

DELIVERING LONDON'S ENERGY FUTURE

THE MAYOR'S CLIMATE CHANGE MITIGATION
AND ENERGY STRATEGY

INTEGRATED IMPACT ASSESSMENT POST ADOPTION STATEMENT

DECEMBER 2011

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1. Introduction

This document comprises the Post Adoption Statement (PAS) required by Regulations 16 (1) and (2) of the Environmental Assessment of Plans and Programmes Regulations 2004, otherwise known as the “SEA Regulations”. Regulation 16 sets out the requirements for the ‘Post Adoption Procedures’ to be undertaken following the adoption of the revised London Climate Change Mitigation and Energy Strategy (CCMES). They include the publication of the revised CCMES and its accompanying Integrated Impact Assessment (IIA) Report, including the Environmental Report and this PAS.

2. The Revised Mayor’s Climate Change Mitigation and Energy Strategy

In accordance with his statutory duty under the Greater London Authority (GLA) Act 1999, the Mayor of London has prepared a London Climate Change Mitigation and Energy Strategy called “Delivering London’s Energy Future: The Mayor’s Climate Change Mitigation and Energy Strategy” that sets out his policies and proposals with respect to the contribution to be made in Greater London towards the mitigation of climate change and the achievement of any objectives specified or described in national policies relating to energy. The CCMES was approved, formally adopted and published by the Mayor on 26 October 2011.

The CCMES sets out the Mayor’s policies and programmes to reduce London’s CO₂ emissions by 60 per cent of 1990 levels by 2025, secure a low carbon energy supply for London, maximise the economic opportunities of the transition to a low carbon London, and meeting national and international climate change and energy objectives. This includes actions that the Mayor encourages other bodies or persons, including government, London boroughs, energy companies, businesses, private sector funders, and Londoners to take. It adopts a sector-by-sector approach, addressing CO₂ emissions from energy supply, homes, workplaces and transport.

The CCMES is consistent with other Mayoral strategies, including the London Plan 2011, the Mayor’s Transport Strategy, the Mayor’s Air Quality Strategy, and the Mayor’s Municipal Waste Management Strategy.

The CCMES is available at: <http://www.london.gov.uk/who-runs-london/mayor/publication/climate-change-mitigation-energy-strategy>.

3. The Integrated Impact Assessment (IIA) of the CCMES

The preparation of the revisions to the CCMES has been subject to procedural and legal requirements, including the SEA Regulations, necessitating assessment of how the CCMES will affect people, places and environmental conditions in Greater London. To fulfil these requirements, the GLA undertook the IIA. The IIA Report on the CCMES conformed with the requirements of an Environmental Report under the SEA Regulations. The IIA Report comprises an integrated assessment of the likely significant effects of the CCMES, incorporating the following assessments:

- Strategic Environmental Assessment (SEA);

- Health Impact Assessment (HIA);
- Equality Impact Assessment (EIA); and
- Economic Impact Assessment.

The IIA Report also includes an assessment of the likely significant effects of the CCMES on community safety (as required under s17 of the Crime and Disorder Act 1998, as amended).

In undertaking the IIA, the intention was to ensure that commonalities, inter-related issues and synergies between the above assessments and their outputs were identified in a systematic manner and used to inform the revised CCMES development process.

The IIA process and methodology are described in the IIA Report which accompanied the publication of the draft CCMES for public and stakeholder consultation. The report was made available for consultation between October 2010 and January 2011. The IIA Report is available at <http://www.london.gov.uk/who-runs-london/mayor/publication/climate-change-mitigation-energy-strategy>.

4. The purpose of the Post Adoption Statement (PAS)

The preparation of a PAS is a requirement of the SEA Regulations. Regulation 16(1) and (2) requires that a statement is prepared and published following the adoption of the CCMES and the publication of the IIA Report, containing the following particulars set out in Regulation 16 (4):

- How environmental considerations have been integrated into the CCMES;
- How the environmental report has been taken into account;
- How opinions expressed by consultees in response to the invitation referred to in Regulation 13(2)(d) have been taken into account;
- Action taken by the responsible authority in accordance with Regulation 13(4) has been taken into account and how the results of any consultations entered under Regulation 14(4) have been taken into account;
- The measures that are to be taken to monitor the significant environmental impacts of the implementation of the CCMES.

