

# London Environment Strategy

17 November 2017

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## Executive Summary

### About us

Heart of London Business Alliance serves as the voice for 500 businesses and 100 property owners in the Piccadilly & St James's and Leicester Square areas. Our purpose is to support the commercial wellbeing of the businesses and organisations we represent, and ensure our areas remain integral to London's West End offer as a place for people to visit, live, trade and work.

### London Environment Strategy – Response overview

The Mayor of London has published a draft of his London Environment Strategy. This is an overarching policy document drawing on a number of other strategies; most notably the Mayor's Transport Strategy. It sets out immediate policies, as well as a vision for 2050. Broadly, the Mayor's vision is that London should be "greener, cleaner and ready for the future". This involves an increase in green spaces, reducing emissions and pollution, saving resources and reducing waste. In general, we agree with the overall vision of the draft London Environment Strategy. However, while all the major environmental issues facing London are covered in the strategy, some of the policies in these areas are limited, and more clarity and commitment could be set out in the strategy.

On air quality, We broadly welcome the transport-related policies in the strategy, and recognise that shifting from journeys by private car, Private Hire Vehicle (PHV) and taxis to walking, cycling or public transport is vital to meet the challenges faced by the city. The strategy mentions that non-transport emissions are important, however it could go further in identifying what these are and how best to tackle them.

The strategy could be more ambitious and encourage more planting of trees and a greater increase in green space, particularly in dense urban areas where there is limited access to open space. The strategy outlines a proposal to make London the first National Park City. We are currently unsure on the benefits of this strand of the strategy, as detailed proposals have not been provided for how this would be achieved.

On the topic of climate change mitigation in particular, businesses will need advice and financial assistance to meet climate change measures; and acknowledgment of this in the strategy is positive. We welcome the Mayor pledging to work closely with BIDs to promote waste consolidation and to examine the feasibility of a commercial framework in London. Further action to look at commercial waste from SME's is required and how to make consolidation work better across different sectors.

The Mayor's powers over environmental issues vary significantly across the different areas, and issues such as waste are largely controlled at a borough-level. However, this has resulted in a strategy that delegates a lot of problems for other bodies to deal with. If these problems are to be tackled effectively, the Mayor will need to provide guidance and resources to these bodies to ensure that they are equipped to implement the policies that the strategy sets out.

## Response to consultation

### OVERARCHING QUESTIONS

In general, we agree with the overall vision and principles of the draft London Environment Strategy. However, while all the major environmental issues facing London are covered in the strategy, some of the policies in these areas are limited, and more clarity and commitment could be set out in the strategy.

The strategy lacks detail in many areas, particularly regarding funding, and that post-2020 the policies to achieve these aims become vague. There is a danger that this will result in short-term successes, but that people may lose sight of the 'big picture' over time. Similarly to the Mayor's Transport Strategy we would recommend, therefore, that more detailed interim targets and roadmaps are set out to ensure that these longer term goals are achieved.

The strategy sets out clear expectations on the role of businesses to protect and improve London's environment. We agree that there is a significant role businesses, both large and small, can play in meeting the aims of this strategy. However, some further clarity on the responsibility of individuals would be helpful; a lot of progress could be made, particularly on air quality and waste, by changing behaviour. Both individuals and businesses will be required to change to meet the ambitious targets laid out.

The Mayor's powers over environmental issues vary significantly across the different areas and therefore a linked up approach between the Local Authorities and Central Government is essential for these items to be effectively addressed, targeted and controlled for measurable achievements. The Mayor will need to provide guidance and resources to local authorities, external bodies and organisations to ensure that they are equipped to implement the policies that the strategy sets out.

### AIR QUALITY

We are committed to the approach that the Mayor should be aiming high when it comes to air quality standards. Therefore, London should be striving to meet air quality and particulate matter standards than those set by the World Health Organisation (WHO). In that respect, we welcome the strategy's recognition that these targets should be seen as a starting, rather than an end point. We have responded in more detail to the measures proposed to tackle transport related emissions during the recent consultation on the Mayor's Transport Strategy.

We broadly welcome the transport-related policies in the strategy, and recognise that shifting from journeys by private car, PHV and taxis to walking, cycling or public transport is vital to meet the challenges faced by the city (4.2.1a). With Central London having the most pressing need from poor air quality, we would also welcome the Mayor considering how many of the measures and targets set out in the strategy can be brought forward for Central London specifically. A 'one size fits all' approach here lacks direction and fails to recognise that central and inner London has some unique challenges and supports greater ambition in policy.

