

## London Assembly response to the Draft London Environment Strategy November 2017

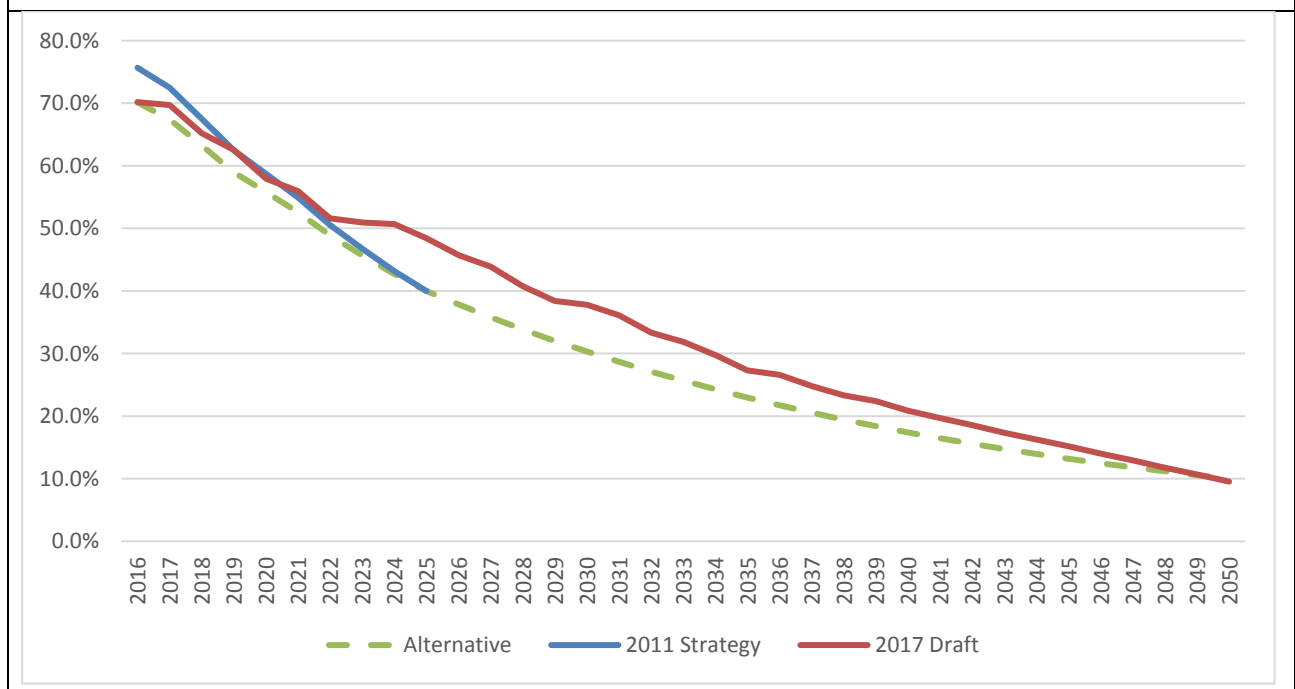
This is the London Assembly's response to the Mayor's Draft Environment Strategy. It has been agreed by the Environment Committee following the publication of the draft strategy in August 2017 and meetings with the Deputy Mayor for Environment and Energy in September and October 2017, and also drawing on work by the committee throughout the current mayoralty and before.

### Carbon reduction

We welcome the increased ambition to 2050. The current Mayor is aiming for a 90 per cent reduction in emissions, with offsetting and carbon capture to reach 'zero carbon', compared to the previous strategy's 80 per cent reduction target by the same date.

However, we note that there is a decreased ambition to 2025 – an expected reduction of only around 52 per cent, compared to the explicit 60 per cent target set by previous Mayors. Combine this with the fact that estimated emissions for 2016 are lower than expected in the previous strategy, and it is clear that slower reductions are expected in the 2016–2025 period than under the previous plan. Our concern is that relaxing the 60 per cent target to a 52 per cent expectation implies that an estimated 17 million tonnes of extra carbon could be emitted between 2016 and 2025, and a further 46 million tonnes of extra carbon by 2050, compared to an alternative carbon reduction trajectory with the same start and end points but still meeting the 60 per cent target for 2025.

**Carbon reduction ambition in 2011 strategy and 2017 draft, plus alternative trajectory retaining 60 per cent 2025 waypoint**  
(Percentage of 1990 baseline emissions)



We recognise the need for realism in programme delivery expectations. We welcome new programme delivery measures and potential measures, such as revolving loans, the Energy Leap pilot, and the London Energy Efficiency Fund. With some further delivery resources and

reduced ambition, the Mayor is less likely to miss his new targets, and less dependent on national action<sup>1</sup> or market trends to hit them.

