

Appendix A: Response to Draft London Environment Strategy

Introduction

The draft London Environment Strategy (LES) is one of seven strategies which are intended to deliver the Mayor's vision for London. The Mayor's intended environmental outcomes are for a London that is greener, cleaner, and ready for the future.

The Mayor has launched a three-month public consultation on the draft LES, which is due to close on 17 November 2017. This paper sets out the council's proposed response which identifies; what the council already delivers, opportunities for the council to deliver more, or differently, and where there are appropriate grounds for challenge. Environment Committee is invited to review and approve the council's proposed response.

The strategy consists of three component parts across eleven chapters;

1. Strategic Aims
2. Strategic Approaches
3. Timeline.

There are six strategic aims (set out in chapters 4 to 9). These are:

- Best air quality of any major city
- More than half of London to be green
- Zero carbon city; including a zero-emission transport system and zero carbon buildings
- Zero waste city
- London and Londoners to be resilient to severe weather and long-term climate change
- Reduce the number of people adversely affected by noise.

Where applicable, local government responsibilities have been identified for each aim. This paper outlines which of those responsibilities are already being met by the council, those which need to be addressed, and those to which the council offers challenge.

There are four strategic approaches (set out in chapter 3). These are:

- Low carbon economy
- Smart digital city
- Green infrastructure
- Healthy streets

This paper sets out how the council has adopted elements of these strategic approaches in the existing programme of transformational change across the Environment Portfolio.

The Mayor has provided a timeline in the draft LES by which he anticipates the multiple outcomes of the London Environment Strategy will be delivered. This paper puts forward the council's response to these timescales; including whether they are feasible.

1. Strategic Aims

The draft LES sets out six strategic aims intended to deliver outcomes for a London that will be greener, cleaner, and ready for the future.

Of the six strategic aims, there are only three for which the draft LES identifies responsibilities and recommended actions for London Boroughs; these correspond to those policy areas in which the Mayor has jurisdiction. This is problematic for the remaining three aims; not only because there are no suggestions for practical action but also because there is a question as to how the Mayor intends to deliver outcomes in policy areas where neither he, nor London Boroughs, play a statutory role. These are:

- Green infrastructure
- Climate change and energy
- Adapting to climate change

However, one advantage is that London Boroughs will have the opportunity to create an approach that best delivers for their respective localities; allowing them to prioritise the needs of residents, businesses and visitors.

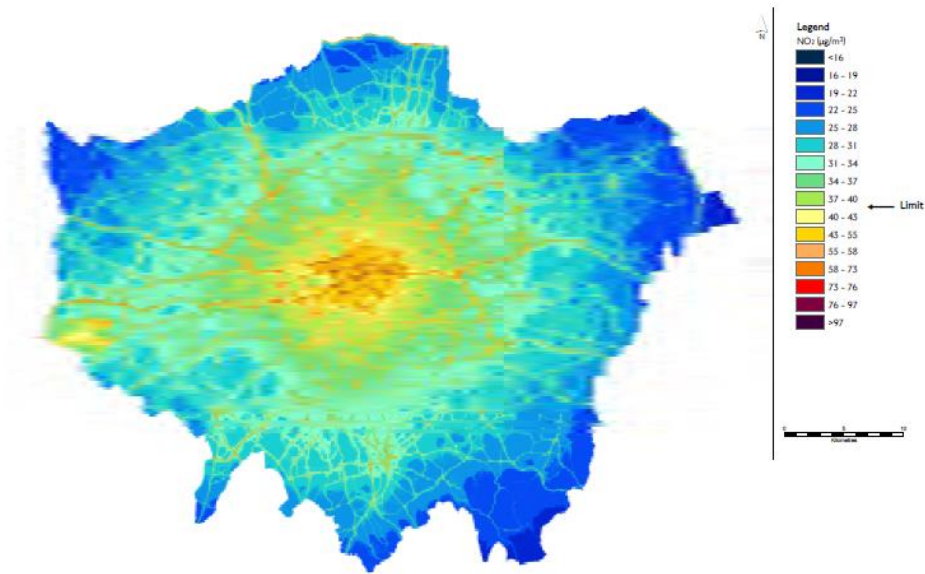
Air Quality

The Mayor aims; *“for London to have the best air quality of any major city by 2050, going beyond the legal requirements to protect human health and minimise inequalities”*.

