.2 and 4.4 above, as integrating with existing neighbourhoods/settlements, providing a mix of uses and sufficient accessible green space would enable new residents to feel safer, encourage them to use active travel to access local services and facilities and enjoy the benefits of green space for mental and physical wellbeing. These criteria have not been repeated in this objective to avoid double counting of IIA effects.

Criterion 5.1. Noise pollution

Assumptions for judging effects on BLG assessment criteria

E.19 Regular exposure to noise from road, rail and aircrafts can have adverse effects on people's wellbeing. Ensuring residential BLGs are not close to these pollution sources will help reduce noise exposure. It is assumed that industrial BLGs will themselves produce some noise and workers are likely to wear ear protection and only be exposed to noise during the working day.

Residential BLGs:

- [-] at least 25% of broad location experiences daytime and evening road and rail noise pollution of 55.0-59.9dB or more or night-time road and rail noise pollution of 50-54.9dB
- [--] at least 25% of broad location experiences daytime and evening road and rail noise pollution of 60.0dB or more or night-time road and rail noise pollution of 55.0dB or more, and/or at least 25% of broad location is within an aircraft noise contour above 45dB (for London City airport) or above 55.0dB (for Heathrow airport)

Industrial BLGs:

- [-] at least 25% of broad location experiences daytime road and rail noise pollution of 55.0-59.9dB
- [--] at least 25% of broad location experiences daytime road and rail noise pollution of 60.0dB or more, and/or at least 25% of broad location is within an aircraft noise contour above 45dB (for London City airport) or above 55dB (for Heathrow airport)

Data sources:

- Lday/Leve/Lnight noise from road and rail (Defra)
- Aircraft noise contours for Heathrow and London City (Defra, TfL)
- Note that noise contours for London Stansted do not reach as far south as the Greater London boundary [\[See reference 273\]](#), nor do Gatwick's reach as far north [\[See reference 274\]](#).

Criterion 5.2. Air pollution

Assumptions for judging effects on BLG assessment criteria

E.20 The site assessment criteria consider whether broad locations contain areas of poor air quality and so could expose new residents to air pollution and its attendant health risks. The assessment does not take into account planned or implemented measures that will improve future air quality (such as expansion of the Ultra Low Emission Zone across all London boroughs in 2023 and the ban on the sale of new petrol and diesel cars in the UK from 2030).

E.21 Consideration is given to Air Quality Focus Areas (AQFAs), not Air Quality Management Areas (AQMAs) as AQMAs cover most of Greater London and so distinctions cannot be easily made in terms of differing pollution levels. AQFAs experience poor air quality and have been identified as areas where currently planned measures to reduce air pollution may not fully resolve poor air quality issues. As with noise, it is assumed that industrial BLGs will themselves produce some noise and workers are likely to wear ear protection and only be exposed to noise during the working day.

Residential and industrial BLGs:

- [0] less than 10% of broad location comprises an Air Quality Focus Area
- [--] at least 10% of broad location comprises an Air Quality Focus Area

Data sources:

- Air Quality Focus Areas (London Datastore)

Criterion 5.3. Healthcare facilities

Assumptions for judging effects on BLG assessment criteria

E.22 Residential broad locations close to existing healthcare facilities (i.e. GP surgeries and pharmacies) will help to ensure that residents have good access to healthcare services, particularly as pharmacies are now authorised to diagnose and prescribe medication for a number of common conditions. However, there is not a consistent dataset available to determine proximity to existing healthcare facilities. It is also unknown whether there is sufficient capacity at existing GP surgeries to

accommodate new residents. However, the scale of the residential broad locations will likely support the provision of additional healthcare capacity. The access industrial BLGs have to healthcare facilities is not relevant, although it is acknowledged that workers can utilise pharmacies before and after work and during lunch breaks. Therefore, criterion 5.3 has been scoped out of the appraisal of industrial BLGs.

Residential BLGs:

- [?] it is uncertain what effect the BLGs will have on access to healthcare facilities

Data sources:

- GP surgery/pharmacy/ healthcare facility data unavailable at the regional scale

IIA objective 6: Equality of opportunity

Criterion 6.1. Deprivation

Assumptions for judging effects on BLG assessment criteria

E.23 Greater London contains numerous Lower layer Super Output Areas (LSOAs) that fall within the most deprived areas in England. BLGs that fall within the most deprived areas of London have the potential to help regenerate those areas through development and the delivery of supporting infrastructure.

Residential and industrial BLGs:

- [++] at least 10% of the broad location is within one of the 10% most deprived areas nationally
- [+] at least 10% of the broad location is within one of the 20% most deprived areas nationally

Data sources:

- Index of Multiple Deprivation 2025 (GOV.UK)

Criterion 6.2. Schools

Assumptions for judging effects on BLG assessment criteria

E.24 Due to the scale of the broad locations, it is assumed that additional residential BLGs will support the provision of additional school capacity. Industrial BLGs will not contribute towards additional school capacity and therefore criterion 6.2. has been scoped out of the appraisal of industrial BLGs.

Residential BLGs:

- [+] it is assumed that development at all residential BLGs will include sufficient school provision

Data sources:

- N/A

IIA objective 6: Climate change

Criterion 7.1. Climate change mitigation

Assumptions for judging effects on BLG assessment criteria

E.25 The proximity of the broad locations to public transport will affect the extent to which people are able to make use of public transport to access services, facilities and job opportunities, although the actual use of public transport will depend on people's behaviour. All of the residential BLGs were identified by virtue of their proximity to existing rail and underground stations, specifically within 1,200m which is a reasonable walking distance. Therefore, new residents of a BLG would have access via active travel to stations with frequent services into London and this could reduce journeys by car.

Residential and industrial BLGs:

- [++] all BLGs would have a significant positive effect due to proximity to existing public transport with frequent services that would encourage more journeys by public transport and reduce greenhouse gas emissions

Data sources:

- Rail and underground stations (GLA)

Criterion 7.2. Carbon storage

Assumptions for judging effects on BLG assessment criteria

E.26 Habitats such as woodlands, grasslands, wetlands and the saline and estuarine habitats of the Thames play direct roles in carbon sequestration and long-term carbon storage, supporting reductions in London's CO₂ emissions. Protecting and expanding these habitats and providing appropriate management are key aims within the London Environment Strategy. Where BLGs contain or are adjacent to areas of relevant habitats, there could be opportunities to retain, extend or enhance those habitats. However, the extent to which BLGs will include opportunities to do this, or create new habitats is unknown at this stage, as that will depend on the design, layout and proposals for retention and enhancement, or creation of habitats which come forward at the planning application stage.

Residential and industrial BLGs:

- [++] BLGs may be able to retain, extend, enhance existing habitats or create new habitats that contribute to carbon storage, but this is uncertain at this stage.

Data sources:

- N/A

Criterion 7.3. Heat networks

Assumptions for judging effects on BLG assessment criteria

E.27 Large-scale residential/mixed use development and industrial/logistics development at broad locations has the potential to connect into existing and/or create new low carbon heat networks if they are in areas identified through the latest National Zoning Model where heat networks are likely to provide the lowest cost option for decarbonising heat. Industrial BLGs may also have potential to produce waste heat and supply heat to other developments.

Residential and industrial BLGs:

- [-] broad location is not located within 100m of an indicative heat network zone
- [+] broad location is within 100m of an indicative heat network zone
- [++] broad location contains an indicative heat network zone

Data sources:

- National Zoning Model (NRM0.5) (supplied by DESNZ, March 2026). Note that While the NMR0.5 outputs are based upon a model which has undergone significant development and quality assurance, the outputs are still subject to change ahead of the government's zoning policy launch.

Criterion 7.4. Climate change adaptation**Assumptions for judging effects on BLG assessment criteria**

E.28 England is more likely to experience warmer and wetter winters as a result of climate change. This will result in an increased risk of flooding from rivers and the sea, in addition to flash flooding. The extent to which flood risk can be managed and reduced due to the locations of BLGs in relation to Flood Zones is therefore considered within the assessment.

Residential and industrial BLGs:

- [0] <30% of broad location is located within an area at risk of fluvial or surface water flooding
- [-] ≥30% of broad location is located within an area at moderate risk of fluvial or surface water flooding
- [--] ≥30% of broad location is located within an area at high risk of fluvial or surface water flooding

Data sources:

- National Flood Risk Assessment (Environment Agency)

IIA objective 8: Biodiversity and geodiversity

Criterion 8.1. International and national biodiversity and geodiversity assets

Assumptions for judging effects on BLG assessment criteria

E.29 Broad locations that contain or are close to internationally or nationally designated sites, have the potential to affect the biodiversity or geodiversity of those sites/features, e.g. through habitat damage/loss, fragmentation, disturbance to species, air pollution, or increased recreation pressure. Conversely, there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity of broad locations to designated sites provides an indication of the potential for an adverse effect, appropriate mitigation may avoid adverse effects and may even result in beneficial effects. Therefore, some uncertainty is expected. The separate Habitats Regulations Assessment also considers the potential for different types of impact pathways from broad locations to have a significant effect on Special Areas of Conservation, Special Protection Areas and Ramsar sites.

Residential and industrial BLGs:

- [0?] broad location is not within 1,000m of an internationally or nationally designated site
- [-?] broad location is within 250-1,000m of an internationally or nationally designated site
- [--?] broad location contains an internationally or nationally designated site or is within 250m of one

Data sources:

- Special Areas of Conservation (Natural England)
- Special Protection Areas (Natural England)
- Ramsar sites (Natural England)
- Sites of Special Scientific Interest (Natural England)
- National Nature Reserves (Natural England)

Criterion 8.2. Local biodiversity and geodiversity assets

Assumptions for judging effects on BLG assessment criteria

E.30 Broad locations that contain or are close to locally designated nature conservation sites, ancient woodland and priority habitats also have the potential to affect the biodiversity of those sites and features. Conversely, there may be opportunities to promote biodiversity if new developments incorporate green infrastructure. Therefore, all effects are uncertain.

Residential and industrial BLGs:

- [0?] broad location is not within 250m of a locally designated site, ancient woodland or priority habitat
- [-?] broad location is within 250m of a locally designated site, ancient woodland or priority habitat
- [--?] broad location contains a locally designated site, ancient woodland or priority habitat

Data sources:

- Local Wildlife Site (London Datastore) (also referred to as Sites of Importance for Nature Conservation, Sites of Nature Conservation Interest, Sites of Metropolitan/Borough/Local Importance)
- Local Nature Reserves (Natural England)
- Ancient woodland (Natural England)
- Priority habitat inventory (Natural England)

Criterion 8.3. Areas that could become important for biodiversity

Assumptions for judging effects on BLG assessment criteria

E.31 Residential broad locations that contain areas that could become important for biodiversity (ACB) could help retain or enhance those areas and support nature recovery. Therefore, consideration is given to the presence of ACBs in the broad locations, and their proximity to them.

Residential BLGs:

- [++] broad location contains an ACB (area that could become important for biodiversity). It is assumed the development would have potential to retain/enhance it and support nature recovery
- [+] broad location is within 250m of an ACB. It is assumed the development would have potential to contribute to enhancing it and support nature recovery
- [0] broad location does not contain and is not within 250m of an ACB as identified in the LNRS

Industrial BLGs:

- [--] broad location contains an ACB (area that could become important for biodiversity). It is assumed industrial development would be less likely/able to support nature recovery
- [-] broad location is within 250m of an ACB. It is assumed industrial development would be less likely/able to support nature recovery
- [0] broad location does not contain and is not within 250m of an ACB as identified in the LNRS

Data sources:

- ACBs from Local Nature Recovery Strategy (GiGL)

IIA objective 9: Historic environment

Criterion 9.1. Historic environment

Assumptions for judging effects on BLG assessment criteria

E.32 The significance of a designated or non-designated heritage asset can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. However, development could also enhance the significance of the asset, provided that the development preserves those elements of the setting that make a positive contribution to or better reveal the significance of the asset. In all cases, effects from a broad location will be subject to a degree of uncertainty as the actual effects on heritage assets will depend on the particular scale, design and layout of the new development and opportunities which may exist to enhance the

setting of heritage features, for example where sympathetic development replaces a derelict brownfield site which is currently having an adverse effect.

E.33 The proximity tests outlined below are intended to provide a basis for screening for the potential for adverse effects on heritage assets but in the absence of a historic environment sensitivity study or similar for all BLGs, effects identified by the IIA are subject to a high degree of uncertainty.

Residential and industrial BLGs:

- [0?] broad location is further than 250m of a heritage asset (or its buffer zone) or archaeological priority areas
- [-?] broad location is within 101-250m of a heritage asset (or its buffer zone) or an archaeological priority area
- [--?] broad location contains or is within 100m of a heritage asset (or its buffer zone) or an archaeological priority area.

Data sources:

- Conservation areas (GLA)
- Listed buildings (Historic England)
- Scheduled monuments (Historic England)
- Registered parks and gardens (Historic England)
- World Heritage Sites (Historic England)
- Archaeological Priority Areas (London Datastore)

Appendix F

Integrated Impact Assessment findings for the Green Belt Broad Locations for Growth

F.1 The GLA identified a number of potential residential and industrial BLGs in the Green Belt that could be developed to help meet the required growth over the plan period. The indicative locations of these BLGs can be seen in **Figures F.1, F.2 and F.3**. There are two different groups of residential BLGs, the first of which is based on a 10-year time horizon and the second of which is based on a 20-year time horizon. There are more BLGs in the 20-year time horizon than the 10-year time horizon, as it is anticipated that more places could be plausibly unlocked by infrastructure decisions in a 20-year period. However, pending additional work on scoping and funding of those interventions and other mitigation, eight of these are only candidate future BLGs rather than being a definite part of the spatial strategy, and the extent of four of them also relies on further as yet uncertain strategic mitigations work and/or investment.

