LONDONASSEMBLY
Environment Committee

City Hall
The Queen's Walk
London SE1 2AA
Switchboard: 020 7983 4000
Minicom: 020 7983 4458
Web: www.london.gov.uk

Sadiq Khan
Mayor of London
City Hall
(Sent via email)

3 February 2017

Dear Mayor,

Environmental priorities for your administration

Since the May election, the Environment Committee has taken evidence on the environmental challenges and priorities facing your administration. We have heard from external stakeholders and experts in June, from your Deputy Mayor for Transport in September, and from your Deputy Mayor for Environment and Energy soon after her appointment in October. Our thanks go to all those who contributed to this process.

We would now like to draw to your attention some issues that have emerged from these meetings, and the Environment Committee's previous work. These issues may be tackled not just in your forthcoming Environment Strategy, but in the Transport Strategy, the Economic Development Plan, the London Plan, future editions of the Infrastructure Plan, and other policies, programmes and strategy documents.

This letter summarises our main points. Further details are outlined in the attached Appendix.

Air pollution
This is London's major and ongoing public health challenge.[1] We welcome your focus on achieving NO_2 compliance as soon as possible and the majority of the committee welcomes the measures you have proposed to achieve this. You have our response to your first two consultations, which suggest some ways in which the proposals could be improved in detail, to maximise benefits to Londoners.[2]

We note that compliance with $PM_{2.5}$ limit values is also a minimum requirement and that reducing pollution below the limit values reduces the harm to health proportionately, so your strategy should pursue these goals too.

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[1] The UKIP Group notes that air pollution is one among a number of public health challenges facing London.
[2] As noted in previous Committee work, the GLA Conservative Group does not support the Mayor's proposed T-Charge or expansion of the Ultra Low Emission Zone (ULEZ), and considers them to be ineffective and punitive measures.
The Green Group, while supporting the ULEZ as an improvement on the existing situation and also endorsing the improvements to the ULEZ, has proposed in its own response to the most recent consultation that it would be better still to have a more sophisticated form of road charging related to distance driven as well as vehicle type.
The UKIP Group also does not support the T-charge as it is projected to have little effect on air pollution levels, neither does it support the implementation of a ULEZ involving road pricing due to the damaging implications to privacy and civil liberties.

Telephone contact: 020 7983 6541 **Email contact:** ian.williamson@london.gov.uk

Carbon emissions and energy use

The majority of the Committee see an urgent need to achieve faster progress in reducing carbon emissions across London and welcome the priority you place on this goal. We will be producing a report shortly on domestic energy and fuel poverty, and will make more specific recommendations there. With the budget process ongoing in the meantime, we note that it is hard to imagine the necessary difference being made to delivery work in energy use reduction, if programme budgets were to continue to reduce.

Looking more towards the long term, and as you review the work done under your predecessor to develop options for London's energy future, please note that it is likely that only the 'low demand' scenarios in the London Energy Plan are compatible with the goal set under the previous Mayoralty of reducing emissions by 80 per cent by 2050. As you begin work towards your zero carbon city goal, and in the context of the more stretching 1.5 degree goal agreed in Paris, you will need to regard these low demand scenarios as a baseline and seek to lay the groundwork for further reductions. There are potential business opportunities in transitioning to a low carbon economy, and your economic strategy should be fully engaged in positioning London to benefit from them. The majority of the committee consider that there is a significant funding opportunity in heat networks, so you should be promoting these and helping to find ways for developers to include them, while ensuring that the infrastructure is such that any gas-fired heat plants can be replaced by renewable sources as soon and as easily as possible.

You should also consider your energy and air quality strategies together, and consider carefully the number, scale and location of combustion-based decentralised energy plants from an air pollution perspective.[3]

Waste management, recycling and the circular economy

As I know you are aware, there are also great business opportunities in the transition to a circular economy, and this should be at the heart of your economic strategy. This strategy should support the development of circular economy services such as re-use, repair and the design, innovation, business service and financial underpinnings of a low-waste sharing economy.

While the economy is still generating significant streams of waste, there is an urgent need for your waste strategy to minimise incineration as well as landfill and to break out of the recent stagnation in recycling rates. Therefore we welcome the prospect that meeting recycling and waste reduction targets should remove the need for further incinerator approvals. To further support recycling, you should work with local authorities and others to explore the potential for more consistency across London in what recyclable and organic waste is collected and how it is separated. London as a whole can and must do better on food waste minimisation and collection.