The Mayor acknowledges that, since the passage of the Clean Air Act in 1956, there has been demonstrable progress in improving air quality in London; including a reduction in the levels of benzene, lead and sulphur dioxide. However, the remaining levels of particulate matter (e.g. black carbon) and nitrogen dioxide remain a concern; London is currently failing to meet the legal limit for the latter.

Figure 7 below, taken from the draft LES and produced by the London Atmospheric Emissions Inventory, shows the areas of London with the highest levels of pollution:

Figure 7: 2013 - Annual mean NO₂ concentrations



Source: GLA (2017), London Atmospheric Emissions Inventory (LAEI) 2013 Update.

The Mayor intends to; reduce the level of exposure of Londoners to air pollution (with a focus on schools and school children), achieve legal compliance with UK and EU pollution limits, and meet the World Health Organisation air pollution targets by 2030. His approach will be to address health inequality, engage in partnership working (e.g. with London Boroughs) and transition to a 'zero-emission London'; the latter to reduce the use of diesel vehicles and dependence on the fossil fuel economy.

The draft LES sets out the expectation for London Boroughs to take responsibility for local levels of air pollution and to act in accordance with the statutory London Local Air Quality Management (LLAQM) framework. The requirements of the framework are to:

- Continue to monitor and assess air pollution in the local area
- Ensure a local Air Quality Management Area (AQMA) is declared for those areas that exceed EU air pollution limits
- Ensure an action plan is in place for all AQMAs; the plan should be updated every five years and progress reviewed annually.

The council adheres to the statutory requirements of the LLAQM framework as set out above. The council has action plans in place for all AQMAs.

The council is particularly concerned about schools; 15 of Barnet's 118 schools have air quality readings that are in excess of EU legal levels. The Chair of the Environment Committee and Leader of the Opposition have written to the Mayor of London to raise awareness of this issue.

The Mayor makes the following recommendations for action, in addition to the LLAQM;

- Implement emissions-based parking charges
- Reduce pollution from new developments via planning regulations
- Encourage increased walking and cycling by improving the public realm
- Increase green infrastructure and introduce vehicle restrictions at 'pollution hotspots'.

There are many parallels between the Mayor's strategic aims and approaches as set out in the draft London Transport Strategy (LTS) compared with the draft LES (e.g. Healthy Streets). The council's response to the draft LTS was submitted to Environment Committee for review on 11 September 2017 and to Policy and Resources Committee on 10 October 2017.

There are projects currently in delivery to reduce emissions via the use of car clubs and electric vehicles, and the council is exploring the options for introducing emissions-based car parking charges. The council is also developing a long-term sustainable transport strategy for future travel across the borough and has an air quality action plan in place to bring each of these initiatives together.

The Mayor also recommends that London Boroughs discourage the anti-social burning of waste and the illegal use of wood-burning stoves. There is an expectation that London Boroughs incorporate improving air quality into health-related activities. Furthermore, the Mayor recommends that London Boroughs 'lead by example' by reducing the emissions of the council vehicle fleet and by raising awareness with customers.

The council is committed to ensuring health-based outcomes for residents, as evidenced by the Fit and Active Barnet strategy. Links are already being made between the environment and healthy lifestyles; such as access to parks and green spaces for physical and mental wellbeing. The Parks and Open Spaces strategy sets this out in greater detail. The Council's forthcoming Long-Term Transport strategy will align with the authority's Health and Wellbeing strategy; one will very much inform the other.

The council is committed to delivering enforcement and education across Barnet to discourage anti-social behaviour; including damage to the environment.

There is potentially an opportunity to reduce emissions of the council's fleet; namely, recycling and waste, cleansing, and grounds maintenance vehicles. However, this would be dependent on the market landscape for electric service vehicles. There would be additional logistical challenges in terms of ensuring adequate numbers of vehicle charging points across the borough and the cost of maintaining and repairing an electric fleet; this is not currently known and has not been scoped as part of the draft LES.

There are the following challenges in response to the draft LES:

- A significant proportion of the borough's emissions come from highways outside of the council's jurisdiction which are owned by partners such as Transport for London or the Highway Agency. For example; the A1, M1 and A41 are major contributors of pollution in the borough.