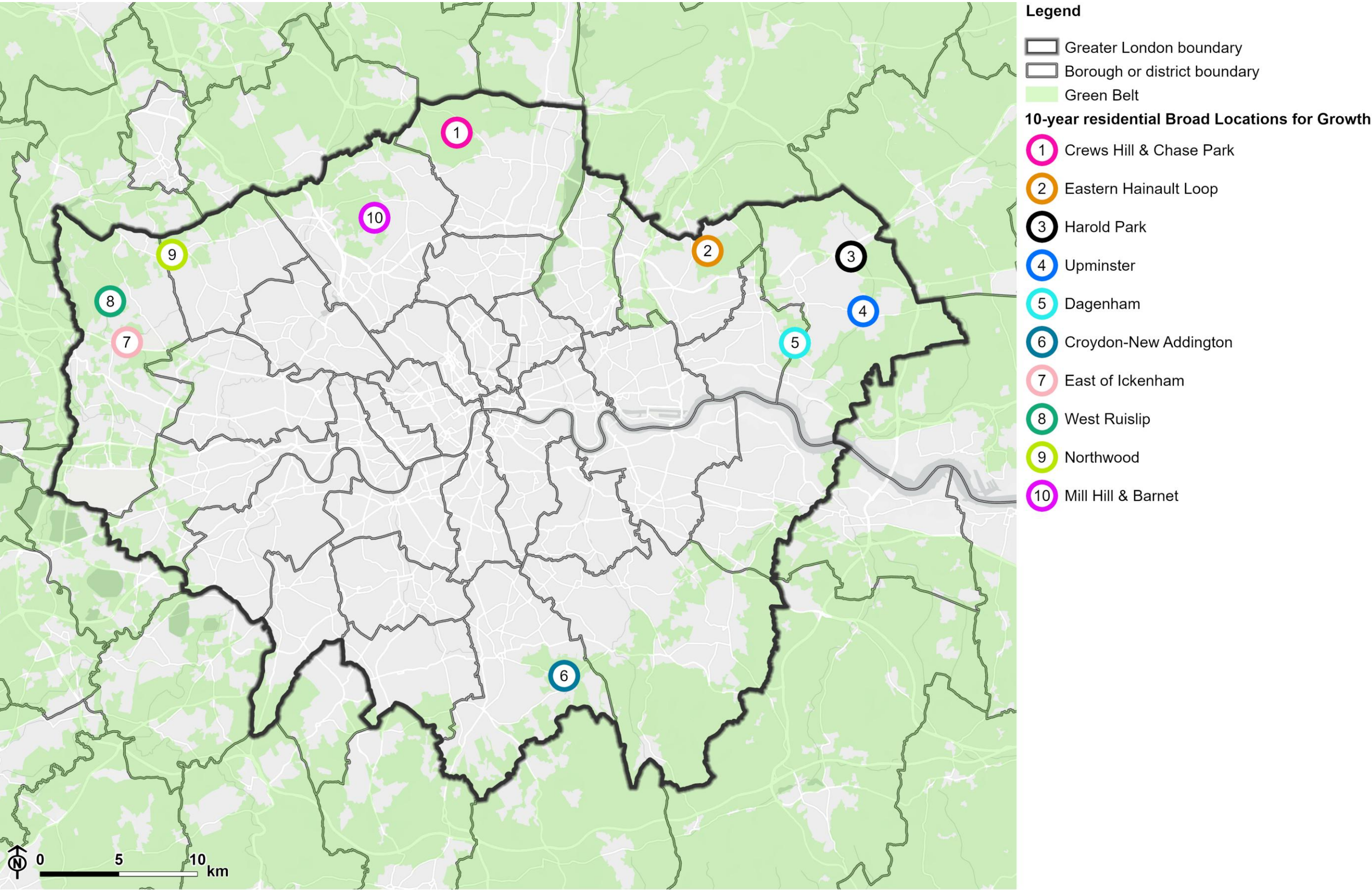
F.2 To ensure consistency and transparency when assessing the BLGs, a set of assessment criteria were developed. These criteria set out clear, mostly spatial parameters within which defined effects can be recorded, based on factors such as the distance of the BLGs from sensitive environmental receptors amongst other things. The assessment criteria and datasets referred to in the IIA for the BLGs are presented in **Appendix E**. As explained in **Chapter 2**, it should be noted that the approach the GLA took to identifying the BLGs and estimating the capacity for residential, mixed use or industrial growth that could be provided within each BLG involved excluding areas within the buffers around stations and SRNs that are affected by primary constraints. These include physical and statutory limitations on development potential e.g. due to environmental protections, flood risk or existing land uses such as highways. By taking this approach, the GLA sought to anticipate and proactively manage many potential environmental impacts that might be identified through this IIA, noting that a strategic-scale plan assessment such as the London Plan IIA cannot determine the site-specific likely effects of individual development proposals. However, these will be able to be explored in more detail through the SA/SEA or IIA of Local Plans, as more specific site allocations are proposed within the BLGs.

F.3 It should also be noted that brownfield BLGs have not been appraised, because they are already established locations for growth and will all have very similar impacts. Instead, redevelopment of brownfield BLGs has been appraised as part of the overall spatial strategy options in **Chapter 5**. Finally, the scope of assessment is

fairly limited given the strategic and indicative nature of these spatial options as part of a strategic plan, hence not all objectives are easily assessed, and would be assessed in more detail through Local Plan IIAs as more detailed site allocations are identified.

F.4 The likely effects of the 10-year residential, 20-year residential and industrial Green Belt BLGs against the IIA objectives are presented in **Tables F.2, F.3 and F.4** respectively and described below the tables.

Figure F.1: 10-year residential Broad Locations for Growth



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Table F.1: IIA findings for the 10-year residential Broad Locations for Growth

IIA objective	IIA assessment criterion	Crews Hill & Chase Park	East of Ickenham	Eastern Hainault Loop	Harold Park	Mill Hill & Barnet	Croydon-New Addington	Northwood	West Ruislip	Dagenham	Upminster
IIA objective 1: Best use of land and resources	1.1. Brownfield/greenfield land and the Agricultural Land Classification	--?	-	-	--?	-	--?	-	--?	-	--?
IIA objective 1: Best use of land and resources	1.2. Minerals Safeguarding Area	0	0	-?	-?	0	0	0	0	-?	-?
IIA objective 1: Best use of land and resources	1.3. Drinking water quality (Source Protection Zones)	0	-	0	0	0	--	--	--	--	0
IIA objective 1: Best use of land and resources	1.4. Surface water quality	--?	--?	--?	--?	--?	0	--?	--?	--?	--?
IIA objective 2: Housing	2.1. Housing delivery	++	++	++	++	++	++	++	++	++	++
IIA objective 3: Economic potential	3.1. New employment uses	+	+	+	+	+	+	+	+	+	+
IIA objective 3: Economic potential	3.2. Loss of existing employment uses	0	0	0	0	0	0	0	0	0	0
IIA objective 3: Economic potential	3.3. Proximity to employment uses	++	++	++	++	++	++	++	++	++	++
IIA objective 4: Successful placemaking	4.1. Integration with existing neighbourhoods/ settlements	?	?	?	?	?	?	?	?	?	?
IIA objective 4: Successful placemaking	4.2. Mix of uses	++	++	++	++	++	++	++	++	++	++
IIA objective 4: Successful placemaking	4.3. Landscape	-?	-?	--?	-?	-?	--?	--?	-?	-?	-?
IIA objective 4: Successful placemaking	4.4. Open space	++	++	++	++	++	++	++	++	++	++
IIA objective 5: Health and community safety	5.1. Noise pollution	0	--	0	0	0	0	0	0	0	0
IIA objective 5: Health and community safety	5.2. Air pollution	0	0	0	0	0	0	0	0	0	0
IIA objective 5: Health and community safety	5.3. Healthcare facilities	?	?	?	?	?	?	?	?	?	?
IIA objective 6: Equality of opportunity	6.1. Deprivation	0	0	0	0	0	+	0	0	0	0
IIA objective 6: Equality of opportunity	6.2. Schools	+	+	+	+	+	+	+	+	+	+
IIA objective 7: Climate change	7.1. Climate change mitigation	++	++	++	++	++	++	++	++	++	++

IIA objective	IIA assessment criterion	Crews Hill & Chase Park	East of Ickenham	Eastern Hainault Loop	Harold Park	Mill Hill & Barnet	Croydon-New Addington	Northwood	West Ruislip	Dagenham	Upminster
IIA objective 7: Climate change	7.2 Carbon storage	+	+	+	+	+	+	+	+	+	+
IIA objective 7: Climate change	7.3 Heat networks	+	-	++	-	-	-	+	-	-	-
IIA objective 7: Climate change	7.4. Climate change adaptation	0	0	0	0	0	0	0	0	0	0
IIA objective 8: Biodiversity and geodiversity	8.1. International and national biodiversity and geodiversity assets	0?	-?	0?	0?	0?	-?	--?	--?	0?	-?
IIA objective 8: Biodiversity and geodiversity	8.2. Local biodiversity and geodiversity assets	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?
IIA objective 8: Biodiversity and geodiversity	8.3. Areas that could become important for biodiversity	++	++	++	++	++	++	++	++	++	++
IIA objective 9: Historic environment	9.1. Heritage assets and archaeological priority areas	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?

Appraisal of the 10-year residential greenbelt Broad Locations for Growth

IIA objective 1: Best use of land and resources

Criterion 1.1. Brownfield/greenfield land and the Agricultural Land Classification

F.5 The development of brownfield land represents a more efficient use of land in comparison to the development of greenfield land and presents an opportunity to reuse existing buildings or under-used buildings. However, by definition, none of the 10-year green belt residential BLGs are majority brownfield. In addition, Crews Hill & Chase Park, Harold Park, Croydon-New Addington, West Ruislip and Upminster largely comprise land classified as Grade 3 agricultural land (i.e. good to moderate quality agricultural land). Due to the loss of good to moderate quality agricultural land, these BLGs are expected to have significant negative but uncertain effects against IIA assessment criterion 1.1. The effects are recorded as uncertain due to the absence of data that distinguishes between Grades 3a (best and most versatile) and 3b (not best and most versatile) agricultural land. The remaining 10-year residential BLGs comprise land not classified as Grades 1, 2 or 3 agricultural land. However, due to the fact they comprise greenfield land they are expected to have minor negative effects against IIA assessment criterion 1.1.

Criterion 1.2. Minerals Safeguarding Area

F.6 Minerals Safeguarding Areas indicate where the Minerals Planning Authority will need to be consulted on an application and prior extraction of mineral resources will need to be undertaken before development commences. This is important to ensure that development does not result in the sterilisation of mineral resources. The Eastern Hainault, Harold Park, Dagenham and Upminster 10-year residential BLGs are each located, at least in part, within a Minerals Safeguarding Area. As such, they are expected to have a minor negative but uncertain effects against IIA assessment criterion 1.2. The effects are recorded as uncertain, given that the outcome of consultation with the Minerals Planning Authority (including whether prior extraction would be required and the feasibility of such extraction) is not known at this stage. The remaining 10-year residential BLGs are expected to have negligible effects against IIA assessment criterion 1.2.

Criterion 1.3. Drinking water quality (Source Protection Zones)

F.7 The location of development may affect water quality during construction depending on its proximity to Source Protection Zones. At least 10% of the Croydon-New Addington, Northwood, West Ruislip and Dagenham 10-year residential BLGs fall within Source Protection Zone 1. Therefore, they are expected to have significant negative effects in relation to IIA assessment criterion 1.3. The East of Ickenham 10-year residential BLG is partially located within Source Protection Zones 2 and 3 and therefore is expected to have a minor negative effect against IIA assessment criterion 1.3. The remaining residential BLGs are expected to have negligible effects.

Criterion 1.4. Surface water quality

F.8 The proximity of BLGs to watercourses and waterbodies can influence their effect on water quality. The extent of the impact is also dependent on the use of Sustainable Drainage Systems (SuDS) and construction techniques, to be secured through the planning application process. Therefore, all adverse effects are uncertain. All of the 10-year residential BLGs, with the exception of Croydon-New Addington, contain a watercourse or waterbody. As such, development at these locations could impact surface water quality. Therefore, all of the 10-year residential BLGs, with the exception of Croydon-New Addington, are expected to have significant negative but uncertain effects against IIA assessment criterion 1.4. Croydon-New Addington is expected to have a negligible effect.

IIA objective 2: Housing

Criterion 2.1. Housing delivery

F.9 All residential BLGs will deliver at least 3,000 new homes, which will include a mix of tenures and an affordable housing contribution. As the BLGs exclude any areas of existing housing, their development will not result in any loss of housing. All 10-year residential broad locations are expected to have significant positive effects against IIA assessment criterion 2.1.

IIA objective 3: Economic potential

Criterion 3.1. New employment uses

F.10 While the 10-year residential broad locations will not deliver new industrial land, it is expected that around 30% of each broad location will be available for uses other than residential, including employment-generating uses. Therefore, minor positive effects are expected for all 10-year residential locations in relation to IIA assessment criterion 3.1.

Criterion 3.2. Loss of existing employment uses

F.11 Eastern Hainault, Harold Park and Dagenham contain very small areas of land designated as a Locally Significant Industrial Site (LSIS). As the overlap is minimal, allocating residential development at these locations is not considered likely to limit opportunities for new employment uses. As such, all 10-year residential BLGs are expected to have negligible effects against IIA assessment criterion 3.2.

Criterion 3.3. Proximity to employment uses

F.12 The location of BLGs will influence how easily residents can access employment opportunities. All BLGs are within walking distance of public transport networks that provide strong connections to Central London and other key employment areas. This level of accessibility supports efficient travel to a wide range of job opportunities. As such, all 10-year residential BLGs are expected to have significant positive effects against IIA assessment criterion 3.3.

IIA objective 4: Successful placemaking

Criterion 4.1. Integration with existing neighbourhoods/ settlements

F.13 Appropriate design of new development at residential BLGs could help to integrate them with existing neighbourhoods/settlements. However, the successful integration of new development within existing neighbourhoods or settlements will depend on the detailed design of the residential scheme, rather than solely on its spatial location, which remains uncertain at this stage. As such, all 10-year residential BLGs are expected to have uncertain effects against IIA assessment criterion 4.1.

Criterion 4.2. Mix of uses

F.14 It is expected that around one third of the land within each residential BLG will be available for a mix of uses and facilities, helping to create new communities with access to employment, services and facilities. Therefore, all 10-year residential BLGs are expected to have significant positive effects against IIA assessment criterion 4.2.

Criterion 4.3. Landscape

F.15 Due to the scale of future development, it is likely that development at all BLGs would have adverse effects on the character and sensitivity of the landscape, particularly if they fall within important views. Conversely, development could enhance the landscape and residential character if it introduces high-quality design and green infrastructure. In the absence of landscape sensitivity studies for all BLGs, or detail of specific development proposals, the likely effects against IIA assessment criterion 4.3 are subject to a high degree of uncertainty.

F.16 Eastern Hainault BLG falls within the Westminster Pier to St Paul's Cathedral protected vista, while Croydon-New Addington BLG coincides with three protected vistas: Alexandra Palace viewing terrace to St Paul's Cathedral, Parliament Hill summit to the Palace of Westminster, and Parliament Hill oak tree to Palace of Westminster. Northwood BLG falls within the Greenwich Park Wolfe statue to Tower Bridge protected vista. Due to the potential for development to have a direct impact on protected views, these three BLGs are expected to have significant negative but uncertain effects against IIA assessment criterion 4.3. The remaining residential BLGs do not coincide with any protected vistas but due to their scale, are expected to have a minor negative but uncertain effects.

Criterion 4.4. Open space

F.17 Proximity to existing open spaces and provision of new ones can encourage participation in active outdoor recreation, improving public health and helping to create high quality new developments and successful places. All 10-year residential BLGs are assumed to provide sufficient accessible green space to meet the national standards of 3ha/1,000 people. Therefore, likely significant positive effects are expected for all 10-year residential BLGs against IIA assessment criterion 4.4.