Water management

London has an urgent need to reduce the risk of surface water flooding causing widespread property damage and likely loss of life in the event of a severe rainstorm. Policies to tackle this

[3] The Green Group does not support energy from waste incineration, and only supports advanced thermal treatment of residual waste (the element of the waste stream that is not recyclable or compostable).

risk have been developed over the last few years, and need effective implementation by your administration.

You should now develop policies to tackle another severe weather risk, of drought and the pressure on London's water supply as the population grows. We are aware that you are working with Thames Water and others; this work should be progressed urgently and integrated into your Environment Strategy and the development of the Infrastructure Plan.

Integrated water management offers the best hope for a sustainable water future for a large city like London. This approach was taken up to some extent by your predecessor in his non-statutory Water Strategy, and should be developed further and built into your Environment Strategy.

The green environment

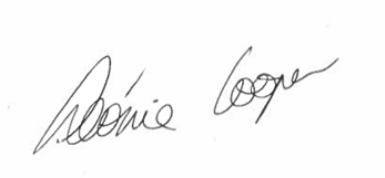
We have noted your welcome commitment to London's green infrastructure, which provides the city with great benefits, and could do with more strategic and innovative management. We are currently undertaking an investigation into the management of public green spaces and will make recommendations in the spring.

More generally, we commend the strategic approach to green spaces and the appreciation of their many benefits shown by the All-London Green Grid and the report of the Green Infrastructure Task Force. We would wish to see you build these approaches into your Environment Strategy and deliver on them during your term of office.

I would be grateful to receive a reply to this letter, outlining in broad terms how your administration will respond to the issues raised and directing us to the strategies or other documents containing specific actions and proposals. It would be useful if you could copy your reply electronically to the Committee's Scrutiny Manager, Ian Williamson, on ian.williamson@london.gov.uk.

Thank you very much for your, and your Deputies' and staff's, contribution to the work of the Committee. We look forward to continuing a constructive relationship with your administration over the forthcoming years.

Yours sincerely,



Léonie Cooper AM
Chair of the Environment Committee

Appendix: Environmental challenges and priorities for the 2016-20 administration

Air pollution

Air pollution is London's major and ongoing public health challenge. Illegal levels of nitrogen dioxide (NO_2) pollution affect 328,000 London children at school and 3.8 million London workers at their workplaces on a daily basis. This long term exposure is responsible for over 9,000 extra deaths a year in London, making it an environmental hazard second only to smoking, ahead of alcohol, obesity and accidents.

We very much welcome the appreciation you have demonstrated of the need for urgent action to comply with the NO_2 limit values and the priority you have placed on this. The majority of the committee welcomes your proposals for a number of air pollution actions, including improvements to the Ultra Low Emission Zone in line with recommendations made by this Committee in the previous term.[4]

We note that **compliance with $PM_{2.5}$ limit values is also a minimum requirement**, and that any reduction in air pollution has proportional benefits to public health, so **your strategy should continue to pursue pollution reduction beyond the limit values**, wherever people are exposed to it.

Transport emissions are a significant contributor to pollution levels, and you are right to target diesel vehicles as the major element of this. We are broadly supportive of efforts to accelerate London's move to ultra-low and zero emission vehicles, while controlling traffic congestion and ensuring compliance costs for drivers and operators are proportionate to the public health benefits. The majority of the committee has detailed its proposals for **stronger action** to maximise benefits to Londoners in our response to your 2016 consultations. More generally, we have an extensive body of previous work on air quality.

As exhaust emissions are reduced, brake and tyre wear particles will form an increasing proportion of transport emissions of particulate matter (PM). These emissions are related to vehicle numbers and driving patterns, regardless of engine technology, and so will need to be tackled by walking, cycling, freight consolidation and other traffic reduction measures as well as cleaner engines. The majority of the committee welcomes the inclusion of traffic reduction as a principle of your transport policy in your a City for All Londoners document.

We support your calls for much stronger action at the national level, noting that the Government has received a second judgement against it, this time in the High Court, over whether its air quality plan is adequate to comply with UK law.

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[4] As noted in previous Committee work, the GLA Conservative Group does not support the Mayor's proposed T-Charge or expansion of the Ultra Low Emission Zone (ULEZ), and considers them to be ineffective and punitive measures.
The Green Group, while supporting the ULEZ as an improvement on the existing situation and also endorsing the improvements to the ULEZ, has proposed in its own response to the most recent consultation that it would be better still to have a more sophisticated form of road charging related to distance driven as well as vehicle type.
The UKIP Group also does not support the T-charge as it is projected to have little effect on air pollution levels, neither does it support the implementation of a ULEZ involving road pricing due to the damaging implications to privacy and civil liberties.