Consistent with the approach of the IIA, this PAS addresses not only environmental matters in accordance with the SEA Regulations, but all aspects of sustainability (including environmental, social and economic matters) covered by the IIA.

The PAS is structured in accordance with the requirements of the SEA Regulations.

5. How environmental and wider sustainability considerations have been integrated into the revised CCMES and how the IIA report has been taken into account

In accordance with the requirements of Regulation 16(4)(a) and (b), this section sets out how environmental considerations and wider considerations of sustainability have been integrated into the development of the CCMES; and how the principal output of

the IIA, the IIA Report (incorporating the SEA Environmental Report) has been taken into account in determining the content of the CCMES.

The IIA process

The IIA process began in early 2009 with the development of a Scoping Report which set out the scope and nature of the process and its role in the development of the revisions of the CCMES. The Scoping Report contained a draft assessment framework for evaluating the impacts of the draft revisions and their potential to achieve the following objectives:

- To maximise the mental and physical health and well-being of the population and reduce inequalities in health.
- To enhance community safety by reducing crime and the fear of crime, anti-social behaviour and misuse of drugs, alcohol and other substances.
- To ensure equitable outcomes for all communities, particularly those most at risk to experience discrimination, poverty and social exclusion, and celebrate the unique ethnic and cultural diversity of London's citizens.
- To create and sustain liveable environments that promote social cohesion, sustainable lifestyles and a sense of place.
- To enhance and protect the built, historic and cultural environment.
- To ensure that Londoners are respected as citizens, that their voices are heard, and that they are supported, engaged with and allowed to actively participate in changing their lives to be sustainable and low carbon.
- To maximise accessibility for all in London to housing, key services and amenities and increase the proportion of journeys made by public transport, by bicycle and by foot.
- To encourage a strong, diverse, low carbon and prosperous economy, with resilient businesses and organisations, so that all Londoner's can enjoy a good quality of life, with rewarding and satisfying employment and the opportunity to develop and improve their skills.
- To conserve and enhance local and global natural habitats and wildlife and bring nature closer to people.
- To conserve and enhance the supply and quality of water resources and prevent flooding.
- To improve local, national and international air quality.
- To address the causes of climate change through minimising the emissions of greenhouse gases by reducing consumption of energy at source, achieving greater energy efficiency, supplying renewable and efficient energy and reducing reliance on fossil fuels.
- To ensure that London is prepared for the impacts of climate change and is taking steps to reduce flood risk.
- To use resources efficiently, minimise the production of waste across all sectors, and maximise useful recovery of materials and energy.
- To provide educational opportunities so that new generations can understand environmental, social and economic issues and take their learning into decision making as adults.

The Scoping Report was published in June 2009 and disseminated to the three SEA statutory consultees (English Heritage, the Environment Agency and Natural England) for consultation. No changes to the objectives were made as a result of that consultation process. A copy of the Scoping Report is available at: http://www.london.gov.uk/sites/default/files/IIA_Scoping_report.pdf

The assessment of the possible strategic climate change mitigation and energy policy options to be considered in developing the CCMES was an iterative process carried out in cooperation with independent consultants Levett Therivel (the IIA consultancy team) from summer 2009.

6. How environmental and wider sustainability considerations have been integrated into the CCMES

From the outset of the IIA process there was a clear focus on environmental and wider sustainability considerations in the drafting of the CCMES. The IIA framework was used to test the environmental and wider sustainability of emerging policies and proposals. To facilitate this exercise, there was close and ongoing communications between the GLA CCMES drafting team and the IIA consultancy team on sustainability matters. This was facilitated by means of:

- meetings between policy teams and the IIA consultancy team
- provision of written feedback by the IIA team on iterations of the draft CCMES
- ongoing review of iterations of proposed sections of the draft CCMES.