IIA objective 5: Health and community safety

Criterion 5.1. Noise pollution

F.18 More than 25% of East of Ickenham is expected to experience daytime road and rail noise pollution of 60.0dB or more, while 25% of the BLG is also expected to experience night-time road and rail noise pollution of 55.0dB or more. This would likely cause some disruption to new residents, with potential adverse effects on their health and wellbeing. As such, this BLG is expected to have a significant negative effect against IIA assessment criterion 5.1. None of the 10-year residential BLGs are expected to experience noise pollution associated with aircrafts. The remaining 10-year residential BLGs are expected to have negligible effects against IIA assessment criterion 5.1.

Criterion 5.2. Air pollution

F.19 None of the 10-year residential BLGs overlap an Air Quality Focus Area by over 10%. Only East of Ickenham and Eastern Hainault BLGs intersect one at all (4% overlap each). As such, all 10-year residential BLGs are expected to have negligible effects against IIA assessment criterion 5.2.

Criterion 5.3. Healthcare facilities

F.20 Residential BLGs near existing healthcare facilities will support good access to healthcare services for residents. However, there is no consistent dataset available to determine the proximity of the BLGs to existing healthcare facilities. The available capacity of existing healthcare facilities such as GP surgeries is also not known. Notwithstanding this, the scale of the 10-year residential BLGs is expected to accommodate the provision of new healthcare facilities to meet the increased demand. All 10-year residential BLGs are expected to have uncertain effects against IIA assessment criterion 5.3.

IIA objective 6: Equality of opportunity

Criterion 6.1. Deprivation

F.21 At least 10% of the Croydon-New Addington BLG falls within one of the 20% most deprived areas nationally. Directing new development to more deprived areas has the potential to support economic growth and regeneration. As such, the

Croydon-New Addington BLG is expected to have a minor positive effect against IIA assessment criterion 6.1. The remaining 10-year residential BLGs are expected to have negligible effects against IIA assessment criterion 6.1.

Criterion 6.2. Schools

F.22 Due to the scale of the 10-year residential broad locations and their delivery of at least 3,000 new homes each, it is expected that they will support the provision of additional school capacity, benefitting new and existing communities who live within the vicinity of each BLG. All 10-year residential BLGs are therefore expected to have minor positive effects against IIA assessment criterion 6.2.

IIA objective 7: Climate change

Criterion 7.1. Climate change mitigation

F.23 All BLGs are within walking distance of public transport networks. This high level of accessibility encourages the use of sustainable transport modes and reduces reliance on private car travel, contributing to lower emissions. As such, all 10-year residential BLGs are expected to have significant positive effects against IIA assessment criterion 7.1.

Criterion 7.2. Carbon storage

F.24 Habitats such as woodlands, grasslands, wetlands and the saline and estuarine habitats of the Thames play direct roles in carbon sequestration and long-term carbon storage, supporting reductions in London's CO₂ emissions. Protecting and expanding these habitats and providing appropriate management are key aims within the London Environment Strategy. Where BLGs contain or are adjacent to areas of relevant habitats, there could be opportunities to retain, extend or enhance those habitats. However, the extent to which BLGs will include opportunities to do this, or create new habitats is unknown at this stage, as that will depend on the design, layout and proposals for retention and enhancement, or creation of habitats which come forward at planning application stage. All 10-year residential BLGs are therefore expected to have minor positive but uncertain effects against IIA assessment criterion 7.2.

Criterion 7.3. Heat networks

F.25 Large-scale development within residential broad locations may be able to connect to existing and/or create new low carbon heat networks if they are in areas identified through the latest National Zoning Model (NRM0.5) where heat networks are likely to provide the lowest cost option for decarbonising heat. As such, some of the 10-year residential BLGs could offer opportunities to link development to efficient, resilient local zero-carbon heat sources. Eastern Hainault overlaps (2%) with an existing low carbon heat network zone, which may have opportunities for development to link to an existing or future heat network. A significant positive effect is therefore expected against IIA assessment criterion 7.3. Crews Hill & Chase Park and Northwood BLGs are situated within 100m of a low carbon heat network zone and therefore are expected to have minor positive effects. The remaining 10-year residential BLGs are over 100m from a heat network zone so are less well-located to areas where existing or future heat networks are likely to provide the lowest cost option for decarbonising heat. As such, they are expected to have minor negative effects against IIA assessment criterion 7.3.

Criterion 7.4. Climate change adaptation

F.26 Climate change is expected to increase the frequency and severity of flooding events. The extent to which this risk can be managed is influenced by the location of residential BLGs in relation to watercourses and areas susceptible to flooding. All 10-year residential BLGs have less than a 30% overlap with an area at medium or high risk of fluvial or surface water flooding, indicating limited exposure to flood risk and sufficient scope for mitigation measures to be implemented within the area expected to be available for non-residential uses. While there may be other areas of high flood risk in the vicinity, such land was not assumed to yield residential capacity within the GLA evidence studies which identified the BLGs. Therefore, all 10-year BLGs are expected to have negligible effects against IIA assessment criterion 7.4.

IIA objective 8: Biodiversity and geodiversity

Criterion 8.1. International and national biodiversity and geodiversity assets

F.27 Broad locations in close proximity to internationally or nationally designated sites have the potential to affect the biodiversity or geodiversity of those sites. Both Northwood and West Ruislip 10-year residential BLGs are within 250m of Ruislip Woods SSSI and therefore have the potential to cause direct or indirect physical

harm to this protected area. As such, Northwood and West Ruislip are expected to have significant negative effects in relation to IIA assessment criterion 8.1. Three of the 10-year residential BLGs (East of Ickenham, Croydon-New Addington and Upminster) are within 250-1,000m of an internationally or nationally designated site, with impacts expected to be less direct due to the increased distance. It is therefore expected these will result in minor negative effects. The remaining 10-year residential BLGs are not within 1,000m of an internationally or national designated site and are therefore expected to have negligible effects against IIA assessment criterion 8.1, avoiding the direct or indirect physical loss of protected or other priority habitat and species. While the proximity of BLGs to designated sites provides an indication of the potential for an adverse effect, it is possible that appropriate mitigation may minimise adverse effects and may even result in beneficial effects, such as enhanced habitat connectivity if new developments include green infrastructure. The scope for improvements is dependent on the individual qualities of a development. Therefore, all effects are recorded as uncertain.

Criterion 8.2. Local biodiversity and geodiversity assets

F.28 All broad locations that contain or are near locally designated nature conservation sites, ancient woodland and priority habitats have the potential to affect the biodiversity of those sites and features. However, there may be opportunities to promote biodiversity or habitat connectivity if new developments incorporate green infrastructure. All of the 10-year residential BLGs overlap with at least one locally designated site, ancient woodland or priority habitat. The residential BLG site with the greatest overlap is Harold Park, with 55% of the BLG overlapping numerous priority habitats (primarily comprising deciduous woodland and traditional orchard). Eastern Hainault has the smallest overlap (5%) with locally designated sites, ancient woodlands and priority habitats of the 10-year residential BLGs. As development at all residential sites could result in direct or indirect adverse effects to protected or other priority habitat and species, or erode their functionality via severance or fragmentation, it is expected that all 10-year residential locations will have significant negative effects against IIA assessment criterion 8.2, with some uncertainty.

Criterion 8.3. Areas that could become important for biodiversity

F.29 Residential broad locations that contain areas that could become important for biodiversity (ACB) could help retain or enhance those areas and support nature recovery. All of the 10-year residential BLGs overlap an ACB. Due to the nature of residential development, it is anticipated that development at these sites has the potential to contribute to enhancing the overlapping ACBs and supporting their

recovery. Therefore, all 10-year residential BLGs are considered likely to have significant positive effects against IIA assessment criterion 8.3.

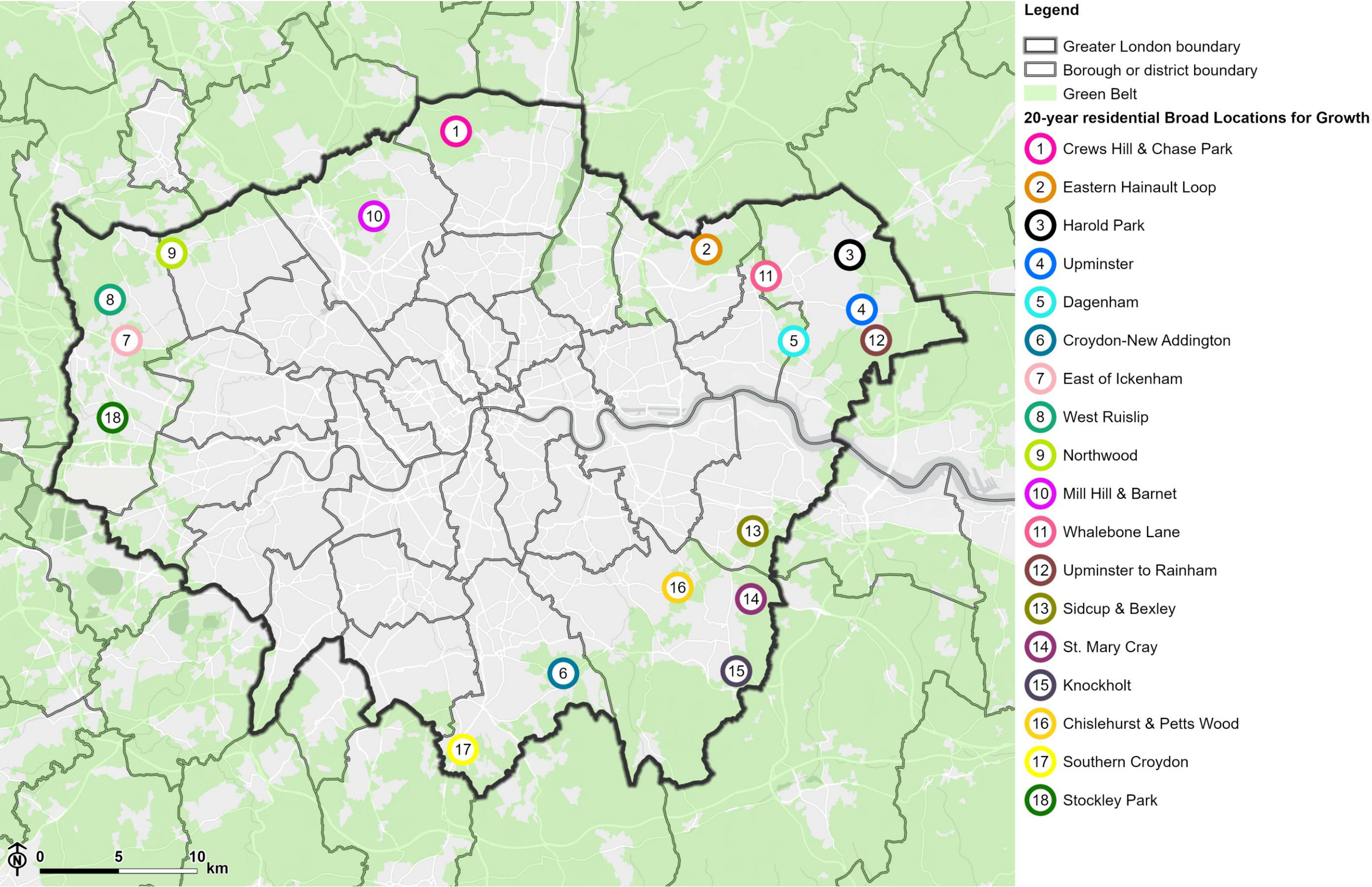
IIA objective 9: Historic environment

Criterion 9.1. Heritage assets and archaeological priority areas

F.30 The significance of a heritage asset can be harmed through its alteration or destruction, or development within its setting. In the absence of a historic environment sensitivity study, it is assumed that development in all residential BLGs could harm heritage assets. Notwithstanding this, development has the potential to enhance heritage assets. The effect is therefore expected to be uncertain in the case of all BLGs.

F.31 All 10-year residential BLGs contain heritage assets, overlapping a combination of archaeological priority areas, conservation areas and registered parks and gardens. Crews Hill & Chase Park, Harold Park and Upminster BLGs have a near or complete overlap with archaeological priority areas. Additionally, Crews Hill & Chase Park, East of Ickenham, Croydon-New Addington, Mill Hill & Barnet and West Ruislip BLGs contain listed buildings. Croydon-New Addington features a notable cluster of listed buildings, while East of Ickenham BLG overlaps with a Scheduled Monument. Out of all the 10-year residential BLGs, Eastern Hainault, Mill Hill & Barnet, Northwood and West Ruislip have the smallest overlaps with heritage assets. All 10-year residential BLGs are expected to have significant negative but uncertain effects against IIA assessment criterion 9.1, and it is recognised that in identifying the BLGs, the GLA assumed around 70% of the extent of the BLG would be developed, which should enable development to avoid heritage assets.

Figure F.2: 20-year residential Broad Locations for Growth



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Table F.2: IIA findings for the 20-year residential Broad Locations for Growth

IIA objective	IIA assessment criterion	Crews Hill & Chase Park	Chislehurst & Petts Wood	Dagenham	East of Ickenham	East of Hainault	Harold Park	Knockholt	Mill Hill & Barnet	Croydon-New Addington	Northwood	Sidcup & Bexley	Southern Croydon	St. Mary Cray	Stockley Park	Upminster	Upminster to Rainham	West Ruislip	Whalebone Lane
IIA objective 1: Best use of land and resources	1.1. Brownfield/greenfield land and the Agricultural Land Classification	--?	-	-	-	-	--?	--?	-	--?	-	-	-	--	-	--?	--	--?	--
IIA objective 1: Best use of land and resources	1.2. Minerals Safeguarding Area	0	0	-?	0	-?	-?	0	0	0	0	-?	0	0	0	-?	-?	0	-?
IIA objective 1: Best use of land and resources	1.3. Drinking water quality (Source Protection Zones)	0	-	--	-	0	0	-	0	--	--	--	--	-	-	0	-	--	0
IIA objective 1: Best use of land and resources	1.4. Surface water quality	--?	--?	--?	--?	--?	--?	--?	--?	0	--?	--?	0	--?	--?	--?	--?	--?	--?
IIA objective 2: Housing	2.1. Housing delivery	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++
IIA objective 3: Economic potential	3.1. New employment uses	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
IIA objective 3: Economic potential	3.2. Loss of existing employment uses	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
IIA objective 3: Economic potential	3.3. Proximity to employment uses	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++
IIA objective 4: Successful placemaking	4.1. Integration with existing neighbourhoods / settlements	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?