However, it would be preferable to have faster carbon reductions at an earlier stage than those planned for. We recommend:

- continued efforts to push for stronger national government action
- looking for innovations in carbon reduction
- seeking resources to accelerate London programme delivery
- making a strong business case for rolling out the Energy Leap approach (or any others) if proven to work cost-effectively
- treating the planned carbon savings as a minimum – and pushing beyond them if possible

There is still relatively little detail on carbon reduction measures after 2025. Since, compared to the previous strategy, emissions in 2025 are expected to be higher, the ambition for 2050 is greater, and the period is much closer, the questions over how these further reductions will be achieved are therefore bigger and more urgent.

We look forward to innovative proposals for the white-label Energy for Londoners, which we hope will be a first step on the path towards a fully-licensed GLA energy company; we therefore recommend that preparations continue for the fully-licensed GLA company and that shorter-term arrangements do not jeopardise that in any way.<sup>2</sup>

We welcome the support that there is for decentralised energy, such as support for business cases for community solar, and the Decentralised Energy Enabling Project.

The Mayor needs to deliver on his manifesto commitment to back district heating schemes powered by waste heat from the Tube – in the draft strategy this is supported in principle but no additional project is yet identified. We recommend that work is done, in conjunction with boroughs, to ensure any district heating schemes include comprehensive monitoring to ensure customers only pay for heat used, thus maximising fuel poverty reduction. This should include legacy systems, many of which are inefficient.<sup>3</sup>

We welcome the solar action plan, a policy that we recommended. However, the target for Mayoral delivery is only about 100 megawatts of additional installed capacity by 2030, which would not bring London even up to the capacity that other UK regions already have installed. The Mayor identifies the need for about ten times more – 1 gigawatt of solar capacity across London by 2030. There needs to be more work to identify how this capacity may be created across London's economy and what enabling action is needed to ensure that it is. We look forward to further work on the potential for solar on TfL land and on a reverse auction for

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<sup>1</sup> Regarding national action, the UKIP Group does not think that power generation for the UK grid should be based on wood pellets, on the grounds that wood pellet production is destructive to forests.

<sup>2</sup> The UKIP Group does not support the Mayor dabbling in the energy market, on the grounds that a Mayoral energy supplier would be far too small to have any impact in the market and would simply transfer money from council tax payers to energy consultants.

The Green Group supports a fully licensed Mayoral energy supply company. A white label option would allow the Mayor to tackle fuel poverty but would not deliver the benefits of a fully licenced option which would bring faster de-carbonisation of the energy sector, tackle fuel poverty, grow London's energy sector and provide new jobs in London.

<sup>3</sup> The UKIP Group only supports district heating schemes which do not require a subsidy and where customers will not be tied into higher than market prices for energy. The UKIP Group says that schemes like Opportunity Sutton must adhere to these two principles.

retrofitting domestic solar, plus detailed mapping done in conjunction with the boroughs to ensure we move towards the 1 gigawatt the Strategy identifies.

We also welcome the Mayor's proposals for climate positive buildings that generate more clean energy than they consume. The Mayor should pilot this urgently: if proven, it could be a standard for large scale future developments in London.

We welcome the Mayor's proposals on domestic energy efficiency and fuel poverty (which include a number recommended by this committee). The pace and scale of delivery will be crucial in accelerating carbon reductions. We agree with the Mayor's calls for an effective national strategy for domestic energy efficiency, providing much greater support to local and regional action. Whether national or local, domestic retrofit schemes should learn from the Green Deal's experience and offer zero or low interest loan rates and be user friendly, to maximise public uptake and therefore emissions reductions.

There is still an expectation that workplaces will deliver a greater-than-proportional share of carbon reductions, compared to homes or transport, but there is still little specific work proposed to extend the GLA's public sector workplace retrofit programmes to the private sector. We recommend that there is clarification in the final strategy of how the expected workplace carbon reductions will be delivered.

GLA thinking seems to be at a very early stage on the potential for Licence Lite to support domestic and other micro-scale electricity generation, for example from solar panels, and we recommend further feasibility work on this.

## **Waste**

We welcome the renewed focus on improving recycling rates and the targets for local authority collected waste and the broader municipal waste.

We welcome the emphasis on the circular economy. There is relatively little practical detail at this stage on aspects of it such as reducing the demand for virgin materials, re-use and repair and re-manufacture, but there is to be work done to develop these and we look forward to the results. We welcome that there is resource to support circular economy businesses (Circular London Programme, London SME Fund, Mayor's Entrepreneur Programme).