Through preliminary assessment, constructive challenge and ongoing review of the iterations of the emerging policies and proposals of the draft CCMES, environmental and wider sustainability policy considerations were identified and integrated into the revised CCMES as a result of the IIA process.

7. How the IIA report has been taken into account

The IIA process described above provided the means by which the drafting of the CCMES was positively influenced and shaped by considerations of environmental and wider sustainability. Overall, the IIA report predicted that implementation of the public consultation draft CCMES would:

- be highly beneficial for its main objectives of reducing greenhouse emissions and energy use
- be highly beneficial for the economy, by increasing demand for energy efficiency and renewable energy products and services and supporting investment and businesses in these fields
- contribute to climate change adaptation, by reducing dependence on fossil energy
- have generally positive effects on health (through reducing fuel poverty and promoting cycling and walking), equalities (because fuel poverty most affects the least well off) and air quality (through reducing fossil fuel use)
- have few, small, but generally positive effects on other IIA objectives.

No changes were considered necessary to these conclusions as a result of changes made to the final CCMES following consultation on the public draft CCMES.

The IIA Report also made recommendations that were taken into account in developing the CCMES for final adoption. The recommendations are summarised below along with how they have been incorporated into the final CCMES:

	<i>IIA recommendation</i>	<i>CCMES response</i>
1	The Mayor's energy hierarchy: Be lean (use less energy); be clean (supply energy efficiently) and be green (use renewable energy) should be introduced early and applied throughout the CCMES, but as a rule of thumb for considering policy options, not a rigid prescription.	The CCMES considered options that to deliver the target to reduce London's CO ₂ emissions by 60 per cent of 1990 levels by 2025. These includes measures to use less energy (through energy efficiency programmes), supply energy efficiently (particularly through the Mayor's policies on decentralised energy) and use renewable energy. The recently published Decentralised Energy capacity Study sets out London's capacity for local energy generation, including renewables, and this has formed the evidence based for the CCMES.
2	Statistics on and targets for energy use and carbon emissions quoted in the CCMES, and discussion of the carbon intensity of London's economy, should include indirect emissions. In particular, the 'headline' figure should be London's total and per resident direct and indirect emissions, including imports and transport but excluding production in London of goods and services for use elsewhere.	The scope of the CCMES (direct emissions only) is in line with international reporting guidelines and Defra's Guidance on measuring and reporting Greenhouse Gas Emissions. However, action 17.3 commits the Mayor to measure London's scope 3 indirect emissions. A comparison of London's direct and indirect emissions is also included in chapter 2.
3	The CCMES should include policies to reduce indirect emissions at a level of commitment and detail commensurate to the Mayor's ability to influence them.	The Mayor's administrative powers extend to the boundary of London. The CCMES therefore focuses on those emissions which occur within that boundary. However, the Mayor has also committed to measure London's scope 3 emissions.
4	Green energy business development should actively seek to provide skills and jobs to disadvantaged groups.	The Retrofit Employer Accord Pilot (REAP) provided brokerage between long-term workless Londoners and jobs created through the Mayor's retrofitting programmes. Contracts for

		programmes such as RE:NEW included requirements to work with the REAP.
5	The CCMES should give the greatest possible prominence to obviating energy use, for example by reducing the need to travel, the need for heat, artificial light and building services.	The evidence base and modelling behind the CCMES demonstrates that to meet the Mayor's target to reduce London's CO ₂ emissions by 60 per cent of 1990 levels by 2025 requires both energy supply measures and energy efficiency measures. The actions to deliver policies 6, 7, 8 and 10 all focus on energy efficiency.
6	The whole life carbon effects of all actions should be assessed in enough detail to provide reassurance that they are beneficial, and show how their carbon benefits can be maximised.	The lifetime CO ₂ savings of the Mayor's activities are included in the modelling which supports the CCMES. Measurements of London's scope 3 emissions will provide further data on whole life carbon impacts of activities for later updates of this strategy.
7	Detailed design and implementation of initiatives to promote more sustainable energy behaviour should be informed by impartial assessment of previous initiatives, not only in London, with particular attention to the reasons why uptake and effect of many of these schemes have fallen short of expectations.	The Mayor's programmes to reduce energy use have been developed based on experience from a range of initiatives. For example, the RE:NEW programme builds on the previous Green Homes Concierge Service, and uses an area-based approach as demonstrated in Kirklees. This is referenced in the CCMES.