IIA objective	IIA assessment criterion	Crews Hill & Chase Park	Chislehurst & Petts Wood	Dagenham	East of Ickenham	East of Hainault	Harold Park	Knockholt	Mill Hill & Barnet	Croydon-New Addington	Northwood	Sidcup & Bexley	Southern Croydon	St. Mary Cray	Stockley Park	Upminster	Upminster to Rainham	West Ruislip	Whalebone Lane
IIA objective 4: Successful placemaking	4.2. Mix of uses	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++
IIA objective 4: Successful placemaking	4.3. Landscape	-?	--?	-?	-?	--?	-?	--?	-?	--?	--?	-?	-?	-?	-?	-?	-?	-?	--?
IIA objective 4: Successful placemaking	4.4. Open space	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++
IIA objective 5: Health and community safety	5.1. Noise pollution	0	--	0	--	0	0	0	0	0	0	0	0	0	0	0	0	0	0
IIA objective 5: Health and community safety	5.2. Air pollution	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
IIA objective 5: Health and community safety	5.3. Healthcare facilities	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?
IIA objective 6: Equality of opportunity	6.1. Deprivation	0	0	0	0	0	0	0	0	+	0	0	0	0	+	0	0	0	0
IIA objective 6: Equality of opportunity	6.2. Schools	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
IIA objective 7: Climate change	7.1. Climate change mitigation	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++
IIA objective 7: Climate change	7.2 Carbon storage	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
IIA objective 7: Climate change	7.3 Heat networks	++	-	-	-	++	-	-	-	-	+	-	-	-	++	-	-	-	+

IIA objective	IIA assessment criterion	Crews Hill & Chase Park	Chislehurst & Petts Wood	Dagenham	East of Ickenham	Easton Hainault	Harold Park	Knockholt	Mill Hill & Barnet	Croydon-New Addington	Northwood	Sidcup & Bexley	Southern Croydon	St. Mary Cray	Stockley Park	Upminster	Upminster to Rainham	West Ruislip	Whalebone Lane
IIA objective 7: Climate change	7.4. Climate change adaptation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
IIA objective 8: Biodiversity and geodiversity	8.1. International and national biodiversity and geodiversity assets	0?	--?	0?	-?	0?	0?	0?	0?	-?	--?	0?	--?	0?	0?	-?	--?	--?	0?
IIA objective 8: Biodiversity and geodiversity	8.2. Local biodiversity and geodiversity assets	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?
IIA objective 8: Biodiversity and geodiversity	8.3. Areas that could become important for biodiversity	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++
IIA objective 9: Historic environment	9.1. Heritage assets and archaeological priority areas	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?

Appraisal of the 20-year (candidate future/extended) residential Broad Locations for Growth

F.32 Due to the assessment criteria and assumptions used (as set out in **Appendix E**), the IIA effects of the 20-year candidate future/extended residential BLGs are the same for a number of the IIA objectives. Where differences arise between the BLGs, but also in relation to the smaller group of 10-year residential BLGs, this is due to the extended boundaries of some of the 10-year residential BLGs and/or the additional new 20-year residential BLGs containing, being within or in proximity to sensitive receptors or land uses (e.g. best and most versatile agricultural land, minerals safeguarding areas, water courses, protected vistas, or designated biodiversity or geodiversity sites) or sources of noise pollution. For this reason, there is potential for additional minor or significant negative effects to occur across a greater area in relation to the following IIA objectives:

- IIA objective 1: Best and use of land and resources
- IIA objective 4: Successful placemaking
- IIA objective 5: Health and community safety
- IIA objective 8: Biodiversity and geodiversity

F.33 Conversely, some of the 20-year residential BLGs (Stockley Park and Whalebone Lane) overlap or are within 100m of a low carbon heat network zone identified through the latest National Zoning Model (NRM0.5) where heat networks are likely to provide the lowest cost option for decarbonising heat. Large-scale residential or mixed-use development within residential broad locations may be able to connect to existing and/or create new low carbon heat networks. As such, they could offer opportunities to link development to efficient, resilient local zero-carbon heat sources, and therefore the 20-year residential BLGs have slightly more positive effects than the 10-year residential BLGs for IIA objective 7: Climate change.

F.34 Given there is much less certainty about the potential deliverability of the 20-year residential BLGs, there is less certainty about the IIA effects overall than for the 10-year residential BLGs.

IIA objective 1: Best use of land and resources

Criterion 1.1. Brownfield/greenfield land and the Agricultural Land Classification

F.35 The development of brownfield land represents a more efficient use of land in comparison to the development of greenfield land and presents an opportunity to reuse existing buildings or under-used buildings. However, none of the 20-year greenbelt residential BLGs are by definition, majority brownfield. In addition, Crews Hill & Chase Park, Harold Park, Knockholt, Croydon-New Addington, West Ruislip and Upminster largely comprise land classified as Grade 3 agricultural land (i.e. good to moderate quality agricultural land). Due to the loss of good to moderate quality agricultural land, these BLGs are expected to have significant negative but uncertain effects against IIA assessment criterion 1.1. The effects are recorded as uncertain due to the absence of data that distinguishes between Grades 3a (best and most versatile) and 3b (not best and most versatile) agricultural land. St. Mary Cray, Upminster to Rainham and Whalebone Lane candidate future 20-year residential BLGs largely comprise greenfield land classified as Grade 1 or 2 agricultural land, and as such are expected to have significant negative effects in relation to this criterion. The remaining 20-year residential BLGs comprise land not classified as Grades 1, 2 or 3 agricultural land. However, due to the fact they comprise greenfield land they are expected to have minor negative effects against IIA assessment criterion 1.1

Criterion 1.2. Minerals Safeguarding Area

F.36 Minerals Safeguarding Areas indicate where the Minerals Planning Authority will need to be consulted on an application and prior extraction of mineral resources will need to be undertaken before development commences. This is important to ensure that development does not result in the sterilisation of mineral resources. The Dagenham, Eastern Hainault, Harold Park, Sidcup & Bexley, Upminster, Upminster to Rainham and Whalebone Lane 20-year residential BLGs are each located, at least in part (63-96% overlap), within a Minerals Safeguarding Area. As such, they are expected to have minor negative but uncertain effects against IIA assessment criterion 1.2. The effects are recorded as uncertain, given that the outcome of consultation with the Minerals Planning Authority (including whether prior extraction would be required and the feasibility of such extraction) is not known at this stage. The remaining 20-year residential BLGs are expected to have negligible effects against IIA assessment criterion 1.2.

Criterion 1.3. Drinking water quality (Source Protection Zones)

F.37 The location of development may affect water quality during construction depending on its proximity to Source Protection Zones. At least 10% of the Dagenham, Croydon-New Addington, Northwood, Sidcup & Bexley, Southern Croydon and West Ruislip 20-year residential BLGs fall within Source Protection Zone 1 and therefore significant negative effects are expected against IIA assessment criterion 1.3. Sidcup & Bexley and Croydon-New Addington have the largest overlaps with SPZ 1 (46% and 40% respectively).

F.38 Six of the 20-year residential BLGs (Chislehurst & Petts Wood, East of Ickenham, Knockholt, St. Mary Cray, Stockley Park and Upminster to Rainham) do not coincide with SPZ 1 but do fall partially within Source Protection Zones 2 and 3 and, as such, are expected to have minor negative effects against IIA assessment criterion 1.3. The remaining 20-year residential BLGs have less than a 10% overlap with Source Protection Zones and as such are expected to have negligible effects.

Criterion 1.4. Surface water quality

F.39 The proximity of BLGs to watercourses and waterbodies can influence their effect on water quality. The extent of the impact is also dependent on the use of Sustainable Drainage Systems (SuDS) and construction techniques, to be secured through the planning application process. Therefore, all adverse effects are uncertain. All of the 20-year residential BLGs, with the exception of Croydon-New Addington and Southern Croydon, contain a watercourse or waterbody. As such, development at these locations could impact surface water quality. Therefore, all of the 20-year residential BLGs, with the exception of Croydon-New Addington and Southern Croydon, are expected to have significant negative but uncertain effects against IIA assessment criterion 1.4. Croydon-New Addington and Southern Croydon are expected to have negligible effects.

IIA objective 2: Housing

Criterion 2.1. Housing delivery

F.40 All residential BLGs could be expected to deliver at least 3,000 new homes and together, the 10 and 20-year BLGs would potentially more than double housing capacity delivered in the Green Belt BLGs, all of which will include a mix of tenures and an affordable housing contribution. As the BLGs exclude any areas of existing

housing, their development will not result in any loss of housing. All 20-year BLGs are expected to have significant positive effects against IIA assessment criterion 2.1.

IIA objective 3: Economic potential

Criterion 3.1. New employment uses

F.41 While the 20-year residential Broad Locations for Growth will not deliver new industrial land, it is expected that around one third of each broad location will be available for uses other than residential, such as retail units or office space. Therefore, minor positive effects are expected for all 20-year residential locations in relation to IIA assessment criterion 3.1.

Criterion 3.2. Loss of existing employment uses

F.42 Dagenham, Eastern Hainault, Harold Park and Stockley Park contain very small areas of land designated as a Locally Significant Industrial Site (LSIS) or Strategic Industrial Land (SIL). As the overlap is minimal and the GLA's methodology for identifying the BLGs excluded any built-up area from the development capacity, allocating residential development at these locations is not considered likely to limit opportunities for new employment uses. As such, all 20-year residential BLGs are expected to have negligible effects against IIA assessment criterion 3.2.

Criterion 3.3. Proximity to employment uses

F.43 The location of BLGs will influence how easily residents can access employment opportunities. All BLGs are within walking distance of public transport networks that provide strong connections to Central London and other key employment areas. This level of accessibility supports efficient travel to a wide range of job opportunities. As such, all 20-year residential BLGs are expected to have significant positive effects against IIA assessment criterion 3.3.

IIA objective 4: Successful placemaking

Criterion 4.1. Integration with existing neighbourhoods/ settlements

F.44 Appropriate design of new development at residential BLGs could help to integrate them with existing neighbourhoods/settlements. However, the successful

integration of new development within existing neighbourhoods or settlements will depend on the detailed design of the residential scheme, rather than solely on its spatial location, which remains uncertain at this stage. As such, all 20-year residential BLGs are expected to have uncertain effects against IIA assessment criterion 4.1.

Criterion 4.2. Mix of uses

F.45 It is expected that around one third of the land within each residential BLG will be available for a mix of uses and facilities, helping to create new communities with access to employment, services and facilities. Therefore, all 20-year residential BLGs are expected to have significant positive effects against IIA assessment criterion 4.2.

Criterion 4.3. Landscape

F.46 Due to the scale of future development, it is likely that development at all BLGs would have adverse effects on the character and sensitivity of the landscape, particularly if they fall within important views. Conversely, development could enhance the landscape and residential character if it introduces high-quality design and green infrastructure. In the absence of landscape sensitivity studies for all BLGs, or detail of specific development proposals, the likely effects against IIA assessment criterion 4.3. are subject to a high degree of uncertainty.

F.47 Six of the 20-year residential broad locations coincide with protected views. Eastern Hainault BLG overlaps both the Westminster Pier to St Paul's Cathedral and the King Henry's Mound to St Paul's Cathedral protected vistas, while Whalebone BLG also overlaps the latter. Croydon-New Addington BLG coincides with three protected vistas: Alexandra Palace viewing terrace to St Paul's Cathedral, Parliament Hill summit to the Palace of Westminster, and Parliament Hill oak tree to Palace of Westminster. Northwood BLG falls within the Greenwich Park Wolfe statue to Tower Bridge protected vista. Both Chislehurst & Petts Wood and Knockholt candidate future BLGs overlap with the Parliament Hill summit to St Paul's Cathedral protected vista. Due to the potential for development to have a direct impact on protected views, these six BLGs are expected to have significant negative but uncertain effects against IIA assessment criterion 4.3.

F.48 The remaining residential BLGs do not coincide with any protected vistas but due to the scale of development, are expected to have a minor negative but uncertain effects against IIA assessment criterion 4.3.

Criterion 4.4. Open space

F.49 Proximity to existing open spaces and provision of new ones can encourage participation in active outdoor recreation, improving public health and helping to create high quality new developments and successful places. All 20-year residential BLGs are assumed to provide sufficient accessible green space to meet the national standards of 3ha/1,000 people. Therefore, likely significant positive effects are expected for all 20-year residential BLGs against IIA assessment criterion 4.4

IIA objective 5: Health and community safety

Criterion 5.1. Noise pollution

F.50 More than 25% of Chislehurst & Petts Wood 20-year residential BLG is expected to experience daytime road and rail noise pollution of 60.0dB or more, while 25% of the BLG is also expected to experience night-time road and rail noise pollution of 55.0dB or more. Additionally, over 25% East of Ickenham BLG is expected to experience daytime road and rail noise pollution of 60.0dB or more, with over 25% also expected to experience night-time road and rail noise pollution of 55.0dB or more. This would likely cause some disruption to new residents, with potential adverse effects on their health and wellbeing. As such, these two BLGs are expected to have significant negative effects against IIA assessment criterion 5.1. None of the 20-year residential BLGs are expected to experience noise pollution associated with aircrafts. The remaining 20-year residential BLGs are expected to have negligible effects against IIA assessment criterion 5.1.

Criterion 5.2. Air pollution

F.51 None of the 20-year residential BLGs overlap an Air Quality Focus Area by over 10%. As such, all 20-year residential BLGs are expected to have negligible effects against IIA assessment criterion 5.2. However, it is recognised that several London boroughs are designated as Air Quality Management Areas (AQMAs) and that air pollution remains a wider issue across London.

Criterion 5.3. Healthcare facilities

F.52 Residential BLGs near existing healthcare facilities will support good access to healthcare services for residents. However, there is no consistent dataset available to determine the proximity of the BLGs to existing healthcare facilities. The available capacity of existing healthcare facilities such as GP surgeries is also not known.

Notwithstanding this, the scale of the 20-year residential BLGs is expected to accommodate the provision of new healthcare facilities to meet the increased demand. All 20-year residential BLGs are expected to have uncertain effects against IIA assessment criterion 5.3.

IIA objective 6: Equality of opportunity

Criterion 6.1. Deprivation

F.53 Over 10% of the Croydon-New Addington and Stockley Park 20-year residential BLGs overlap one of the 20% most deprived areas nationally. Directing new development to more deprived areas has the potential to support economic growth and regeneration. As such, these BLGs are expected to have minor positive effects against IIA assessment criterion 6.1. The remaining 20-year residential BLGs are expected to have negligible effects against IIA assessment criterion 6.1.

Criterion 6.2. Schools

F.54 Due to the scale of the 20-year residential broad locations and their delivery of at least 3,000 new homes each, it is expected that they will support the provision of additional school capacity, benefitting new and existing communities who live within the vicinity of each BLG. All 20-year residential BLGs are therefore expected to have minor positive effects against IIA assessment criterion 6.2.