We agree with the Mayor's intention to work towards zero-emission vehicles and transport, but argue that this process should be expedited, and that it is possible for London to have zero-emissions buses far sooner than the 2037 timeframe set out in the strategy (4.2.1.b). There should also be clearer and accelerated targets for zero emissions taxis and private hire vehicles (4.2.1.c), along with targets for coaches, and clearer rules and better enforcement on idling.

While identified as a challenge, the capacity of London's power grid has not been addressed in the strategy and this is a major barrier to the successful rollout of Electric Vehicle (EV) charging infrastructure. An action plan for London's power network and substation capacity should be part of this strategy given many of the proposed solutions require switching from fossil fuel sources to a decarbonised grid.

We recognise that it may be necessary to close roads in Central London for short periods of time when pollution levels are at their highest. However, we ask that the needs of Central London businesses be considered during this process, and that essential servicing and deliveries are still able to be made during this time, particularly for restaurants and other venues requiring fresh produce (4.1.1a).

We request direct involvement in the proposals to reduce freight traffic at peak times, and would welcome the role of BIDs in piloting consolidation of waste and deliveries being explicitly referenced in this part of the strategy (4.2.1e).

While we agree that raising awareness of the impacts of poor air quality among Londoners is important, it is important that this is carried out in such a way that does not encourage 'scaremongering' or reputational impact on our city. The Mayor should aim to educate about air quality alongside policy action and how individuals can change their behaviour (4.1.2).

The strategy mentions that non-transport emissions are important, however, the strategy should go further in identifying what these are and how best to tackle them. For example, pollution during construction is an issue in London and the strategy does not discuss this in great enough detail. Most responsible development companies already have lower emissions and particulate targets than those set out in the strategy. The Mayor should look at the standards being set by these companies, and consider setting a London-wide standard for construction emissions based on this, to encourage all developers and contractors operating in London to work to a better standard (4.2.3b).

While the issue of wood burning stoves is identified as a significant cause of emissions, no clear action is being proposed (4.3.3c) beyond improved information and enforcement of existing rules. This seems an example of where little action is required from individuals, whereas larger businesses are subject to further regulation.

## GREEN INFRASTRUCTURE

The strategy outlines the Mayor's ambition that more than half of London's area should be green, and that tree canopy cover should increase by 10% by 2050. As the level of green space in London has been slightly decreasing, we agree that this policy is desirable, and we are supportive of the plan to create more pocket parks across the city, and to encourage greening in urban areas (5.1.1c).

However, the strategy should be more ambitious, encouraging more tree planting and a greater increase in green space, particularly in dense urban areas where there is limited access to open space. The strategy does not go into great practical detail on how this 'greening' can be achieved, however we understand that the London Plan will outline expectations for developers when it is published (5.1.1d). We request a direct role in shaping greening proposals for the West End.

The Greener City Fund of £3 million per year will be insufficient to encourage adequate tree planting or green space creation on the scale envisaged by the strategy alone (5.1.1e). With other priorities around affordable housing, public realm, green construction and other social benefits, it will be challenging to extract sufficient contributions from development. We would support innovative thinking on how to secure funding for green

spaces, and strategic projects, including Natural Capital Account<sup>1</sup> for London's green spaces (5.3.1b, 5.3.1d). We would like to work in partnership to develop a stronger evidence base and priorities for investment (5.3.1c). Heart of London recognises the importance of our green infrastructure in the liveability, reputation and beauty of our city, and the wellbeing of residents, workers and visitors alike.

The strategy outlines a proposal to make London the first National Park City (5.3.1e). We can appreciate the benefit to be achieved from attaching this label to highlight that London contains many important habitats and rare species, and the city could benefit from a single 'brand' to communicate greening initiatives. However, the proposals seem to duplicate agencies, organisations and powers that already exist to protect the natural environment. While there are no new restrictions against development or activity proposed, the strategy needs a clearer explanation of what a 'National Park City' is, the goals of the declaration, and what future regulations may be imposed to meet its criteria.