8. Opinions expressed in response to public consultation and how these have been taken into account

In accordance with Regulation 16.4 (c) this section summarises the opinions received through consultation on the IIA and explains how these opinions were taken into account in determining the content of the CCMES.

The SEA Regulations required that the 'consultation bodies' for SEA (the Environment Agency, Natural England and English Heritage) were consulted along with public and other stakeholder consultees on the draft CCMES and the IIA Report, incorporating the Environmental Report. None of these organisations nor the public and or other stakeholders (including London boroughs) included specific reference to the IIA Report in their responses.

During the CCMES public consultation phase, the GLA hosted a workshop with people from organisations (including the Metropolitan Police, and the Church of England) representing the IIA assessment areas including community safety, health and inequalities, social inclusion, and governance. There was agreement amongst the

workshop attendees that the CCMES supported the achievement of the IIA objectives, and that the successful implementation of the CCMES would:

- have a positive impact on health through promotion of cycling and walking
- have the potential to reduce health costs through improved energy efficiency of homes and reduction of fuel poverty
- have the potential to improve social cohesion and community safety through area-based programmes such as RE:NEW and RE:CONNECT

The GLA produced a report on the public and stakeholder consultation on the draft CCMES which was published on its website alongside the CCMES at:

<http://www.london.gov.uk/who-runs-london/mayor/publication/climate-change-mitigation-energy-strategy>.

9. Reasons for choosing the CCMES as adopted in light of other reasonable alternatives dealt with

In accordance with Regulation 16.4 (e), this section summarises the alternatives considered in developing the CCMES and the reasons for choosing the CCMES in its adopted form in light of these alternatives.

Annex 2 of the IIA Report set out a range of alternative policies and proposals that were considered during the development of the CCMES. The main alternatives considered in developing the CCMES; their significant impacts; and the reasons given by authors for choosing the preferred alternative are set out in more detail in Annex A of this report.

The GLA considers that the reasons for not adopting these alternatives in the CCMES are still justified.

10. The measures that are to be taken to monitor the significant environmental and wider sustainability effects of the implementation of the CCMES

In accordance with Regulation 16.4 (f) and Regulation 17, this section summarises the monitoring measures that will be undertaken by the GLA to monitor the significant environmental and wider sustainability effects of the implementation of the CCMES.

The primary responsibility for undertaking monitoring of the delivery of the CCMES resides with the Mayor. The CCMES monitoring process is set out in policy 17 of the CCMES. The Mayor will produce an annual report on London's progress on meeting its CO₂ emissions reduction target, including annual estimated CO₂ emissions, and progress on Mayoral climate change mitigation programmes. Data from the London Energy and greenhouse Gas Inventory (LEGGI) will also be publically accessible London datastore which will allow anyone to analyse London's climate change mitigation and energy performance and suggest how improvements to performance can be made. For those policies where the impact is not readily quantified, professional judgement of the impact of the policies will be provided alongside indicators of the implementation of these policies.

The GLA will take into account the recommendations of the IIA Report when reporting on progress implementing the CCMES.