IIA objective 7: Climate change

Criterion 7.1. Climate change mitigation

F.55 All BLGs are within walking distance of public transport networks. This high level of accessibility encourages the use of sustainable transport modes and reduces reliance on private car travel, contributing to lower emissions. As such, all 20-year BLGs are expected to have significant positive effects against IIA assessment criterion 7.1.

Criterion 7.2. Carbon storage

F.56 Habitats such as woodlands, grasslands, wetlands and the saline and estuarine habitats of the Thames play direct roles in carbon sequestration and long-term

carbon storage, supporting reductions in London's CO₂ emissions. Protecting and expanding these habitats and providing appropriate management are key aims within the London Environment Strategy. Where BLGs contain or are adjacent to areas of relevant habitats, there could be opportunities to retain, extend or enhance those habitats. However, the extent to which BLGs will include opportunities to do this, or create new habitats is unknown at this stage, as that will depend on the design, layout and proposals for retention and enhancement, or creation of habitats which come forward at planning application stage. All 20-year residential BLGs are therefore expected to have minor positive but uncertain effects against IIA assessment criterion 7.2.

Criterion 7.3. Heat networks

F.57 Large-scale residential or mixed-use development within residential broad locations may be able to connect to existing and/or create new low carbon heat networks if they are in areas identified through the latest National Zoning Model (NRM0.5) where heat networks are likely to provide the lowest cost option for decarbonising heat. As such, some of the 20-year residential BLGs could offer opportunities to link development to efficient, resilient local zero-carbon heat sources. Crews Hill & Chase Park, Eastern Hainault and Stockley Park overlap with existing low carbon heat network zone, which may have opportunities for development to connect to an existing or future heat network. A significant positive effect is therefore expected for these three 20-year residential BLGs against IIA assessment criterion 7.3. Northwood and Whalebone Lane BLGs are each situated within 100m of a heat network zone and therefore are likely to have minor positive effects. The remaining 20-year residential BLGs are all over 100m from a heat network zone, so are less well-located to areas where existing or future heat networks are likely to provide the lowest cost option for decarbonising heat. Minor negative effects are therefore expected for these BLGs against IIA assessment criterion 7.3.

Criterion 7.4. Climate change adaptation

F.58 Climate change is expected to increase the frequency and severity of flooding events. The extent to which this risk can be managed is influenced by the location of residential BLGs in relation to watercourses and areas susceptible to flooding. All 20-year residential BLGs have less than a 30% overlap with an area at medium or high risk of fluvial or surface water flooding, indicating limited exposure to flood risk and sufficient scope for mitigation measures to be implemented. Therefore, negligible effects are expected for all 20-year residential BLGs against IIA assessment criterion 7.4.

IIA objective 8: Biodiversity and geodiversity

Criterion 8.1. International and national biodiversity and geodiversity assets

F.59 Broad locations in close proximity to internationally or nationally designated sites have the potential to affect the biodiversity or geodiversity of those sites. While Northwood overlaps with a designated site (Ruislip Woods SSSI), Chislehurst & Petts Wood, Southern Croydon, Upminster to Rainham and West Ruislip 20-year BLGs are all within 250m of a designated site and therefore also have the potential to cause direct or indirect physical harm to these protected areas. As such, these five BLGs are expected to have significant negative effects in relation to IIA assessment criterion 8.1.

F.60 Three of the 20-year residential BLGs (East of Ickenham, Croydon-New Addington and Upminster) are within 250-1,000m of an internationally or nationally designated site, with impacts expected to be less direct due to the increased distance. It is therefore expected these will result in minor negative effects. The remaining 20-year residential BLGs are not within 1,000m of an internationally or national designated site and are therefore expected to have negligible effects against IIA assessment criterion 8.1, avoiding the direct or indirect physical loss of protected or other priority habitat and species.

F.61 While the proximity of BLGs to designated sites provides an indication of the potential for an adverse effect, it is possible that appropriate mitigation may minimise adverse effects and may even result in beneficial effects, such as enhanced habitat connectivity if new developments include green infrastructure. The scope for improvements is dependent on the individual qualities of a development. Therefore, all effects are recorded as uncertain.

Criterion 8.2. Local biodiversity and geodiversity assets

F.62 All broad locations that contain or are near locally designated nature conservation sites, ancient woodland and priority habitats have the potential to affect the biodiversity of those sites and features. However, there may be opportunities to promote biodiversity and new habitat connectivity if new developments incorporate green infrastructure. All of the 20-year residential BLGs overlap with at least one locally designated site, ancient woodland or priority habitat.

F.63 The 20-year BLG site with the greatest overlap, Chislehurst & Petts Wood, has a 67% overlap with numerous priority habitats (primarily comprising deciduous

woodland). Whalebone Lane has the smallest overlap (6%) with locally designated sites, ancient woodlands and priority habitats of the 20-year residential BLGs. As development at all residential sites could result in direct or indirect adverse effects to protected or other priority habitat and species, or erode their functionality via severance or fragmentation, it is expected that all 20-year residential locations will have significant negative effects against IIA assessment criterion 8.2, with some uncertainty.

Criterion 8.3. Areas that could become important for biodiversity

F.64 Residential broad locations that contain areas that could become important for biodiversity (ACB) could help retain or enhance those areas and support nature recovery. All of the 20-year residential BLGs overlap an ACB. Due to the nature of residential development, it is anticipated that development at these sites has the potential to contribute to enhancing the overlapping ACBs and supporting their recovery. Therefore, all 20-year residential BLG are considered likely to have significant positive effects against IIA assessment criterion 8.3.

IIA objective 9: Historic environment

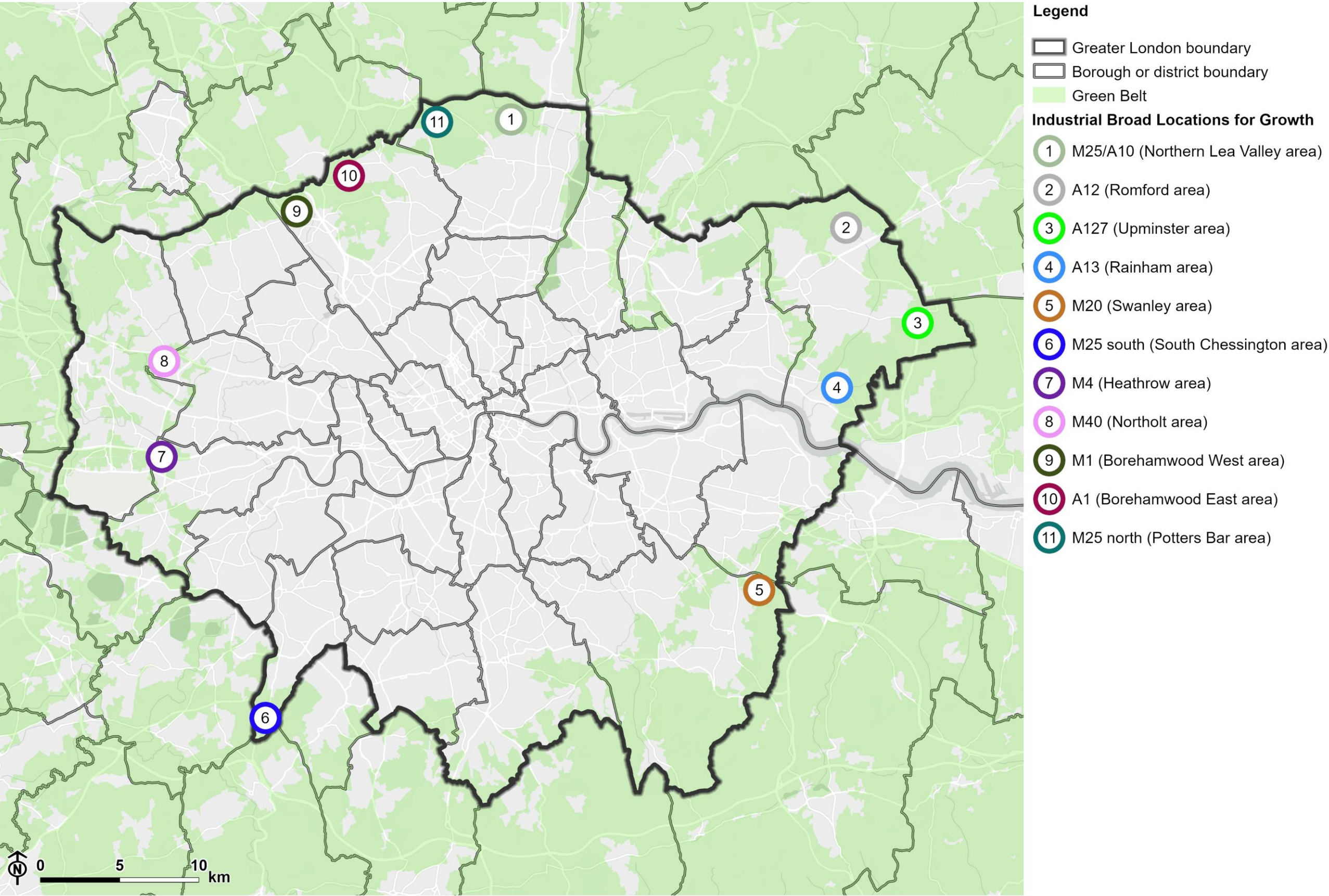
Criterion 9.1. Heritage assets and archaeological priority areas

F.65 The significance of a heritage asset can be harmed through its alteration or destruction, or development within its setting. In the absence of a historic environment sensitivity study, it is assumed that development in all residential BLGs could harm heritage assets. Notwithstanding this, development has the potential to enhance heritage assets. The effect is therefore expected to be uncertain in the case of all BLGs.

F.66 All 20-year residential BLGs contain heritage assets, overlapping a combination of archaeological priority areas, conservation areas and registered parks and gardens. Many of the BLGs have a significant overlap with archaeological priority areas, including South Croydon, Croydon-New Addington, St. Mary Cray, Chislehurst & Petts Wood, Upminster to Rainham, Upminster, Harold Park, Whalebone Lane, and Crews Hill & Chase Park. Several of the BLGs also intersect conservation areas, most notably Crews Hill & Chase Park and Upminster to Rainham. Additionally, Southern Croydon, Northwood, West Ruislip and East of Ickenham BLGs have some minimal overlap with scheduled monuments. The majority of the 20-year residential BLGs contain listed buildings. All 20-year residential BLGs are expected to have significant negative but uncertain effects against IIA assessment criterion 9.1, and it

is recognised that the in identifying the BLGs, the GLA assumed around 70% of the extent of the BLG would be developed, which should enable development to avoid heritage assets.

Figure F.3: Industrial Broad Locations for Growth



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Table F.3: IIA findings for the industrial Broad Locations for Growth

IIA objective	IIA assessment criterion	A12 (Romford area)	A127 (Upminster area)	A13 (Rainham area)	A1 (Boreham wood East area)	M1 (Boreham wood West area)	M25 South (South Chessington area)	M20 (Swanley area)	M4 Cluster	M40 (Northolt area)	M25/A10 (Northern Lea Valley area)	M25 north (Potters Bar area)
IIA objective 1: Best use of land and resources	1.1. Brownfield/ greenfield land and the Agricultural Land Classification	--?	--?	-	--?	--?	--?	--	-	-	--?	--?
IIA objective 1: Best use of land and resources	1.2. Minerals Safeguarding Area	0	-?	-?	0	0	0	-?	0	0	0	0
IIA objective 1: Best use of land and resources	1.3. Drinking water quality (Source Protection Zones)	0	-	-	--	0	0	-	0	0	-	0
IIA objective 1: Best use of land and resources	1.4. Surface water quality	--?	--?	--?	--?	--?	0	--?	--?	--?	--?	--?
IIA objective 2: Housing	2.1. Housing delivery	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA objective 3: Economic potential	3.1. New employment uses	++	++	++	++	++	++	++	++	++	++	++
IIA objective 3: Economic potential	3.2. Retention of existing employment uses	0	0	0	0	0	0	0	0	0	0	0
IIA objective 3: Economic potential	3.3. Proximity to employment uses	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA objective 4: Successful placemaking	4.1. Integration with existing neighbourhoods/ settlements	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA objective 4: Successful placemaking	4.2. Mix of uses	+	+	+	+	+	+	+	+	+	+	+
IIA objective 4: Successful placemaking	4.3. Landscape	--?	-?	-?	-?	-?	-?	--?	-?	-?	-?	-?
IIA objective 5: Health and community safety	5.1. Noise pollution	0	-	0	0	0	0	0	--	-	--	--
IIA objective 5: Health and community safety	5.2. Air pollution	0	0	0	0	0	0	0	--	0	0	0

IIA objective	IIA assessment criterion	A12 (Romford area)	A127 (Upminster area)	A13 (Rainham area)	A1 (Boreham wood East area)	M1 (Boreham wood West area)	M25 South (South Chessington area)	M20 (Swanley area)	M4 Cluster	M40 (Northolt area)	M25/A10 (Northern Lea Valley area)	M25 north (Potters Bar area)
IIA objective 5: Health and community safety	5.3. Healthcare facilities	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA objective 6: Equality of opportunity	6.1. Deprivation	0	0	0	0	0	0	+	+	+	0	0
IIA objective 6: Equality of opportunity	6.2. Schools	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA objective 7: Climate change	7.1. Climate change mitigation	--	--	--	--	--	--	--	--	--	--	--
IIA objective 7: Climate change	7.2 Carbon storage	+?	+?	+?	+?	+?	+?	+?	+?	+?	+?	+?
IIA objective 7: Climate change	7.3 Heat networks	-	-	-	++	+	-	-	++	-	-	-
IIA objective 7: Climate change	7.4. Climate change adaptation	0	0	0	0	0	0	0	0	0	0	0
IIA objective 8: Biodiversity and geodiversity	8.1. International and national biodiversity and geodiversity assets	0?	0?	--?	0?	0?	--?	-?	0?	0?	0?	0?
IIA objective 8: Biodiversity and geodiversity	8.2. Local biodiversity and geodiversity assets	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?
IIA objective 8: Biodiversity and geodiversity	8.3. Areas that could become important for biodiversity	--	--	--	--	--	--	--	--	--	--	--
IIA objective 9: Historic environment	9.1. Heritage assets and archaeological priority areas	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?

Appraisal of the industrial Green Belt Broad Locations for Growth

IIA objective 1: Best use of land and resources

Criterion 1.1. Brownfield/greenfield land and the Agricultural Land Classification

F.67 The development of brownfield land represents a more efficient use of land in comparison to the development of greenfield land and presents an opportunity to reuse existing buildings or under-used buildings. However, by definition none of the industrial green belt BLGs are majority brownfield. Instead, they comprise greenfield land. The M20 (Swanley area) largely comprises Grades 1 (i.e. excellent) or 2 (i.e. very good) agricultural land and due to the loss of excellent to very good agricultural land, is expected to have a significant negative effect against IIA assessment criterion 1.1. The A12 (Romford area), A127 (Upminster area), A1 (Borehamwood East area), M1 (Borehamwood West area), M25 South (South Chessington area), M25/A10 (Northern Lea Valley area), and M25 north (Potters Bar area) comprise land classified as Grade 3 agricultural land (i.e. good to moderate quality agricultural land). As such, these BLGs are expected to have significant negative but uncertain effects in relation to assessment criterion 1.1. The effects are recorded as uncertain due to the absence of data that distinguishes between Grades 3a (best and most versatile) and Grade 3b (not best and most versatile) agricultural land. The remaining industrial BLGs comprise less than 50% of Grades 1, 2 or 3 agricultural land. However, due to the fact they comprise greenfield land are expected to have minor negative effects against assessment criterion 1.1.