We welcome the response to committee recommendations such as on disposable packaging, including plastic bottles.

We welcome the Mayor's clarity to boroughs on what they are expected to collect at kerbside, and the emphasis on flats and on innovation in waste management, including joint procurement. We expect to carry out further work on this and probably make recommendations before the publication of the final Environment Strategy. We welcome again that there are resources for local authority recycling collection services (Resource London Programme) and for awareness-raising (Recycle London).

We encourage the Mayor to take advantage of the powers he has to direct local authorities to act in general conformity with his waste strategy – whether by actually using the powers or simply by ensuring that the potential to use the powers secures greater action by boroughs that are under-performing on waste management.<sup>4</sup>

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<sup>4</sup> The Conservative Group does not support the Mayor using his powers of direction. Instead he should work with boroughs to improve recycling. The Conservative Group does not believe that a solution can be found by a one-size-fits-all policy of direction.

The Mayor is posing the right questions, such as how to encourage recycling in flats, and how to make it easier for people to recycle, but these questions have been posed across the waste sector for many years, with a range of solutions proposed, and we encourage the Mayor to identify applicable answers and effectively promote their implementation.

The London Plan will be important for the setting and implementation of recycling policy. We hope to discuss the London Plan in more detail during its consultation window, and potentially make recommendations for its content. Issues may include the strength of recycling targets for local authority collected waste, and policy for recycling provision in flats and other new builds.

The Environment Strategy should aim for all unavoidable food waste to be anaerobically digested.

### **Low-carbon economy**

We welcome that the Mayor sees environmental and economic goals as complementary, and is seeking to integrate resource efficiency, waste reduction, carbon savings and other environmental goals into the Economic Development Strategy. We look forward to the detail to come forward in that draft. We recognise the great potential for London's advanced local services sector to both support and profit from the transition to a low carbon economy, and the creation of a 'cleantech' cluster in and around London.

If the Mayor is not yet able to quantify the effects of environmental policy options on London's economy, then there may be value in commissioning some work to enable this. Quantification of economic effects would assist the construction of business cases and the identification of economically efficient ways to achieve environmental goals.

We agree with the Deputy Mayor that sending a strong signal to businesses about the long-term direction of policy is critical, and clear policies on the low-carbon economy with quantified economic effects would help to generate this signal.

### **Adapting to climate change**

We welcome action to improve climate change adaptation, including reinstating water efficiency to domestic retrofit programmes, and implementing the sustainable drainage action plan.

We also welcome standards for new buildings on keeping cool in extreme heat. However, there could be more on remedying existing buildings that are vulnerable to overheating. We welcome the use of a 'triple jeopardy' risk mapping tool (similar to that first developed by the committee) to identify people most at risk of ill-health from overheating. However, there will need to be action to ensure that these risks are addressed, and monitoring to assess whether the risks are changing and what the outcomes are for people living with the risks. Health, social services, housing and other agencies are involved in managing these risks and their impacts, and they need to work together to find the best and most cost-effective ways of doing so.

We welcome that the Mayor has adopted the principle of adaptive pathways, but more work is needed to develop them specifically in many areas of adaptation. There is still reference to the Thames Estuary 2100 plan as the main exemplar, as there was several years ago.

The risks most in need of mapping are extreme rainfall and resulting flooding, and overheating. Climate change affects both risks, with rainfall thought likely to become more variable and extreme rainfall events more likely, and with temperatures overall expected to rise and to

become more variable. Trends in London's population also need to be factored in, with population growth driving increased building, new drainage inlets and paving over of currently-permeable surfaces, and with an ageing population increasing vulnerability to heat stress. Currently, policy in these areas is along the right lines, but it is not clear how big the future risks are expected to be or what pace of progress is needed. Adaptive pathways mapping could give a much clearer idea of how much needs to be done and by when.

Also, it is not clear why the Mayor has not set quantitative targets for goals like reducing flood risk. We were told that the reason is that delivery is not within the Mayor's control, but the same can be said of carbon emissions. It is within the Mayor's strategic leadership role to set indicative quantitative targets, in consultation with delivery bodies, and we recommend this for reducing flood risk and over-heating.

We welcome work with Thames Water (TW) on water supply and demand, and the emphasis on security and sustainability of supply. Delivery is largely TW's responsibility and we will look at this further in 2018 when TW's draft 80-year Water Resources Management Plan is published.

### **Green infrastructure**

We welcome that there is a target to increase green space, but note that the improvement is not dramatic and is to be achieved gradually (the baseline quoted in the strategy is 47 per cent, and the target is 50 per cent in more than three decades' time). There should be a clear statement of the methodology for counting the figure so that improvements in the number definitely come from greening London rather than shifts in measurement methods.