Non-transport emissions are also significant. Domestic gas use for heating and cooking is a significant contributor to NO_2 levels inside homes and in residential areas generally – measures to reduce gas use in homes are covered in the section below on carbon emissions. Other domestic fuels such as wood burners and log fires, which produce particulates especially, are becoming more popular in recent years despite the restrictions on solid fuels brought in to control London smog; you should monitor their contribution to pollution in residential areas and seek to secure enforcement of existing regulations if necessary. We welcome the aim expressed in your document A City for All Londoners that all new buildings should be 'air quality positive' and will look with interest to see how this is defined and implemented.

We support your lobbying of central government for action on air pollution, including a statutory right to clean air, a local authority competence to tackle emission sources, reform of Vehicle Excise Duty, a diesel scrappage scheme and maintenance of pollutant concentration limit values. We will write to the Government to express this support.

Carbon emissions and energy use

The GLA's existing strategy has a trajectory for reducing carbon emissions by 60 per cent by 2025, but current emissions are running above that trajectory. We welcome your stated goal of a zero carbon city by 2050, as part of the global effort to limit climate change. This goal (and even more so new goals such as limiting climate change to a 1.5 degree warming, which we were pleased to hear your Deputy Mayor for Environment and Energy acknowledge at our meeting) implies a trajectory, even in the near term, at least as steep as that set by your predecessor. **There is therefore an urgent need to achieve faster progress in reducing carbon emissions across London.**

You have arrived in office to find a London Energy Plan (LEP), setting out different scenarios for London's energy future, developed by the GLA under your predecessor. We looked at the LEP with great interest and wish to emphasise that only the 'low demand' scenarios in it are likely to be compatible with the existing goal of 80 per cent carbon reduction by 2050. **These scenarios (rather than the medium or high demand scenarios in the LEP) will need to be a baseline for your administration's long term planning for further work to achieve a zero carbon city by that date.** We further note that the 'low demand' scenarios do not match the earlier Infrastructure Plan, which envisaged an overall growth in energy use across London to 2050. The implications for the Infrastructure Plan of falling overall energy use will be deep and wide-ranging, requiring different balances between energy and other sectors, between energy efficiency, conventional generation, low-carbon generation and distribution, and in other energy-critical forms of infrastructure such as transport and communications, with knock-on effects for economic strategy, spatial planning and others. Particular long-term challenges that have been highlighted in our recent discussions are the need to radically reduce emissions from transport (through some combination of travel reduction, active travel and low-carbon vehicle technology) and heating (which will require a very large shift away from natural gas, as well as efficiency improvements). As with the circular economy, there are great business opportunities in these deep changes, and **your economic strategy should be fully engaged in positioning London to benefit from them**.

One of the key sectors for carbon reductions is the domestic sector; as well as carbon emissions, this is also a way to help Londoners with their energy bills, and especially vulnerable Londoners at

risk of fuel poverty. We will be making recommendations early in 2017 about how to revive progress here and hope to feed into the development of your Environment Strategy. The 'Energy for Londoners' proposal may be an important vehicle for new policies, even potentially an alternative to the national Green Deal scheme, but **it is hard to imagine the necessary difference being made while continuing to reduce environmental programme budgets**.

Our forthcoming report is also likely to emphasise the role of the community energy sector. **We welcome your recent support for the nascent Community Energy London and encourage you to build on this. We also welcome your manifesto commitment to a solar energy strategy, and encourage you to look closely at our report *Bring Me Sunshine* as you prepare this.**[5]

At larger scales of energy generation, there is also a need to secure investment from the national pot for district heating, by ensuring that there are marketable opportunities for projects. Large-scale building of homes and mixed developments as London grows offers a great opportunity; **your staff should be promoting heat networks to developers and helping them to find ways to build them in**. In doing this, please remember that the value of district heating is as a way to distribute low-carbon heat, and so **near-term projects fuelled by gas, municipal waste or other carbon-emitting sources should be built for conversion later (or ideally sooner) to low-carbon sources such as heat pumps, or biogas from sewage or food waste**.