Criterion 1.2. Minerals Safeguarding Area

F.68 Minerals Safeguarding Areas indicate where the Minerals Planning Authority will need to be consulted on an application and prior extraction of mineral resources will need to be undertaken before development commences. This is important to ensure that development does not result in the sterilisation of mineral resources. The A127 (Upminster area), A13 (Rainham area), and M20 (Swanley area) are located, at least in part, within a Minerals Safeguarding Area. As such, they are expected to have minor negative effects against IIA assessment criterion 1.2. The effects are recorded as uncertain, given that the outcome of consultation with the Minerals Planning Authority (including whether prior extraction would be required and the feasibility of

such extraction) is not known at this stage. The remaining industrial BLGs are expected to have negligible effects against IIA assessment criterion 1.2.

Criterion 1.3. Drinking water quality (Source Protection Zones)

F.69 The location of development may affect water quality during construction depending on its proximity to Source Protection Zones. A1 (Borehamwood East area) industrial BLG is located within Source Protection Zone 1 and therefore is expected to have a significant negative effect against IIA assessment criterion 1.3. The A127 (Upminster area), A13 (Rainham area), M20 (Swanley area) and M25/A10 (Northern Lea Valley area) are located, at least in part, within Source Protection Zones 2 and 3, and are therefore expected to have minor negative effects against IIA assessment criterion 1.3. The remaining industrial BLGs are expected to have negligible effects against IIA assessment criterion 1.3.

Criterion 1.4. Surface water quality

F.70 The proximity of BLGs to watercourses and waterbodies can influence their effect on water quality. The extent of the impact is also dependent on the use of Sustainable Drainage Systems (SuDS) and construction techniques, to be secured through the planning application process. Therefore, all adverse effects are uncertain. All of the industrial BLGs, with the exception of M25 South (South Chessington area), contain or are located within 100m of a watercourse or waterbody. As such, development at these locations could impact surface water quality. Therefore, all of the industrial BLGs, with the exception of M25 South (South Chessington area), are expected to have significant negative but uncertain effects against IIA assessment criterion 1.4. M25 South (South Chessington area) is expected to have a negligible effect, as it is located over 100m from the nearest watercourse or waterbody.

IIA objective 2: Housing

Criterion 2.1. Housing delivery

F.71 None of the industrial BLGs will contribute towards housing delivery. As such, assessment criterion 2.1. has been scoped out of the appraisal of industrial BLGs.

IIA objective 3: Economic potential

Criterion 3.1. New employment uses

F.72 All broad industrial locations will deliver new industrial/logistics land, providing the opportunity for businesses to better meet their needs and improve efficiency, as well as providing new opportunities for employment-generating activity. As such, all of the industrial BLGs are expected to have significant positive effects against IIA assessment criterion 3.1.

Criterion 3.2. Retention of existing employment uses

F.73 M4 Cluster contains land designated as a Locally Significant Industrial Site (LSIS). However, as the overlap is minimal, this BLG would not play a significant role in supporting the safeguarding of land for its intended function. As such, all industrial BLGs are expected to have negligible effects against IIA assessment criterion 3.2.

Criterion 3.3. Proximity to employment uses

F.74 The proximity of the industrial BLGs to employment areas is not relevant as they will instead provide new job opportunities, and so criterion 3.3. has been scoped out of the appraisal of industrial BLGs.

IIA objective 4: Successful placemaking

Criterion 4.1. Integration with existing neighbourhoods/ settlements

F.75 None of the industrial BLGs will affect integration with existing neighbourhoods/settlements and therefore criterion 4.1. has been scoped out of the appraisal of industrial BLGs.

Criterion 4.2. Mix of uses

F.76 Industrial BLGs are likely to include infrastructure development to support growth and may therefore help to ensure that utilities and digital infrastructure can support and enable the scale of London's future development. Therefore, all industrial BLGs are expected to have minor positive effects against IIA assessment criterion 4.2.

Criterion 4.3. Landscape

F.77 Due to the scale of future development, it is likely that development at all BLGs would have adverse effects on the character and sensitivity of the landscape, particularly if they fall within important views. Conversely, development could enhance the landscape if it introduces high-quality design and green infrastructure. In the absence of landscape sensitivity studies for all BLGs, or detail of specific development proposals, the likely effects against IIA assessment criterion 4.3 are subject to a high degree of uncertainty.

F.78 The A12 (Romford area) BLG falls within the King Henry's Mound to St Paul's Cathedral protected vista, while the M20 (Swanley area) BLG coincides with the Primrose Hill summit to St Paul's Cathedral protected vista. Due to the potential for direct impacts on protected views, it is expected that these BLGs will likely have significant negative but uncertain effects against IIA assessment criterion 4.3. The remaining industrial BLGs do not coincide with any protected vistas and are therefore expected to have minor negative but uncertain effects due to the scale of development proposed at each location.

IIA objective 5: Health and community safety

Criterion 5.1. Noise pollution

F.79 More than 25% of M25/A10 (Northern Lea Valley area) and M25 north (Potters Bar area) are expected to experience daytime road and rail noise pollution of 60.0dB or more. Additionally, more than 25% of the M4 Cluster is within the 55dB aircraft noise contour associated with Heathrow Airport. These sources of noise pollution would likely cause disruption to workers, with potential adverse effects on their health and wellbeing. As such, these BLGs are expected to have significant negative effects against IIA assessment criterion 5.1. More than 25% of the M40 (Northolt area) and the A127 (Upminster area) are expected to experience daytime road and rail noise pollution of 55-59.9dB and so could cause some disruption in terms of noise. As such, minor negative effects are expected for both the M40 (Northolt area) and A127 (Upminster area) against IIA assessment criterion 5.1. The remaining industrial BLGs are expected to have negligible effects against IIA assessment criterion 5.1.

Criterion 5.2. Air pollution

F.80 More than 10% of the M4 Cluster overlaps with an Air Quality Focus Area and industrial activity in this area is expected to contribute towards air pollution.

Therefore, M4 Cluster is expected to have a significant negative effect in relation to IIA assessment criterion 5.2. The remaining industrial BLGs are expected to have negligible effects against criterion 5.2.

Criterion 5.3. Healthcare facilities

F.81 The access industrial BLGs have to healthcare facilities is not relevant, although it is acknowledged that workers can utilise pharmacies before and after work and during lunch breaks. Therefore, criterion 5.3. has been scoped out of the appraisal of industrial BLGs.

IIA objective 6: Equality of opportunity

Criterion 6.1. Deprivation

F.82 At least 10% of the M20 (Swanley area), M4 Cluster, and M40 (Northolt area) industrial BLGs are within one of the 20% most deprived areas nationally. Directing new development to more deprived areas has the potential to support economic growth and regeneration. As such, these BLGs are expected to have minor positive effects against IIA assessment criterion 6.1. The remaining industrial BLGs are expected to have negligible effects.

Criterion 6.2. Schools

F.83 None of the industrial BLGs will contribute towards additional school capacity and therefore criterion 6.2. has been scoped out of the appraisal of industrial BLGs.

IIA objective 7: Climate change

Criterion 7.1. Climate change mitigation

F.84 The Public Transport Accessibility Level (PTAL) is a measure used to assess the accessibility of a location to London's public transport network. It assigns a rating from 1 to 6 (with sub-categories 1a, 1b, 6a and 6b), where 1a represents very poor accessibility by public transport and 6b represents excellent accessibility. All industrial BLGs have PTAL ratings of 0, 1a or 1b, meaning they have the lowest public transport access in London. As such, all industrial BLGs are expected to have significant negative effects against assessment criterion 7.1.

Criterion 7.2. Carbon storage

F.85 Habitats such as woodlands, grasslands, wetlands and the saline and estuarine habitats of the Thames play direct roles in carbon sequestration and long-term carbon storage, supporting reductions in London's CO₂ emissions. Protecting and expanding these habitats and providing appropriate management are key aims within the London Environment Strategy. Where BLGs contain or are adjacent to areas of relevant habitats, there could be opportunities to retain, extend or enhance those habitats. However, the extent to which BLGs will include opportunities to do this, or create new habitats is unknown at this stage, as that will depend on the design, layout and proposals for retention and enhancement, or creation of habitats which come forward at the planning application stage. All industrial BLGs are therefore expected to have minor positive but uncertain effects against IIA assessment criterion 7.2.

Criterion 7.3 Heat networks

F.86 Large-scale industrial or logistics development within industrial broad locations may be able to connect to existing and/or create new low-carbon heat networks if they are in areas identified through the latest National Zoning Model (NRM0.5) where heat networks are likely to provide the lowest cost option for decarbonising heat. Industrial BLGs may also have potential to produce waste heat and supply heat to other developments. Borehamwood East and the M4 Cluster overlap with low carbon heat network zones, presenting opportunities for development to connect to an existing or future heat network. These BLGs are therefore expected to have significant positive effects against IIA assessment criterion 7.3. Borehamwood West is situated within 100m of a low carbon heat network zone, and therefore a minor positive effect is likely as there is potential for this location to also connect to an existing or future low carbon heat network. The remaining industrial BLGs are all over 100m from a network, offering limited opportunities for development to utilise connections to existing heat networks. Therefore, they are expected to have minor negative effects against IIA assessment criterion 7.3.

Criterion 7.4. Climate change adaptation

F.87 Climate change is expected to increase the frequency and severity of flooding events. The extent to which this risk can be managed is influenced by the location of industrial BLGs in relation to watercourses and areas susceptible to flooding. All industrial BLGs have less than a 30% overlap with an area at risk of fluvial or surface water flooding, indicating limited exposure to flood risk and sufficient scope for

mitigation measures to be implemented. Therefore, negligible effects are expected for all industrial BLGs against IIA assessment criterion 7.4.

IIA objective 8: Biodiversity and geodiversity

Criterion 8.1. International and national biodiversity and geodiversity assets

F.88 Broad locations in close proximity to internationally or nationally designated sites have the potential to affect the biodiversity or geodiversity of those sites. The A13 (Rainham area) and M25 South (South Chessington area) are within 250m of a nationally designated site (Inner Thames Marshes SSSI and Epsom and Ashted Commons SSSI, respectively), and so are expected to have significant negative effects against IIA assessment criterion 8.1. The M20 (Swanley area) is within 250-1,000m of an internationally or nationally designated site (Ruxley Gravel Pits SSSI), and so is expected to have a minor negative effect, which may be more indirect. The remaining industrial BLGs are further than 1,000m from a site and so are expected to have negligible effects against IIA assessment criterion 8.1.

F.89 While the proximity of BLGs to designated sites provides an indication of the potential for an adverse effect, it is possible that appropriate mitigation may minimise adverse effects and may even result in beneficial effects, such as enhanced habitat connectivity if new developments include green infrastructure. The scope for improvements is dependent on the individual qualities of a development. Therefore, all effects are recorded as uncertain.

Criterion 8.2. Local biodiversity and geodiversity assets

F.90 All broad locations that contain or are near locally designated nature conservation sites, ancient woodland and priority habitats have the potential to affect the biodiversity of those sites and features. However, there may be opportunities to promote biodiversity if new developments incorporate green infrastructure. All of the industrial BLGs overlap at least one locally designated site, ancient woodland or priority habitat. The industrial site with the greatest overlap with locally designated sites, ancient woodland and priority habitats is Borehamwood East with 40% of the BLG overlapping SINC, Rowley Green Common Local Nature Reserve, and some priority habitats (good quality semi-improved grassland and deciduous woodland). This is followed by the M40 (Northolt area) with 26% of the BLG overlapping SINC, Yeading Woods Local Nature Reserve and some priority habitats (deciduous woodland). M25 north (Potters Bar area) has the smallest overlap (1%) of the

industrial BLGs with locally designated sites, with only priority habitat (deciduous woodland). As development at all industrial sites could result in direct or indirect physical harm to protected or other priority habitats and species, or erode their functionality via severance or fragmentation, it is expected that all industrial locations will likely have significant negative effects against IIA assessment criterion 8.2. with some uncertainty.

Criterion 8.3. Areas that could become important for biodiversity

F.91 Industrial broad locations that contain areas that could become important for biodiversity (ACB) are unlikely to be capable of supporting nature recovery and may risk direct or indirect physical harm to protected or other priority habitat and species, or the erosion of their functionality. All the industrial BLGs overlap with an ACB. As such, all industrial BLGs are expected to have significant negative effects against IIA assessment criterion 8.3.

IIA objective 9: Historic environment

Criterion 9.1. Heritage assets and archaeological priority areas

F.92 The significance of a heritage asset can be harmed through its alteration or destruction, or development within its setting. In the absence of a historic environment sensitivity study, it is assumed that development in all industrial BLGs could harm heritage assets. Notwithstanding this, development also has the potential to enhance heritage assets. The effect is therefore expected to be uncertain in the case of all BLGs.

F.93 All industrial BLGs contain heritage assets, particularly archaeological priority areas. The A12 (Romford area), A127 (Upminster area), A13 (Rainham area), Borehamwood West, M20 (Swanley area), M25/A10 (Northern Lea Valley area), and M25 north (Potters Bar area) all fall within an archaeological priority area. All industrial BLGs, with the exception of Borehamwood East, M4 Cluster, M40 (Northolt area), and M25 South (South Chessington area) contain listed buildings. The M40 GB Industrial broad location minimally intersects a scheduled monument. Borehamwood East has comparatively limited interaction with heritage assets, with only a small overlap with an archaeological priority area and no other assets. All industrial BLGs are expected to have significant negative but uncertain effects against IIA assessment criterion 9.1.