Annex A

Rationale behind proposed policies

Proposed Policy	Proposals	Summary of alternative policies considered? (if yes give details)	Summary rationale for decision
Target: Reduce London's CO ₂ emissions by 60% on 1990 levels, by 2025.		Continuation of existing target OR Reduce target OR Increase target	Target kept at current level to reflect the leading role that London can take in reducing CO ₂ emissions.
Policy 1 – Combining London's economic strengths, institutions, funding capability and brand to create the conditions that support low carbon growth and enable London's low carbon economy to prosper.	Supporting and developing London's existing economy, supporting inward investment, and lobbying, the Mayor will help to create the conditions in London that will drive low carbon growth. Proposals include: – Establishment of the London Green Fund – Using Mayoral climate change mitigation programmes to stimulate supply and demand for low carbon products and services – Developing the Green Enterprise District – Promote existing low carbon R&D programmes	Continue as usual or Working with partners and the GLA Group, the Mayor will ensure that London is well positioned to exploit its existing strengths and able to identify opportunities to develop new strengths so that it can capture, at least, its share of the future low carbon economy. Or Working with partners and the functional bodies, the Mayor will both stimulate demand for low carbon products and services and support business to access the associated supply chain opportunities. Or Combining London's economic strengths, institutions, funding capability and brand to create the conditions that support low carbon growth and enable London's low carbon economy to prosper. Or Deploying London's influence, capacity and resources to drive demand for and leverage investment in activity that promotes low carbon growth. Or	Reflected the role that London is best placed to undertake in supporting the transition from the strengths and existing sectors that it already has. Also reflected the role that London is playing in establishing large-scale programme and the demand this will create in the relevant sectors. Also plays to the existing R&D strengths that London has that will support product development, commercialisation and supply chain development.

Proposed Policy	Proposals	Summary of alternative policies considered? (if yes give details)	Summary rationale for decision
		Pursue a high carbon economic activity path over the medium-term and only move to low carbon activity when no high carbon economic options are available to London's businesses.	
Policy 2 - Helping Londoners to gain the skills and experience needed to participate in the low carbon economy	Co-ordinating the requirements for low carbon skills training and employment support, and lobbying government to provide the right policy framework, the Mayor will ensure that Londoners have the skills and awareness to participate in the low carbon economy. Proposals include: <ul style="list-style-type: none"> – understanding the employment and skills needed to support the low carbon sector in London – creating jobs and training opportunities through the Mayor's programmes. 	Continue as usual Or Identify key sectors within the low carbon economy that Londoners need to develop skills in and support them to do so. Or Helping Londoners to participate in the low carbon economy. Or The Mayor, through the London Development Agency and working with partners, will help create the conditions that ensure London's businesses are able to access market opportunities in the low carbon economy and Londoners are adequately skilled to compete effectively for the jobs created in the sector. Or The Mayor, working with partners and through the London Development Agency, will encourage the creation of jobs in the new low carbon economy, and ensure that Londoners are adequately skilled to fill the jobs. Or Develop Londoners' skills and experience in high carbon sectors to ensure that Londoners are able to access high carbon economic opportunities.	The skill sets that will be required to make the transition will be wide-ranging, so they need to be identified and mechanisms developed to impart these skills to people.

Proposed Policy	Proposals	Summary of alternative policies considered? (if yes give details)	Summary rationale for decision
Policy 3 – Enabling the identification and development of decentralised energy opportunities and building capacity to deliver decentralised energy projects.	Proposals include: <ul style="list-style-type: none"> – continually updating the London Heat Map – undertaking a detailed assessment of London's low and zero carbon energy resources – supporting London boroughs to produce local heat maps and energy masterplans 	These 3 policies commit the Mayor, with partners, to delivering a target of 25 per cent of London's energy supply from decentralised sources by 2025. Alternative policies included: <ul style="list-style-type: none"> – Removing the 25 per cent target – Increasing the 25 per cent target – Focus planning and implementation on the delivery of onsite renewables. 	Total CO ₂ emissions from electricity use = 22.5 MtCO ₂ in 2008 (51% of London's total CO ₂ emissions) Total CO ₂ emissions from energy supply, including heating = 36.05 MtCO ₂ (81% of London's total CO ₂ emissions). Therefore, tackling CO ₂ emissions from energy supply can bring substantial CO ₂ emissions reductions. London's high building densities are for the most part well suited to the deployment of decentralised energy systems and their development will provide cost effective carbon savings versus alternative options. A 2008 London First study on delivering decentralised energy in London concluded that the potential capacity for decentralised energy in London could be 30 TWh per year.
Policy 4 – Delivering decentralised energy through the planning system	Proposals include: <ul style="list-style-type: none"> – all new development will, wherever possible, either support the expansion of existing decentralised energy systems or include new systems on-site. 		