## CLIMATE CHANGE MITIGATION AND ENERGY

We strongly support actions to make London a zero carbon city by 2050, though have some concerns about that lack of detailed interim targets. We understand that a series of London carbon budgets (aligned with UK government), will give further detail on this in future and are supportive of enhanced monitoring (6.1.5). We appreciate that the achievements of this goal will require coordinated action at national and local government level, as well as the policies and programmes of the Mayor.

The strategy recognises that a lot of the powers over climate change and energy lie with either national or local government, but it does not explain in sufficient detail what additional funding will be made available to help meet the desired 30% reduction under city control.

The strategy announces the Mayor's intention to set up an energy company inside the 'Energy for Londoners' programme. This is a concept that has worked well elsewhere, in a number of local authorities and cities such as Doncaster. We therefore support in principle that this could be beneficial for London. However, the strategy document does not provide enough information on the Energy for Londoners programme to make any assessment whether it will meet the aim of becoming a zero carbon city and we look forward to more detailed plans being announced.

On the topic of climate change mitigation in particular, businesses will need advice and financial assistance to meet climate change measures; and acknowledgment of this in the strategy is welcomed. We support helping public sector institutions through the RE-FIT programme<sup>2</sup>, in particular a focus on cultural and heritage organisations (6.1.3a). Extending this to the wider commercial sector with a commercial boiler scrappage scheme, expansion of RE-FIT and enhanced guidance (6.1.3b) is strongly supported so that the 40% of emissions from commercial premises can be tackled.

We welcome further work to develop priorities for district heating and decentralised energy, and would hope that this focusses both on commercial and residential properties, retrofitting and new build (6.2.2).

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<sup>1</sup> Natural capital accounting is the process of calculating the total stocks and flows of natural resources and services in a given ecosystem or region. Accounting for such goods may occur in physical or monetary terms. This process can subsequently inform government, corporate and consumer decision making as each relates to the use or consumption of natural resources and land, and sustainable behaviour.

<sup>2</sup> RE:FIT is the Mayor of London's energy efficiency programme, to help London's non-domestic public buildings reduce energy bills and carbon emission. To date across the programme, energy savings of 15-20%, and paybacks of 5-7 years are typical. The programme provides free consultancy, help with financing and fast track procurement process for energy conservation and efficiency, renewables (solar PV) and energy generation schemes such as combined heat & power (CHP).

## WASTE

We are broadly supportive of the aims that by 2026 no biodegradable or recyclable waste will be sent to landfill and by 2030 65% of London's municipal waste will be recycled. This is a stretching but achievable target. BIDs like Heart of London have pioneered efforts to consolidate waste services, and improve commercial recycling performance, alongside delivering wider congestion and air quality benefits. We welcome the Mayor pledging to work closely with BIDs to promote the waste contract consolidation toolkit and to examine the feasibility of a commercial framework in London (7.2.2a). Further action to look at commercial waste from SME's is required and how to make consolidation work across different sectors.

A circular economy approach to waste is supported, and we recognise that there are certain items, such as food waste, coffee cups and single use food packaging that are particular issues. BIDs welcome the support being offered to reduce food waste, such as through the Greater London Authority's food save programme (7.1.1a).

We would welcome the introduction of a bottle return scheme for London, but this would need to be implemented in such a way that does not encourage it to be used as a way of generating income and facilitating the street population. The plastic bag charge has proven hugely successful in London, and this should be replicated in incentivising the increased use of reusable bottles and coffee cups, rather than those designed to be single-use (7.1.1b).

There needs to be a clearer focus on the cost of different types of waste, and these should be incentivised accordingly to ensure that people are discouraged from generating non-recyclable waste. The investment funding in the circular economy is strongly supported (7.1.1c). In addition to this, measuring recycling levels by carbon rather than weight may allow for more accurate measuring of the carbon impact of waste disposal.

## CLIMATE CHANGE ADAPTATION

We are supportive of the approach outlined by the Mayor to plan for the impacts of climate change including more regular heatwaves, water shortages and flooding; including changes to the planning system, reducing the impacts of the urban heat island, measure for public transport, and planning for future flood and water infrastructure.

## AMBIENT NOISE

We are broadly supportive of the approach outlined though we would note that despite implications for ambient noise the expansion of airport capacity in the south east is of vital economic importance. We welcome the explicit reference to the recently published Mayor's Culture and Night Time Economy Supplementary Planning Guidance and the introduction an 'agent of change' principle designed to protect existing licensed and cultural venues threatened by new residential properties (9.2.2).