References

- 1 The Conservation of Habitats and Species Regulations 2017 (2017) (SI No. 2017/1012), as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (2019) (SI 2019/579)
- 2 [Ministry of Housing, Communities and Local Government \(2016, updated 2024\) Planning Practice Guidance](#)
- 3 [Levelling-up and Regeneration Act 2023](#)
- 4 [Planning and Infrastructure Act 2025](#)
- 5 [Woodland Trust – Nature Emergency UK](#)
- 6 [Department for Environment, Food and Rural Affairs \(2026\) Nature security assessment on global biodiversity loss, ecosystem collapse and national security](#)
- 7 [Ministry of Housing, Communities and Local Government \(2025, updated 2026\) National Planning Policy Framework: proposed reforms and other changes to the planning system](#)
- 8 [Ministry of Housing, Communities and Local Government \(2016, updated 2024\) Planning Practice Guidance](#)
- 9 [Mayor of London – Monitoring the London Plan](#)
- 10 [GLA – State of London Report](#)
- 11 [The London Datastore](#)
- 12 [GLA \(2019\) Equality Diversity and Inclusion Evidence Base for London](#)
- 13 [GLA – London’s Social Evidence Base](#)
- 14 [GLA – Economic Fairness Evidence Base](#)
- 15 [GLA \(2024\) Snapshot of Health Inequalities in London](#)
- 16 [Latin Elephant \(2021\) Supporting migrant and ethnic economies through regeneration in London](#)
- 17 [GLA \(2024\) Climate Risk Mapping](#)
- 18 ONS – Census 2021
- 19 ONS – Census 2021
- 20 [Trust for London \(2023\) Census 2021 deep dive: disability and deprivation in London](#)

-
- 21 [Independent \(2016\) Number of British people seeking to change their gender soars](#)
 - 22 [University College London \(2023\) Increase in the number of people identifying as transgender in the UK](#)
 - 23 [Trust for London \(2023\) Census 2021 deep dive: gender identity and deprivation in London](#)
 - 24 [ONS \(2023\) Gender identity, England and Wales: Census 2021](#)
 - 25 [Trust for London \(2023\) Census 2021 deep dive: gender identity and deprivation in London](#)
 - 26 [ONS \(2025\) Population estimates by marital status and living arrangements, England and Wales: 2024](#)
 - 27 [ONS \(2025\) Civil partnerships in England and Wales data 2024](#)
 - 28 [The Migration Observatory \(2024\) Migrants in the UK: An Overview](#)
 - 29 [Mayor of London \(2022\) Survey of Londoners 2021-22: Headline findings](#)
 - 30 [GLA \(2023\) London's diverse population](#)
 - 31 [Centre for London \(2020\) How do LGBT+ people experience life in the capital?](#)
 - 32 [Trust for London \(2023\) Census 2021 deep dive: gender identity and deprivation in London](#)
 - 33 GLA analysis of Households Below Average Income data (2021-24)
 - 34 The Households Below Average Income report classifies individual ethnicities according to the ethnic group of the household reference person (usually the highest earner in the household) which means that information about households of multiple ethnicities is lost.
 - 35 [Institute of Health Equity \(2023\) The Rising Cost of Living: A Review of Interventions to Reduce Impacts on Health Inequalities in London](#)
 - 36 [Institute of Health Equity \(2024\) Structural Racism, Ethnicity and Health Inequalities in London](#)
 - 37 [GLA \(2024\) Snapshot of Health Inequalities in London](#)
 - 38 [GLA \(2024\) Health Inequalities in London: Climate and Environment Pack – Building the Evidence Data Working Group](#)
 - 39 [Latin Elephant \(2021\) Supporting migrant and ethnic communities throughout regeneration in London](#)

-
- 40 [Office for Health Improvement and Disparities \(2025, updated 2026\) Health of the region data explorer](#)
 - 41 [Department of Health and Social Care – Fingertips, Public health profiles – Public Health Outcomes Framework: A01b – Life expectancy at birth \(Female, 3 year range\)](#)
 - 42 [Department of Health and Social Care – Fingertips, Public health profiles website](#)
 - 43 [Mayor of London \(2025\) Health Inequalities Strategy Implementation Plan 2025-2028](#)
 - 44 [Department of Health and Social Care – Fingertips, Public health profiles – Adult mental health and wellbeing](#)
 - 45 GLA analysis of English Housing Survey (2020-23)
 - 46 [GLA \(2025\) Housing in London annual report](#)
 - 47 [Inclusion London \(2025\) Barriers at Home: Housing crisis for Deaf and Disabled Londoners](#)
 - 48 [Inclusion London \(2025\) Barriers at Home: Housing crisis for Deaf and Disabled Londoners](#)
 - 49 [GLA \(2022\) Housing Research Note 8 – Housing and race equality in London: An analysis of secondary data](#)
 - 50 [AKT \(2025\) There's no place like home – Uncovering LGBTQ+ youth homelessness in the UK](#)
 - 51 [Department of Health and Social Care – Fingertips, Public health profiles – Obesity, physical activity and nutrition](#)
 - 52 [Department of Health and Social Care – Fingertips, Public health profiles – Obesity, physical activity and nutrition: Percentage of physically inactive adults \(19+ yrs\)](#)
 - 53 [Mayor of London – Making walking count](#)
 - 54 [UK Government \(2019\) UK Chief Medical Officers' Physical Activity Guidelines](#)
 - 55 [Mayor of London \(2025\) Delivering the Mayor's Transport Strategy 2024/25](#)
 - 56 GLA analysis of ONS Annual Population Survey (2024)
 - 57 GLA City Intelligence based on ONS ASHE/Annual Population Survey

-
- 58 [APPG for UN Women \(2021\) Prevalence and reporting of sexual harassment in UK public spaces](#)
 - 59 [Latin Elephant \(2021\) Supporting migrant and ethnic economies through regeneration in London](#)
 - 60 [Association of Leading Visitor Attractions \(2025\) Latest visitor figures](#)
 - 61 [Department for Levelling Up, Housing and Communities \(2023, updated 2024\) Anti-Social Behaviour Action Plan](#)
 - 62 [Public Health England \(2017\) Spatial planning for health: evidence review](#)
 - 63 [UK Government \(2024\) Chief Medical Officer's Annual Report 2024 – Health in Cities](#)
 - 64 [Ministry of Housing, Communities and Local Government \(2012, update 2025\) National Planning Policy Framework](#)
 - 65 [Homes England \(2026\) Guidance: Healthy Homes – a foundation for healthier and resilient communities](#)
 - 66 [Department of Health and Social Care \(2025\) 10 Year Health Plan for England: fit for the future](#)
 - 67 [Casey Commission: Independent Commission on Adult Social Care – Terms of reference](#)
 - 68 [Department of Health and Social Care and Ministry of Housing, Communities and Local Government \(2025\) Better Care Fund policy framework 2025 to 2026](#)
 - 69 [Prime Minister's Office – Plan for Change: Milestones for Mission-Led Government](#)
 - 70 [UK Health Security Agency \(2023\) UKHSA Strategic Plan 2023 to 2026](#)
 - 71 [Prime Minister's Office, Cabinet Office and Department of Health and Social Care \(2024\) Build Back Better: Our Plan for Health and Social Care](#)
 - 72 [Public Health England \(2020\) Using the planning system to promote healthy weight environments](#)
 - 73 [Public Health England \(2019\) PHE Strategy 2020-25](#)
 - 74 [The Environmental Noise \(England\) Regulation 2006](#)
 - 75 [The Marmot Review \(2010\) Fair Society, Healthy Lives](#)
 - 76 [The Marmot Review \(2011\) The Marmot Review: Implications for Spatial Planning](#)

-
- 77 [The Marmot Review \(2020\) Marmot Review 10 Years On](#)
 - 78 [Mayor of London \(2025\) Health Inequalities Strategy Implementation Plan 2025-2028](#)
 - 79 [Institute of Health Equity \(2022\) Evidence Review: Housing and Health Inequalities in London](#)
 - 80 [National Infrastructure and Service Transformation Authority \(2025\) UK Infrastructure: A 10 Year Strategy](#)
 - 81 [Department for Transport \(2023\) Future of Transport: supporting rural transport innovation](#)
 - 82 [National Highways \(2023\) Environmental Sustainability Strategy](#)
 - 83 [Department for Transport and Active Travel England \(2023\) The second cycling and walking investment strategy \(CWIS2\)](#)
 - 84 [Department for Transport \(2022\) Cycling and walking investment strategy report to Parliament 2022](#)
 - 85 [Department for Transport \(2021, updated 2023\) Decarbonising Transport: A Better, Greener Britain](#)
 - 86 [Department for Transport \(2020\) Decarbonising Transport: Setting the Challenge](#)
 - 87 [Ministry of Housing, Communities and Local Government \(2025\) Guide to the Planning and Infrastructure Bill](#)
 - 88 [Ministry of Housing, Communities and Local Government \(2025\) Guide to the Renters' Rights Act](#)
 - 89 [Ministry of Housing, Communities and Local Government \(2020, updated 2021\) The charter for social housing residents: social housing white paper](#)
 - 90 [Department for Communities and Local Government \(2015\) Technical housing standards – nationally described space standard](#)
 - 91 [Environment Act 2021](#)
 - 92 [Department for Environment, Food and Rural Affairs \(2025\) Environmental Improvement Plan \(EIP\) 2025](#)
 - 93 [Natural England – Green Infrastructure Framework](#)
 - 94 [Environment Agency \(2022\) Working with nature: Chief Scientist's Group report](#)

-
- 95 [Department for Environment, Food and Rural Affairs \(2022\) Establishing the Best Available Techniques for the UK \(UK BAT\)](#)
 - 96 [Department for Environment, Food and Rural Affairs \(2023\) Waste prevention programme for England: Maximising Resources, Minimising Waste](#)
 - 97 [The Migration Observatory \(2024\) Migrants in the UK: An Overview](#)
 - 98 [Mayor of London \(2022\) Survey of Londoners 2021-22: Headline Findings](#)
 - 99 [APPG for UN Women \(2021\) Prevalence and reporting of sexual harassment in UK public spaces](#)
 - 100 [Centre for London \(2020\) How do LGBT+ people experience life in the capital?](#)
 - 101 ONS – Census 2021
 - 102 Trust for London
 - 103 GLA analysis of Households Below Average Income data (2021-24)
 - 104 The Households Below Average Income report classifies individual ethnicities according to the ethnic group of the household reference person (usually the highest earner in the household) which means that information about households of multiple ethnicities is lost.
 - 105 GLA analysis of ONS Annual Population Survey (2024)
 - 106 [Institute of Health Equity \(2023\) The Rising Cost of Living: A Review of Interventions to Reduce Impacts on Health Inequalities in London](#)
 - 107 [Institute of Health Equity \(2024\) Structural Racism, Ethnicity and Health Inequalities in London](#)
 - 108 [GLA \(2024\) Snapshot of Health Inequalities in London](#)
 - 109 [GLA \(2024\) Health Inequalities in London: Climate and Environment Pack – Building the Evidence Data Working Group](#)
 - 110 [Public Health England – Written Evidence \(BEN0186\) – Impact of Built Environment on Health and Wellbeing](#)
 - 111 [Office for Health Improvement and Disparities \(2025, updated 2026\) Health of the region data explorer](#)
 - 112 [Department of Health and Social Care – Fingertips, Public health profiles – Public Health Outcomes Framework: A01b – Life expectancy at birth \(Female, 3 year range\)](#)

-
- 113 [Department of Health and Social Care – Fingertips, Public health profiles website](#)
 - 114 [Mayor of London \(2025\) Health Inequalities Strategy Implementation Plan 2025-2028](#)
 - 115 [ONS – nomis website](#)
 - 116 [Office for Health Improvement and Disparities – COVID-19 Health Inequalities Monitoring for England \(CHIME\) tool](#)
 - 117 [Department of Health and Social Care – Health trends in England – Musculoskeletal health in London](#)
 - 118 [Department of Health and Social Care – Fingertips, Public health profiles – Adult mental health and wellbeing](#)
 - 119 Segmentation Model developed by Data, Analysis and Intelligence Service (DAIS) in NHSEI, Public Health England (PHE), Outcomes Based Healthcare (OBH) and Arden & GEM CSU
 - 120 [Trust for London \(2023\) Census 2021 deep dive: disability and deprivation in London](#)
 - 121 [Institute of Health Equity – Evidence Review: Housing and Health Inequalities in London](#)
 - 122 [Institute for Health Metrics and Evaluation – Health research by location: United Kingdom – London](#)
 - 123 [Department of Health and Social Care – Fingertips, Public health profiles – Smoking](#)
 - 124 [Department of Health and Social Care – Fingertips, Public health profiles – Obesity, physical activity and nutrition](#)
 - 125 [Department of Health and Social Care – Fingertips, Public health profiles – Obesity, physical activity and nutrition](#)
 - 126 [Department of Health and Social Care – Fingertips, Public health profiles – Obesity, physical activity and nutrition: Obesity prevalence in adults \(using adjusted self-reported height and weight\)](#)
 - 127 [Department of Health and Social Care – Fingertips, Public health profiles – Obesity, physical activity and nutrition: Percentage of adults meeting the ‘5-a-day’ fruit and vegetable consumption recommendations \(new method\)](#)

-
- 128 [Department of Health and Social Care – Fingertips, Public health profiles – Obesity, physical activity and nutrition](#)
 - 129 [Department of Health and Social Care – Fingertips, Public health profiles – Obesity, physical activity and nutrition: Percentage of physically inactive adults \(19+ yrs\)](#)
 - 130 [Mayor of London – Making walking count](#)
 - 131 [UK Government \(2019\) UK Chief Medical Officers’ Physical Activity Guidelines](#)
 - 132 [Mayor of London \(2025\) Delivering the Mayor’s Transport Strategy 2024/25](#)
 - 133 [London Sport \(2025\) New Data Highlights Stark Physical Activity Divide Across London – And The Urgent Need For Action](#)
 - 134 Macdonald, L., Olsen, J. R., Shortt, N. K., Ellaway, A. (2018) Do ‘environmental bads’ such as alcohol, fast food, tobacco, and gambling outlets cluster and co-locate in more deprived areas in Glasgow City, Scotland? Health Place. 2018 May;51:224-231.
 - 135 [Department of Health and Social Care – Fingertips, Public health profiles – Wider Determinants of Health – Gambling premises per 100,000 population 2025, Crude rate – per 100,000](#)
 - 136 [NHS England \(2025\) General Practice Workforce, 30 September 2025](#)
 - 137 [NHS England – Health building notes](#)
 - 138 [NHS England \(2025\) Capital guidance 2025/26](#)
 - 139 [London Assembly \(2024\) Early years childcare in London – Economy Committee](#)
 - 140 [coram \(2025\) Childcare Survey 2025](#)
 - 141 [GLA City Intelligence \(2024\) London’s population of young children – current and future](#)
 - 142 [GLA City Intelligence \(2025\) Subregional Pupil Projections](#)
 - 143 [County Councils Network \(CCN\) \(2025\) Councils warn SEND system faces total collapse without major reform to services](#)
 - 144 [UCAS \(2023\) What does the Journey to a Million mean for London?](#)
 - 145 [London Libraries website](#)
 - 146 GLA Pubs Audit 2022, based on ONS data

-
- 147 [Mayor of London Office for Policing and Crime \(MOPAC\) \(2025\) Public Voice Insights: Learning from the MOPAC Public Voice Surveys – Quarter 1 2025-26](#)
 - 148 [Transport for London \(2023\) Travel in London 2023: Annual Overview](#)
 - 149 [Historic England \(2025\) Heritage Counts – Indicator Data – Designated Assets, Protected Areas and the Built Environment](#)
 - 150 [UNESCO World Heritage Convention \(2025\) 47th session of the World Heritage Committee](#)
 - 151 [Historic England – The London Historic Character Thesaurus – Full Listing of Character Type Terms](#)
 - 152 ONS – Workforce jobs by industry, seasonally adjusted; ONS – Mid-year population estimates; Ministry of Housing, Communities and Local Government – Dwelling stock data
 - 153 VOA (2025) Council Tax Stock of Properties 2025. Chart excludes the Isles of Scilly, which saw a 3% decrease in this period. The Council Tax definition of domestic properties includes some communal residences that are excluded from Ministry of Housing, Communities and Local Government’s dwelling stock statistics.
 - 154 Ministry of Housing, Communities and Local Government – Data from Live Table 1011 (2015/16-2022/23), and the number of those which were funded through the GLA’s affordable housing programmes (2018/19-2023/24)
 - 155 Ministry of Housing, Communities and Local Government – Affordable Housing Supply Live Table 1011. The figures include acquisitions and do not net off losses to the stock and therefore represent gross completions.
 - 156 Ministry of Housing, Communities and Local Government – English Housing Survey and English House Condition Survey. Data for 2020 and 2021 was modelled by the ministry as surveyors were unable to carry out internal inspections of properties due to the Covid-19 pandemic, while 2022 data combined modelled and surveyed results.
 - 157 Ministry of Housing, Communities and Local Government – Live Tables on Energy Performance of Buildings Certificates
 - 158 Department for Business, Energy and Industrial Strategy – Fuel poverty statistics. Fuel poverty is measured according to the ‘low-income high costs AHC equivalised income’ definition.
 - 159 ONS – Price Index of Private Rent statistics. These figures exclude any cases where the tenant receives Housing Benefit.