Proposed Policy	Proposals	Summary of alternative policies considered? (if yes give details)	Summary rationale for decision
Policy 5 – Enabling the commercialisation of the decentralised energy market to deliver decentralised energy on a wide scale in London	Proposals include: The wide range of opportunities for decentralised energy schemes in London will be identified and developed by the GLA group, London boroughs and the private sector. The focus will be exemplar decentralised energy projects and the provision to boroughs and developers of the tools to identify decentralised energy opportunities and the support to deliver them. To facilitate the move towards zero carbon energy supply programmes the Mayor will encourage renewable energy projects.		
Policy 6 – Retrofitting existing homes with energy efficiency measures, along with low and zero carbon energy generating technologies, to reduce their CO ₂ emissions.	The Mayor will work to provide London wide retrofitting of whole-house energy saving measures in existing homes, and encourage London's households to change the way they think about and use energy at home. The Mayor will also create mechanisms to allow Londoners to install more expensive measures such as renewables in their homes. This will be delivered through the RE:NEW. Proposals include: <ul style="list-style-type: none"> – Working with boroughs, energy suppliers, government and partners, to install easy energy efficiency measures into 1.2 million homes and loft and cavity wall insulation into those where appropriate by 2015 – Maximising uptake of more expensive energy efficiency and renewables measures – Developing effective community based approaches to delivering home energy efficiency measures 	Continuation of London Homes Concierge Service, Or Reliance on existing government schemes and measures.	<ul style="list-style-type: none"> – London's homes (buildings) are responsible for 15.73 MtCO₂ - 36% of London's CO₂ emissions in 2008. – Previous scheme to reduce CO₂ emissions from households was the Homes Concierge Service. This was only taken-up by a relatively small number of households and resulted in a reduction in CO₂ emission of 723 tonnes. – The whole-house approach has been proven to be effective in previous pilots eg Kirklees. – London receives less than its equitable share of national funding for homes energy efficiency. For example, a London Assembly report found London receives only 4.5% of CERT funding, compared with having 12% of the UK population. A large scale programme can therefore lever in this funding.

Proposed Policy	Proposals	Summary of alternative policies considered? (if yes give details)	Summary rationale for decision
Policy 7 – Tackling fuel poverty in London	<p>The Mayor will work to minimise fuel poverty in London through the focused delivery of appropriate climate change mitigation and energy programmes:</p> <ul style="list-style-type: none"> – RE:NEW – includes benefits checks as part of energy audits, therefore increasing uptake of Warm Front funding – Call on energy suppliers to implement social tariffs – Promote the living wage and increase affordable housing provision 	Continue as before	By making homes more energy efficient, it will reduce fuel bills and therefore contribute towards reducing fuel poverty.
Policy 8 – Minimising CO ₂ emissions from London's existing workplaces	<p>The Mayor, working with the LDA and other partners, will support organisations to reduce CO₂ emissions from their existing buildings by retrofitting them with energy efficiency measures, building the knowledge and capacity of workplaces to use energy more efficiently, and sharing best practice. This will be delivered through:</p> <ul style="list-style-type: none"> – RE:FIT – The Green500 and successor schemes – The Better Buildings Partnership 	<p>Continuation of Green500 in current form or</p> <p>Extending help to SMEs or</p> <p>Working with other organisations, e.g. the Carbon Trust. Or</p> <p>Rely on national schemes for retrofitting public buildings.</p>	<p>London's workplaces responsible for 19.17 MtCO₂ in 2008 (43% of London's CO₂ emissions)</p> <p>A number of barriers were identified to the public sector implementing energy efficiency measures. As they are responsible for 30% of energy consumption in the service sector it presents a good opportunity for reducing CO₂ emissions. Continuing without RE:FIT would have missed this.</p> <p>A number of smaller organisations do not have the capacity to reduce their own CO₂ emissions, so further support was required. Continuing with the Green500 as was, would have missed this.</p>
Policy 9 – Minimising CO ₂ emissions and energy use from London's new buildings	Implementing climate change policies set out in the draft replacement London Plan, developing additional guidance and best practice support, and working to deliver exemplar new build	<p>Continuation of previous London Plan targets:</p> <ul style="list-style-type: none"> – 20% of energy supplied by renewables for new development 	<ul style="list-style-type: none"> – The overall targets for CO₂ reduction present a more holistic response to CO₂ emissions from new build and support the implementation of the mayor's energy