## APPENDIX I – London Environment Strategy Policies and Proposals

The full version of the London Environment Strategy can be read [here](#), alongside the [executive summary](#). References to specific policies and proposals (i.e. 2.1.1a) refer to the main strategy.

A summary of the strategy is outlined below:

### Overarching Issues

- The Mayor says he wants London to be “the world’s greenest city”, which he says means it should be:
  - **Greener:** planting more trees, make parks more accessible and encourage ‘greening’ of buildings and public space.
  - **Cleaner:** reduce vehicle emissions and pollution, roll out sustainable drainage, improve sewers, and encourage more renewable energy generation.
  - **Ready for the future:** new flood defences and water resources, saving resources through smart meters, waste reduction and more recycling.
- The key aims and vision for 2050 set by the strategy are:
  - **Climate change and energy:** London will be a zero carbon city – with a zero emission transport network and zero carbon buildings.
  - **Waste:** London will be a zero waste city. 65% of London’s municipal waste will be recycled.
  - **Adapting to climate change:** London and Londoners will be resilient to severe weather and longer-term climate change impacts, such as flooding, heat risk and drought
  - **Green infrastructure:** More than half of London’s area will be green, and tree canopy cover will increase by ten per cent by 2050.
  - **Air quality:** London will have the best air quality of any major world city by 2050, going beyond the legal requirements to protect human health and minimise inequalities.
  - **Noise:** The number of people adversely affected by noise will be reduced, and more quiet and tranquil spaces will be promoted.

### Air Quality

- Tackling poor air quality in London is a major part of the strategy with an aspiration that we have the best air of any major city by 2050
- Has been huge progress since Clean Air Act 60 yrs. ago, though still in breach of legal UK and EU limits for some pollutants, notably nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>10</sub>, PM<sub>2.5</sub>, and black carbon)
- Unlike many areas there is some policy urgency on this issue, with particular focus on reducing transport related emissions due to Mayor’s control over this area (see the Mayor’s Transport Strategy for further detail)
- Main route to deliver is encouraging Londoner’s to walk, cycle or use public transport rather than cars, and phasing out polluting vehicles through penalties or bans.

## Green Infrastructure

- The Mayor's wants to set an overarching target that more than half (vs 47% now) of London's area should be green and for tree canopy cover (20% now) to increase by 10% by 2050
- States will make London the first 'National Park City', however greening initiatives have little funding (£3m per annum) attached to encourage more tree planting or green space creation
- London Plan will have more detail on how 'greening' requirement in new developments will be strengthened and this is expected in late November / early December
- Reiterates commitment to protect Green Belt from new development

## Climate Change Mitigation and Energy

- London has cut its CO<sub>2</sub> emissions by 16% from 1990 but further action needed to meet zero carbon target by 2050. Local city action can cover 30% of Greenhouse Gas emissions reduction.
- Policy context of reducing central government investment and subsidies for renewables or insulation makes this difficult
- Three quarters of energy used for heating and hot water, and one in ten electricity substations at capacity
- Mayor to set up 'Energy for Londoners' as a not-for-profit energy supply company (though some have criticised for delivering white label plus model rather than a fully state owned energy company). It will aim to use surplus to:
  - Support improving energy efficiency of buildings and pilot new approaches to retrofitting
  - Target homes in fuel poverty and extend efficiency regulations to private landlords (PRS)
  - Offer fairer energy bills
  - Increase clean energy generation and heat networks

## Waste

- Only half of London's waste recycled and landfill capacity due to run out by 2026. Plan to reduce, reuse and recycle more and use residual waste for energy generation.
- Aim to make London a zero waste city, with no biodegradable or recyclable waste to landfill by 2026 and by 2030, 65% of London's municipal waste to be recycled. Aims to do this by:
  - Setting stricter recycling and food waste targets for waste authorities (groups of councils) to meet by 2020
  - Funding for local authorities to improve recycling rates
  - New campaigns to cut food waste, particularly for businesses, to reduce by 20% by 2025.
  - Work with businesses to design out waste, and investigate deposit return schemes for bottles and coffee cups
  - Promote shared waste collection services – such as those delivered by BIDs
  - Invest in start-up circular economy businesses