-
- 160** ONS – House Price Index quarterly tables. These figures are calculated as the difference between the mean price and the mean advance, and are simple mean averages, unadjusted for inflation or the mix of properties sold. In the last decade an increasing proportion of the gap is likely to be due to the use of Help to Buy.
- 161** UK House Price Index (UKHPI) adjusted for retail price inflation (data is quarterly until the end of 1994 and monthly thereafter and data for recent months is subject to revision as it is based on a relatively small number of transactions)
- 162** GLA analysis of English Housing Survey (2020-23)
- 163** [GLA \(2025\) Housing in London annual report](#)
- 164** [Inclusion London \(2025\) Barriers at Home: Housing crisis for Deaf and Disabled Londoners](#)
- 165** [GLA – Domestic abuse safe accommodation and support](#)
- 166** [Inclusion London \(2025\) Barriers at Home: Housing crisis for Deaf and Disabled Londoners](#)
- 167** Compiled by GLA from Housing Finance Review 1995/96; UK Housing Review 2004/05; MHCLG Live Tables 775 and TA1. Children are those aged under 19.
- 168** Ministry of Housing, Communities and Local Government – Survey of English Housing and English Housing Survey data, using three-year rolling averages. Figures for the years 2020/21 to 2023/24 are likely to be under-estimates due to effects of the pandemic on data collection. 2006 definition of bedroom standard and rolling three-year averages used. The shaded area represents the pandemic period.
- 169** GLA Economics – London’s Economic Outlook: Spring 2025
- 170** [UK Parliament POST \(2022\) The impact of remote and hybrid working on workers and organisations, POSTbrief 49](#)
- 171** GLA Economics using ONS UK regional GVA and GDP data
- 172** [ONS \(2023\) Characteristics of homeworkers, Great Britain: September 2022 to January 2023](#)
- 173** [Association of Leading Visitor Attractions \(ALVA\) \(2025\) Latest Visitor Figures](#)
- 174** [GLA \(2025\) London Low Carbon Market Snapshot 2025](#)
- 175** London Growth Plan (2025)

-
- 176 [Social Market Foundation \(2022\) Working lives: Experiences of in-work poverty in London](#)
- 177 GLA City Intelligence based on ONS ASHE/Annual Population Survey
- 178 [GLA Economics \(2024\) London at Night: An Updated Evidence Base for a 24 Hour City](#)
- 179 CBRE Research (2024) What does the future hold for Central London's Office supply?
- 180 London Industrial Land Supply Study 2023
- 181 The condition of the air with respect to the presence (or absence) of pollutants in the air e.g.
- 181 The condition of the air with respect to the presence (or absence) of pollutants in the air e.g. NO_x, NO₂, PM and the resulting impact this has on London's compliance with legal standards, public health and inequality.
- 182 [Mayor of London \(2024\) Air Quality in London 2016-2024](#)
- 183 [Earth.org \(2024\) Top 5 Environmental Challenges in London and How the City is Addressing Them](#)
- 184 Northern Ireland is not included as no air pollution monitoring sites with sufficient data capture were available.
- 185 Reference-grade air quality monitors follow a method that represents the scientific standard for air quality monitors and are used for assessing compliance with legal limits and targets.
- 186 40µg/m³
- 187 [Greenspace Information for Greater London CIC \(GiGL\) \(2026\) Key London Figures](#)
- 188 [The London Wildlife Sites Board \(LWSB\) \(2019\) Advice Note: Process for selecting and confirming Sites of Importance for Nature Conservation \(SINCs\) in Greater London](#)
- 189 This is a core London-level outcome indicator.
- 190 [Greenspace Information for Greater London CIC \(GiGL\) website](#)
- 191 GiGL (2024)
- 192 [Mayor of London \(2018\) London Environment Strategy](#)

-
- 193** As listed on Section 41 of The Natural Environment and Rural Communities (NERC) Act as habitats of principal importance for the conservation of biodiversity in England.
- 194** [Mayor of London – Local Nature Recovery Strategy](#)
- 195** Greenspace Information for Greater London CIC (2025) personal communication
- 196** Mayor of London (2002) Connecting with London's Nature: The Mayor's Biodiversity Strategy
- 197** London Natural History Society (2017) The London Bird Atlas
- 198** Mayor of London (unpublished) Mayor's Biodiversity Strategy Update
- 199** Sustain (2024) Growing for Nature Biodiversity survey for community food growing spaces
- 200** [London City Farms & Community Gardens – London City Farms](#)
- 201** Figures from the National Allotment Association London Branch webpage
- 202** This is a core London-level outcome indicator.
- 203** Access to green space in England
- 204** [GLA \(2026\) London Green Infrastructure Framework \(LGIF\)](#)
- 205** [GLA \(2026\) London Green Infrastructure Framework \(LGIF\)](#)
- 206** [London Wildlife Trust \(2011\) London: Garden City?](#)
- 207** [GLA City Intelligence \(2025\) The State of London – A review of London's economy and society](#)
- 208** [GLA \(2024\) Green Cover 2024](#)
- 209** [Treeconomics London \(2015\) Valuing London's Urban Forest – Results of the London i-Tree Eco Project](#)
- 210** [Treeconomics London \(2015\) Valuing London's Urban Forest – Results of the London i-Tree Eco Project](#)
- 211** GLA (2018) London Environment Strategy
- 212** Sales, K., Walker, H., Sparrow, K., Handley, P., Vaz Monteiro, M., Hand, K. L., Buckland, A., Chambers-Ostler, A. and Doick, K. J. (2023) The canopy cover Webmap of the United Kingdom's towns and cities. Arboricultural Journal, 45(4), pp.258-289.

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- 213** [Woodland Trust, American Forests and Centre for Sustainable Healthcare \(2023\) Tree Equity Score UK](#)
- 214** [GLA City Intelligence \(2025\) The State of London – A review of London’s economy and society](#)
- 215** Values are weighted values, with blank responses removed from total for comparable results across years.
- 216** Based on partial data until June 2024.
- 217** [GLA – London Energy and Greenhouse Gas Inventory \(LEGGI\)](#)
- 218** [GLA City Intelligence \(2025\) The State of London – A review of London’s economy and society](#)
- 219** ONS (2025) Energy efficiency of housing in England and Wales
- 220** [GLA City Intelligence \(2025\) The State of London – A review of London’s economy and society](#)
- 221** [BBC News \(2022\) Guy’s and St Thomas’ systems hit by ‘ludicrous’ heatwave](#)
- 222** [UK Health Security Agency \(2025\) Heat mortality monitoring report: 2022](#)
- 223** [UK Climate Risk \(2021\) Summary for England \(CCRA3- IA\)](#)
- 224** [Environment Agency and Department for Environment, Food and Rural Affairs \(2021\) Water stressed areas – 2021 classification](#)
- 225** [Mayor of London \(2024\) The London Climate Resilience Review](#)
- 226** Environment Agency (2026) Response to London Plan Draft IIA Scoping Report consultation
- 227** This is a core London-level outcome indicator. Currently, data for this indicator has been manually collated in personal communications with Thames Water, London’s largest water company, and are not available for the other water companies.
- 228** [Environment Agency \(2024\) Water resources 2023-2024: analysis of the water industry’s annual water resources performance](#)
- 229** GLA (2025) Draft London Regional Flood Risk Assessment Report
- 230** GLA (2025) Draft London Regional Flood Risk Assessment Report
- 231** This is a core London-level outcome indicator. The number of properties flooded in London has been sought manually via personal communication with the Environment Agency.

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- 232** [Met Office \(2024\) Record-breaking rainfall for some this September](#)
- 233** [National Audit Office \(2023\) Government resilience: extreme weather](#)
- 234** [Environment Agency and Department for Environment, Food and Rural Affairs \(2021\) Thames Estuary 2100: 10-year monitoring review \(2021\)](#)
- 235** [Environment Agency \(2023\) Thames Estuary 2100: Time to Plan and Time to Act](#)
- 236** [Environment Agency \(2024, updated 2025\) New national flood and coastal erosion risk information](#)
- 237** Environment Agency (2024) National assessment of flood and coastal erosion risk in England 2024
- 238** Mayor of London (2022) Mayor warns Londoners in basement properties about flooding
- 239** Zurich UK (2022) Two-fifths of London firms at risk of climate-fuelled flash floods
- 240** [London Resilience Partnership \(2022\) Strategic Flood Response Framework](#)
- 241** Environment Agency (2022) Social Deprivation and the Likelihood of Flooding
- 242** [Flood Ready London \(2025\) London Surface Water Strategy](#)
- 243** [Green Match \(2024\) Average Fossil Fuel Consumption in UK Cities](#)
- 244** [Earth.org \(2024\) Top 5 Environmental Challenges in London and How the City Is Addressing Them](#)
- 245** [BBC News \(2020\) Climate change: The challenges facing London](#)
- 246** Mayor of London – London Infrastructure Plan 2050
- 247** [UK Government – Hydrogen applications in Thames Estuary](#)
- 248** [Department for Energy Security and Net Zero \(2025\) Sub-regional fuel poverty in England, 2025 report \(2023 data\)](#)
- 249** Department for Energy Security and Net Zero (2025) Annual Fuel Poverty Statistics in England (2024 data)
- 250** [GLA Intelligence – Economic Fairness – Fuel Poverty](#)
- 251** The Chartered Institute of Building (HEA0034)
- 252** [Natural England \(2017\) Likelihood of Best and Most Versatile \(BMV\) Agricultural Land – Strategic scale map London and the South East \(ALC019\)](#)

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- 253** SLR Model CDP Reporting tab – Indicated total waste generation includes estimated contributions from household waste, and municipal-like C&I waste (please note that due to a lack of availability of relevant data, C&D waste is excluded). Moreover, the C&I waste contributions to this total is provided on an indicative basis only, being extrapolated from historical estimates (assuming linkages to trends in employment in London). Provided estimates for waste generation may be updated as the evidence base improves. This estimate is rounded to the nearest 100 ktpa to avoid over precision.
- 254** [Department for Environment, Food and Rural Affairs \(2012, updated 2026\) Local authority collected waste management – annual results](#)
- 255** [Department for Environment, Food and Rural Affairs \(2012, updated 2026\) Local authority collected waste management – annual results](#)
- 256** [Department for Environment, Food and Rural Affairs \(2012, updated 2026\) Local authority collected waste management – annual results](#)
- 257** [GLA City Intelligence \(2025\) The State of London – A review of London's economy and society](#)
- 258** [Department for Environment, Food and Rural Affairs \(2012, updated 2026\) Local authority collected waste management – annual results](#)
- 259** London Environment Strategy 2018
- 260** [ReLondon \(2024\) Report – London's packaging footprint: an analysis of packaging material flows, greenhouse gas emissions and lever for climate action in London](#)
- 261** [GLA and Environment Agency \(2025\) Waste Map](#)
- 262** Mayor of London (2018) Local Aggregates Assessment for London
- 263** Mayor of London (2018) Local Aggregates Assessment for London
- 264** Mayor of London (2018) Local Aggregates Assessment for London
- 265** Mineral Products Association and Rail Freight Group (2016) Why is Rail Freight Vital for Housing and Construction?
- 266** [SW Londoner \(2022\) Londoners exposed to the second most road traffic noise in Europe](#)
- 267** [Metro \(2022\) Noise pollution map shows worst affected areas in London](#)
- 268** [CPRE \(2018\) London parks: oases of calm... or noisy and polluted places?](#)

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- 269** [Department for Work and Pensions and Department for Business and Trade \(2026\) Keep Britain Working: Final report](#)
- 270** [Environment Agency \(2022\) Thames river basin district river basin management plan: updated 2022](#)
- 271** [Environment Agency \(2022\) Thames river basin management plan, updated 2022: habitats regulation assessment](#)
- 272** [GLA City Intelligence – London’s River Health map](#)
- 273** [Civil Aviation Authority \(2024\) Noise Exposure Contours for Stansted Airport 2023 – ERCD Report 2403](#)
- 274** [London Gatwick \(2025\) Our current noise contour](#)

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Bristol

12th Floor, Beacon Tower, Colston Street, Bristol BS1 4XE
0117 389 0700
bristol@landuse.co.uk

Cardiff

Room 1.12, 1st Floor, Brunel House, 2 Fitzalan Rd, Cardiff CF24 0EB
0292 254 0920
cardiff@landuse.co.uk

Edinburgh

Atholl Exchange, 6 Canning Street, Edinburgh EH3 8EG
0131 326 0900
edinburgh@landuse.co.uk

Glasgow

37 Otago Street, Glasgow G12 8JJ
0141 403 0900
glasgow@landuse.co.uk

London

250 Waterloo Road, London SE1 8RD
020 7199 5801
london@landuse.co.uk

Manchester

4th Floor, 57 Hilton Street, Manchester M1 2EJ
0161 802 2800
manchester@landuse.co.uk

Sheffield

32 Eyre Street, Sheffield, S1 4QZ
0114 392 2366
sheffield@landuse.co.uk

landuse.co.uk

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