Proposed Policy	Proposals	Summary of alternative policies considered? (if yes give details)	Summary rationale for decision
	<p>projects, specifically:</p> <ul style="list-style-type: none"> – Making all new residential new build zero-carbon from 2016, with an improvement on 2006 building regs of 44% from 2010 and 55% from 2013 – Making all non-residential new build zero-carbon from 2019, with an improvement on 2006 buildings regs of 44% from 2010, 55% from 2013, and as per new building regulations from 2016. – Applying the Mayor's energy hierarchy: Be lean, be clean, be green. 	<ul style="list-style-type: none"> – Go no further than building regulations 	<p>hierarchy.</p> <ul style="list-style-type: none"> – The targets align to (and are more challenging than) nationwide UK targets – The previous target led to distortion of the energy hierarchy, with renewable energy placed higher than 'being clean'. – The LSBU report (see next column), supported the target levels set.
Policy 10 - Minimising CO ₂ emissions through a shift to more efficient modes of transport	Reducing the need to travel where possible and encouraging people to switch to public transport, walking and cycling; and encouraging freight to switch from road to rail and water.	As per Mayor's transport strategy	<p>As per Mayor's transport strategy</p> <p>Transport responsible for 9.61 Mt CO₂ (21% of London's CO₂ emissions) in 2008.</p>
Policy 11 - Minimising CO ₂ emissions through more efficient operation of transport	Improving driving technique on public transport, raising awareness of fuel efficient driving styles, and smoothing traffic flows.		
Policy 12 - Minimising CO ₂ emissions from transport through the use of low carbon vehicles, technologies and fuels	Supporting and encouraging the uptake of low emission vehicles, reducing the use of energy by transport infrastructure, and supporting the use of sustainable biofuels.		
Policy 13 - Setting challenging targets and measuring and publicly reporting CO ₂ emissions	Setting interim targets to reduce CO ₂ emissions, reporting progress against targets, and identifying further opportunities for CO ₂ reduction.	Continue as before.	Research shows that households and SMEs are more likely to take up energy efficiency measures if government takes a lead.

Proposed Policy	Proposals	Summary of alternative policies considered? (if yes give details)	Summary rationale for decision
Policy 14 – Reducing energy use and CO ₂ emissions from GLA group buildings	Retrofitting existing buildings with energy efficiency measures, minimising the energy use in new buildings, and utilising decentralised energy.		
Policy 15 - Driving down CO ₂ emissions from transport in the GLA group	Driving fleet vehicles in fuel efficient ways, and procuring low CO ₂ emitting vehicles into the GLA group fleet.		
Policy 16 - Demonstrating what can be achieved through demanding low carbon goods and services	Procuring low carbon products and services, working through the GLA group's responsible procurement policy, and using the GLA group's procurement as a model to the wider public sector.		
Policy 17 – Measuring London's CO ₂ emissions	Develop and maintain an up-to-date emissions inventory covering London's direct and indirect CO ₂ emissions.	Continuing to measure CO ₂ emissions with an up to three-year time lag Or Continuing to not measure London's indirect CO ₂ emissions	The time lag makes it difficult for the Mayor to assess the impact of programmes. Measuring indirect emissions will give London a more complete picture of its CO ₂ emissions and understand if and where further CO ₂ savings could be made in the future.