You should also consider your air quality and energy strategies together. Energy efficiency in buildings offers great scope to reduce NO_X and PM emissions, as well as those of CO_2. On the other hand, combustion-based energy generation within London (including biogas and energy from waste) is likely to generate NO_X and PM emissions, adding to the air pollution problem. **The number, scale and location of such decentralised plants should be carefully considered from an air pollution perspective.**

As well as keeping buildings warm, there are also well-being as well as carbon emissions implications of keeping them cool. London's climate is expected to warm, and with increased seasonality and variability there are particularly expected to be more severe heatwaves. By the 2060s, it is expected that temperatures like the record-breaking 2003 heatwave will become normal, with England seeing temperatures of 38 degrees or more one year in two on average. Just like extreme cold, extreme heat can be hazardous to health and many of London's homes are poorly designed from the point of view of maintaining a comfortable temperature. **Action is needed to ensure that London homes use sustainable cooling.** It is important that Londoners are not driven to resort to powered air conditioning, which emits not only CO_2 but also heat to the outside environment, making the overheating problem worse for the rest of the neighbourhood. We look forward to seeing your seven-point overheating plan.

As a short-term point on carbon emissions, we note that there has not been an annual progress report since summer 2015 on the existing Climate Change Mitigation and Energy Strategy, and that the latest round of data in the London Emissions and Greenhouse Gas Inventory (LEGGI) was released later in the year than usual. **We encourage full publication of available data so that**

[5] https://www.london.gov.uk/about-us/london-assembly/london-assembly-publications/bring-me-sunshine-how-londons-homes-could

London can be aware of its progress on carbon emissions and so that the Assembly and external experts can participate in discussions about energy and carbon reduction policy. The Committee will obviously be conscious of the change-over in Mayoral administrations when interpreting and making any comment on the data.

Waste management, recycling and the circular economy

The throwaway, linear economy is unsustainable; it wastes energy and materials at great financial and environmental cost. A sustainable economy will be 'circular' – minimising the demand for new materials, minimising waste disposal, and getting maximum value out of materials by re-using and recycling them many times at the minimum financial and environmental cost.

The primary goals of your economic strategy should include both rapidly making the transition to a circular economy and helping London's businesses to position themselves to profit from it. The London Waste and Recycling Board (LWARB), working with WRAP and the London Sustainable Development Commission under your predecessor, produced a report setting out how a circular economy transformation could create a net increase of 12,000 jobs in London. LWARB also identified enabling sectors in which London already has strengths, such as business services, the digital sector, government, media and academia. We commend this work and the Deputy Mayor's support for it, and look forward to seeing the next iteration of the circular economy route map shortly.

In general, economic opportunities can be found in making materials streams available as a resource rather than leaving them as a disposal problem. Waste disposal – landfill and incineration – loses or destroys the value in materials. Incineration can extract a certain energy value, but for many common materials such as paper and plastics, this value is less than the cost of replacing the materials with new and can be offset by the immediate carbon emissions, so recycling is a better option. **Your waste strategy should focus on minimising incineration as well as on minimising landfill.** We were heartened to hear from your officers that, if recycling and waste reduction targets are met, no new incinerator capacity should need approval. [6]

Used products often still have value in their existing shape, and that value can best be retained by directing the products to re-use, repair or remanufacture. **Your economic strategy should support the development of these services and the market for them.**

While these services remain undeveloped, and for certain types of waste material in the long term, waste materials should largely be recycled, requiring separation into their different material types. **Your waste strategy should seek to encourage and support this, potentially initiating a process to bring together stakeholders to develop a route map to standardised municipal waste collections across London.** We welcome your Deputy Mayor for Environment and Energy's openness to this discussion, which is in line with the recommendations of this Committee's recent Growing Growing Gone report, and her understanding of the need to work with local authorities.

[6] The Green Group does not support energy from waste incineration, and only supports advanced thermal treatment of residual waste (the element of the waste stream that is not recyclable or compostable).

Household recycling rates in some parts of London are among the worst in the UK, and are poor compared to many other major cities worldwide. Your target is for London to recycle 50 per cent of municipal waste by 2020. There is wide variation in performance across London, with the average rate remaining at around 33 or 34 per cent. **It should be an immediate goal of your waste strategy to seek sustained improvement in areas of poor performance.** This should not detract from the longer-term strategic goal of transitioning to the circular economy, in which bulk recycling is a residual option behind re-use, repair and remanufacture.

This Committee has previously found that **anaerobic digestion (AD) is the most sustainable way of dealing with organic waste, and your strategy should reflect this**. Collection systems to stop organic waste contaminating dry recycling and bring it to AD should be explored. One option may be in-sink disposal, but there are practical questions to explore with Thames Water and other partners; doorstep collection or local deposit points may remain the best option.