## Climate Change Adaptation

- Planning for impacts of climate change including more regular heatwaves, water shortages and flooding. The Mayor will:
  - Lobby for more secure water supply for London and start planning for the Thames Barrier replacement
  - Ensure new development more resilient through the planning system
  - Take action on water leakages, burst water mains and clean up London's waterways
  - Reduce the impact of heat on streets and public transport through more canopy cover and use various passive, recovery and active measures for tube and buses

## Ambient Noise

- Excessive noise is a health hazard, with 2.4 million Londoner's exposed to levels above international guidance.
- Largely from transport and industry, through recognition that noise is a part of a vibrant city
  - Oppose expansion of Heathrow and call on better regulation of helicopter noise
  - 'Modal shift' from cars through MTS will substantially reduce noise
  - Targeted investment to reduce noise on TfL train / tube network, particularly around growing Night Tube
  - More respite through green and pleasant places in city

## APPENDIX II – London Environment Strategy Consultation Questions

### Overarching questions

- Q1. Do you agree with the overall vision and principles of this draft London Environment Strategy?
- Q2. To achieve the policies and proposals in the strategy, which organisations should the Mayor call upon to do more (for example central and local government and businesses) and what should the priorities be?
- Q3. Do you agree that this draft London Environment Strategy covers all the major environmental issues facing London?
- Q4. There are a number of targets and milestones in this draft London Environment Strategy, what do you think are the main key performance indicators that would demonstrate performance against this integrated strategy?
- Q5. What are the most important changes Londoners may need to make to achieve the outcomes and ambition of this strategy? What are the best ways to support them to do this?

### Air Quality

- Q1. Do you agree that the policies and proposals outlined will meet the Mayor's ambitions for air quality in London and zero emissions transport by 2050? Is the proposed approach and pace realistic and achievable, and what further powers might be required?
- Q2. Do you agree with the Mayor's policies and proposals to raise Londoners' awareness of the impacts of poor air quality?
- Q3. Do you agree with the Mayor's policies and proposals to safeguard the most vulnerable from poor air quality?
- Q4. Would you support emergency measures, such as short-term road closures or vehicle restriction, during the periods of worst air pollution (normally once or twice a year)?
- Q5. Do you agree with the proposed approach to reducing emissions from non-transport sources (including new buildings, construction equipment, rail and river vehicles and solid fuel burning)?

### Green Infrastructure

- Q1. The Mayor's ambition is to make London a National Park City. What should the attributes of National Park City be and what would we need to achieve for it to be considered successful?
- Q2. In what ways can the Mayor help to ensure a more strategic and coordinated approach to the management of London's network of parks and green spaces?
- Q3. Do you think the proposed policies and programmes will ensure London's important wildlife is protected and enhanced?
- Q4. Do you think the proposed policies and programmes will be effective in increasing London's tree canopy cover?
- Q5. How best can natural capital thinking be used to secure greater investment in the capital's green infrastructure?

### Climate Change Mitigation and Energy

- Q1. Do you agree that the policies and proposals outlined will meet the Mayor's ambition to make London a zero carbon city by 2050? Is the proposed approach and pace realistic and achievable?
- Q2. To achieve the Mayor's zero carbon ambition we estimate (between now and 2050), up to 100,000 homes will need to be retrofitted every year with energy efficiency measures. Do you agree with the Mayor's policies and proposals to achieve his contribution to this? What more can central government and others do to achieve this?

*Q3. Which policies or programmes would most motivate businesses to reduce energy use and carbon emissions?*

*Q4. Please provide any further comments on the policies and programmes mentioned in this chapter, including those in the draft solar action plan and draft fuel poverty action plan that accompany this strategy.*

## **Waste**

*Q1. Do you agree that the Mayor's policies and proposals will effectively help Londoners and businesses to recycle more?*

*Q2. Do you support the Mayor's ambition to ensure food waste and the six main recyclable materials (glass, cans, paper, card, plastic bottles and mixed plastics) are collected consistently across London?*

*Q5. What are the most effective measures to reduce single-use packaging in London such as water bottles and coffee cups?*

*Q6. Please provide any further comments on the policies and programmes mentioned in this chapter.*

## **Climate Change Adaptation**

*Q5. Please provide any further comments on the policies and programmes mentioned in this chapter.*

## **Ambient Noise**

*Q4. Please provide any further comments on the policies and programmes mentioned in this chapter.*