We are disappointed that the previous administration's 25 per cent tree cover target has been reduced to 22 per cent. There should also be clarity about the baseline for this metric. Tree cover has increased in recent years, and recent studies suggest that 21 per cent may be a more accurate baseline than 20 per cent, which is still quoted in the strategy having been used as the baseline for the strategy of the previous Mayor. The difference between 21 and 22 per cent tree cover is within the expected error of the estimates, and so it may prove hard to be confident that an increase so small has really been achieved.

We recommend the publication, as part of a dashboard of environmental metrics, of regular estimates of the green area and tree cover of London.

A net increase in tree cover will require strong protection of existing trees. We agree that the Mayor needs stronger powers to protect trees and will write to the Government to say so.<sup>5</sup> Also, trees require management and for this, local authorities need expert tree officers, and we recommend support for the network of tree officers to ensure this expertise is pooled and retained.

We welcome the proposal to introduce an urban greening factor, as we recommended, and net biodiversity gain in new developments.

We also welcome the funding that will be available through the Greener City Fund.

We welcome the continuation of the Mayor's manifesto pledge to create green corridors, but note that the expectation seems to be for delivery to be based around opportunities that arise from development proposals, rather than around geographical planning. It seems uncertain

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<sup>5</sup> The Conservative Group does not agree with the Mayor having more powers regarding trees, but instead considers that trees are a matter for local authorities.

whether this will deliver green corridors more effectively than a policy to increase green space without reference to corridors. As the existing All London Green Grid (ALGG) and associated supplementary guidance implementation framework identifies sites geographically, the Mayor should retain this aspect of the ALGG and focus on securing the delivery of identified projects.

It may prove that Healthy Streets (or, in consultation with Londoners in the area, de-motorising streets and converting into parks) will deliver sufficient green infrastructure in linear patterns to provide some corridor effects (as well as a range of other benefits), and we welcome the Healthy Streets approach. We recommend that the design and resourcing of Healthy Streets and other linear green infrastructure programmes should be directed towards delivery of the green corridors commitment. Ideally, there should be a planning exercise to identify where biodiversity corridors are most needed, and for which types of species, to elicit the bringing forward of projects with the greatest biodiversity benefits. The green infrastructure aspect of Healthy Streets will also need sufficient emphasis in the Mayor's Transport Strategy and the London Plan.

We welcome the principle of access to green space and nature, which is being built into the National Park City approach, and also the proposal to create a 'challenge map' showing where there is a need for more access to green space. Promoting the existence of public green space within certain distances of homes is a step towards access, but there are more qualitative aspects of accessibility including the condition of green spaces, the facilities offered there, and the details of design and landscaping, perhaps especially at the edge of green spaces and in the surrounding public areas. There are also other aspects of green infrastructure quality, including the benefits offered in terms of biodiversity, flood protection, urban cooling and other environmental services. We would further welcome clearer plans about how these aspects of quality and accessibility will be delivered.

We welcome the proposal to take forward a natural capital accounting approach, as we have recommended, and to establish a Green Spaces Commission. We recommend monitoring to establish the impact that these have on making business cases and securing resources for green infrastructure.

### **Air pollution**

We broadly welcome the increased focus on reducing air pollution and people's long-term exposure to it, and the improvements that the Mayor has proposed to air pollution policies, which are very much along the lines long recommended by this committee, including earlier implementation of the Ultra-Low Emission Zone, wider expansion of the ULEZ, subsequent creation of a Zero Emission Zone in central London, and strong emissions standards for regulated vehicles such as buses, taxis and PHVs. As we have indicated in consultation responses, we wish to see wider boundaries for the ULEZ expansion for light vehicles, ideally to match the London-wide zone for heavy vehicles and as a minimum to extend coverage in south London to a boundary more equivalent to that in the north. We were not fully reassured by the answers we received to concerns over boundary effects of the ULEZ, especially on the South Circular, a relatively narrow road running immediately alongside residential areas. An increase in car and van traffic on that road will not produce just a proportional increase in car and van emissions: it will increase congestion and so increase emissions per vehicle km for the existing as well as the extra traffic. This effect is likely to be exacerbated because the additional vehicles

using these roads will be older and more polluting vehicles that would incur a charge in the ULEZ.<sup>6</sup>

We also welcome the proposal to adopt as targets the WHO guidelines for PM<sub>2.5</sub> concentrations, which again is in tune with our long-standing emphasis on the health benefits of reducing pollution towards and beyond legal limits as fast as possible. Reducing PM<sub>2.5</sub> emissions further will be challenging, and will require tackling sources such as brake and tyre wear, resuspension and solid fuel burning. Reducing the number of motor vehicles on the roads will be an important part of this, alongside all its other benefits to the environment, health and the urban realm. We will conduct further work on particulate pollution in December 2017, and recommend that GLA officers consider the discussion at that meeting in refining the Environment Strategy.