Reducing waste is at the top of the waste hierarchy and **your strategy should include work with companies that have influence in the supply chain over avoidable waste such as packaging** – for example supermarkets and other major retailers and distributors. Food waste is another form of avoidable waste that can be tackled with both industry and consumers.

Water management

London faces issues both with supplying water and with managing waste and excess water.

Excess water includes sewage waste and also rainwater. Urban areas have particular issues with rainwater because large areas of paved surfaces prevent rainwater from soaking into the ground where it falls. Heavy rain can rapidly overwhelm local drainage systems; this Committee has found that heavy rainfall over London, such as that affecting other parts of southern England in the 2007 storms, would be expected to cause tens of billions of pounds worth of property damage and likely loss of life. Because much of London's rainwater drainage uses the same sewers as foul water disposal, even moderate rainfall can lead to untreated sewage overflowing into the river Thames. The Thames Tideway Tunnel will help to reduce combined sewer overflows, but a more sustainable long-term approach is to invest in sustainable drainage and methods of keeping rainwater out of the sewers.

Good progress has been made in recent years in developing policies to reduce the likely harm from excess rainfall – the Drain London programme and the Sustainable Drainage Action Plan. **These policies should be effectively implemented.** We were pleased to hear that there will be a dedicated officer to support implementation of the Sustainable Drainage Action Plan.

Your administration should now turn attention to water supply. Thames Water told us that the risk of drought has been under-estimated, both in likelihood and impact. The region has suffered severe droughts in the 19th century, with several successive dry years, and the frequency of two-dry-year droughts and the narrow escape in the very wet summer of 2012 confirms that a drought of three or more dry years is within the range of likelihood that London should be planning for. But we heard from Thames Water that emergency drought measures would include dramatically lowering mains water pressure to conserve water for cooking and hygiene. This could affect and potentially disrupt fire safety systems on the London Underground, computer cooling systems in offices, lavatory facilities in high-rise buildings, hotel laundries, and other support services. Major

parts of London's infrastructure and economy could be severely hampered or even shut down, with an estimated economic impact of hundreds of millions of pounds per day, for at least four to six weeks.

The pressure on London's water supply is increasing considerably with population growth, which has been more rapid than was envisaged at the last round of water strategy planning. We are aware that you are working with Thames Water and others on water supply strategy; **this work should be progressed urgently and integrated into your Environment Strategy and further work on the Infrastructure Plan.**

There are long-term opportunities in integrating water management strategy across both water supply and the management of excess water. For example, rainwater harvesting can reduce both rainwater runoff and the demand for mains water. We have heard that there are now integrated water management plans for certain developments, such as Vauxhall Nine Elms and Battersea, Old Oak and Park Royal, and Charlton Riverside. **This approach should be adopted widely across London, and the London-wide integrated water management approach begun in the previous administration's Water Strategy should be developed and included in your Environment Strategy.**

The green environment

The benefits of green infrastructure are many, including keeping the city cool and shady, which will become increasingly important as the climate warms and summer heatwaves become more severe. It can also help to reduce flood risk if designed to let rainwater soak into the ground or re-evaporate, and to retain excess water on-site rather than releasing downstream.

Londoners benefit greatly from having access to green spaces and to nature, for their psychological well-being, physical health and learning. There is also a value in London's biodiversity, and green spaces provide important habitats, as do brownfield sites and certain buildings. We welcome your administration's intention to recognise these benefits and use them to help ensure that green spaces are appropriately managed and resourced.

There is a need to manage the tension between the building necessary to accommodate London's growth and the preservation of London's remaining green spaces. However, it is not just the amount of green space that is important; it is where the green space is and how it is managed to provide environmental services. We have heard calls for leadership from your office and for coherent strategy. We broadly support the approach that has been developing in City Hall over previous administrations in the All London Green Grid and the report of the Green Infrastructure Task Force and we welcome your commitment to green infrastructure. **The strategic planning of green spaces as a London-wide network, the valuing of green infrastructure for the benefits it can provide, and its management to maximise those benefits, are important areas of work that should be built into your Environment Strategy and delivered during your term of office.**

This more value-oriented management is not made easier by reductions in public budgets. We are currently undertaking an investigation into the management of green space, considering some new management and funding models that are being developed across London and elsewhere. We plan to report in the spring.