We support the Mayor's calls for powers over river and construction emissions, and supportive government action such as a new Clean Air Act, VED reform and a national diesel scrappage scheme.<sup>7</sup>

We welcome the direction of travel to a 'zero-emission' transport system, and the resources available for rapid charging points. We will be conducting further work on electric vehicle charging and will make more detailed recommendations following that.

We encourage the Mayor to keep up a dialogue with manufacturers to ensure that zero-emission vehicles are produced for markets that are currently under-served, especially goods vehicles. We also encourage the Mayor to keep up work to facilitate alternative urban goods movement solutions, including bicycles, electric bicycles, zero-emission motorbikes and freight consolidation. These approaches can complement Healthy Streets and other improvements to the urban realm and we encourage the Mayor and the Deputy Mayor for Environment and Energy to keep working across organisational divisions to realise the benefits for London of these future ways of doing business.

When discussing future goods vehicles, we are pleased to note that the Mayor will keep driver sight lines on the agenda as well, and safety for pedestrians, cyclists and other road users.

We encourage the Mayor, in his energy, waste and planning policies, to continue to guard against developments that hinder the achievement of clean air in London and especially in residential areas. There are likely to be particular issues with combustion-based energy sources, and the Mayor's policies on air pollution and on decentralised energy and waste management need to be aligned.

We welcome the increased work on awareness of exposure to pollution, and would encourage that this work moves on to cover exposure that is currently little-known, such as exposure in cars to traffic emissions, and exposure in kitchens and homes from domestic gas burning and wood-burning stoves.

We encourage the Mayor to continue to take a strong and evidence-based position on Heathrow expansion. Since the Government and the Mayor have a duty to reduce exposure to air pollution as quickly as possible they should (even without Heathrow expansion) be

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<sup>6</sup> The Conservative Group does not agree with the earlier implementation or wider expansion of the ULEZ, preferring to keep to the ULEZ size and timings ordered by the previous Mayor. The UKIP Group also does not support a ULEZ expansion for light vehicles to the North and South Circular roads. It would not support the banning of Euro 4, 5 and 6 petrol vehicles, but would support free-market, unsubsidised opportunities for zero emission transport.

<sup>7</sup> The UKIP Group does not support the devolution of VED to London.

implementing pollution control measures and cleaner transport improvements on the heavily-polluted approaches to the airport. Heathrow expansion should be opposed if it worsens pollution compared to this cleaner transport scenario. Cleaner transport measures that are needed anyway should not be included in the expansion scenario and compared to the current high pollution situation, to construct an argument that expansion will not worsen pollution.

### **Ambient noise**

The same logic applies to noise effects. Londoners are already suffering from the noise from Heathrow flights, and so noise reduction efforts are needed and are ongoing. Ongoing and expected noise reduction trends and measures should be part of the non-expansion comparison case, when assessing how much Heathrow expansion is likely to worsen noise exposure.

There are other airports within London's boundaries, with the greatest impact currently coming from London City Airport – these impacts should be shown in the strategy. We call for, and call upon the Mayor also to support, the establishment of an independent noise regulator covering all these airports, able to take into account the noise impacts of them all combined.

We recommend that the Mayor should consider noise issues alongside air pollution considerations in his traffic and transport policies. In particular, shifting goods movements to night times could relieve congestion at peak times and therefore reduce air pollution, but there would need to be measures to ensure that noise from vehicle movements, loading and unloading does not become excessive. Educating and training drivers to use gentle acceleration and minimise braking would have benefits across noise, air pollution, carbon emissions, fuel efficiency and safety.

We welcome consideration of low-noise road surfaces, but if these are not also water-permeable we recommend caution be exercised about the area to be covered in them, perhaps targeting only busy and/or high-speed roads. The larger area of quiet back streets and off-road tarmac should be considered for permeable paving to reduce flood risk.

We have heard striking testimony of the impact of noise and vibration from underground railways, especially the Night Tube, on residents. People are finding their homes uninhabitable because of the disruption to sleep. The draft strategy does not propose new or stronger action on this source of noise, and anticipates the expansion of the Night Tube and its usage. There is an urgent need for TfL to tackle these noise issues effectively, before any further Night Tube expansion occurs.