- The Transport for London fleet is not on currently on track to become low or zero-emission; the timescales provided in the draft LES are significantly far-reaching (i.e. by 2037)
- Will other sources of funding become available, in addition to the Air Quality Management fund, to support London Boroughs in reducing emissions?

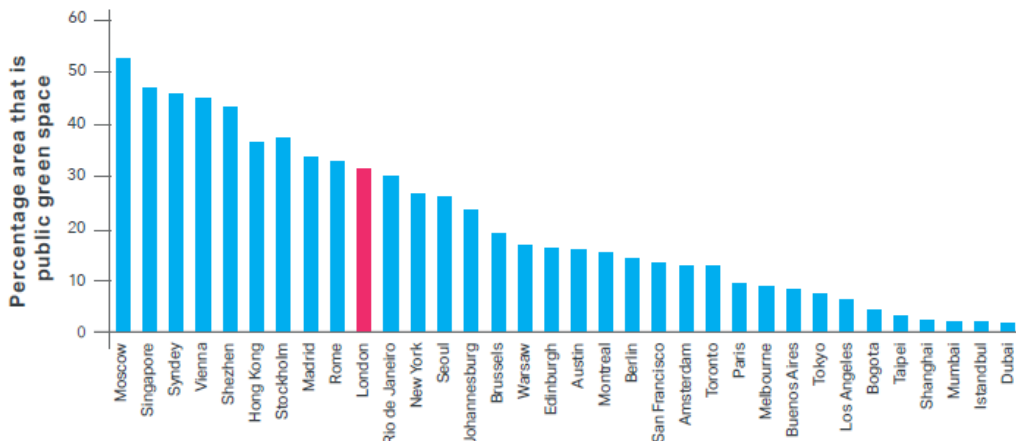
Green Infrastructure

The Mayor aims; *“for more than half of London’s area to be green and for tree canopy cover to increase by ten percent by 2050”*.

The Mayor regards London’s green infrastructure as a means to; improve the health of Londoners, protect the city from the effects of climate change, and support economic growth. The intention is for London to become a ‘National Park City’, where the Mayor will look to protect London’s green infrastructure by; increasing green canopy cover, conserving wildlife and natural habitats, and investing in London’s ‘natural capital’ as an economic asset. The Mayor intends to publish a Natural Capital Account for London’s parks and green spaces with the final version of the LES.

Figure 20 below, taken from the draft LES and sourced from the World Cities Culture Forum, shows that London is currently ranked 10th out of 34 world cities for percentage area of green space.

Figure 20: Percentage of public green space in different world cities



Source: based on World Cities Culture Forum (2017), The percentage of public green space (parks and gardens).

However, an area of concern raised in the draft LES is the ability to manage the impact of development and growth on the existing green infrastructure. There is no reference to

mitigation, beyond the need to protect and conserve the green spaces which already exist. Nor does the draft LES explicitly set out responsibilities for London Boroughs in terms of how they might support the Mayor in achieving his aim of making London 'more green', beyond continuing to manage the parks and open spaces within their respective localities.

The Parks and Open Spaces strategy sets out the council's vision for maximising green infrastructure across the borough, and the Tree Policy outlines the council's tree planting and management plan to increase canopy cover. There was also a Green Infrastructure proposal recently submitted to Policy and Resources Committee on 10 October 2017 which aligns with the local planning process.

The council's Green Spaces Programme oversees the delivery of several parks master-planning projects; including the development of local 'Sports Hubs', which promotes the council-wide Fit and Active Barnet agenda and enables residents to maximise their physical and mental wellbeing through access to the borough's green spaces.

The developing strategy for sustainable transport will encourage residents to use more environmentally-friendly modes of travel; such as walking and cycling, and work will continue with council partners to ensure a good quality of highways and byways throughout the public realm.

The council's planning department will continue to work with developers to ensure that new buildings are compliant with environmental regulations.

There are the following challenges in response to the draft LES:

- Does the Mayor intend to complete a cost-quality analysis of tree planting across London? Reference is made to a tree planting programme, including community grants for funding, but no analysis has been included. The Mayor acknowledges the need for a greater evidence base to support investment in green infrastructure
- What is meant by a 'National Park City'?
- The Mayor acknowledges the challenge of balancing the rate of population growth and need for urban development (e.g. housing) with protecting and increasing green space. Will there be the capacity for brown-belt development across London?

Climate Change and Energy

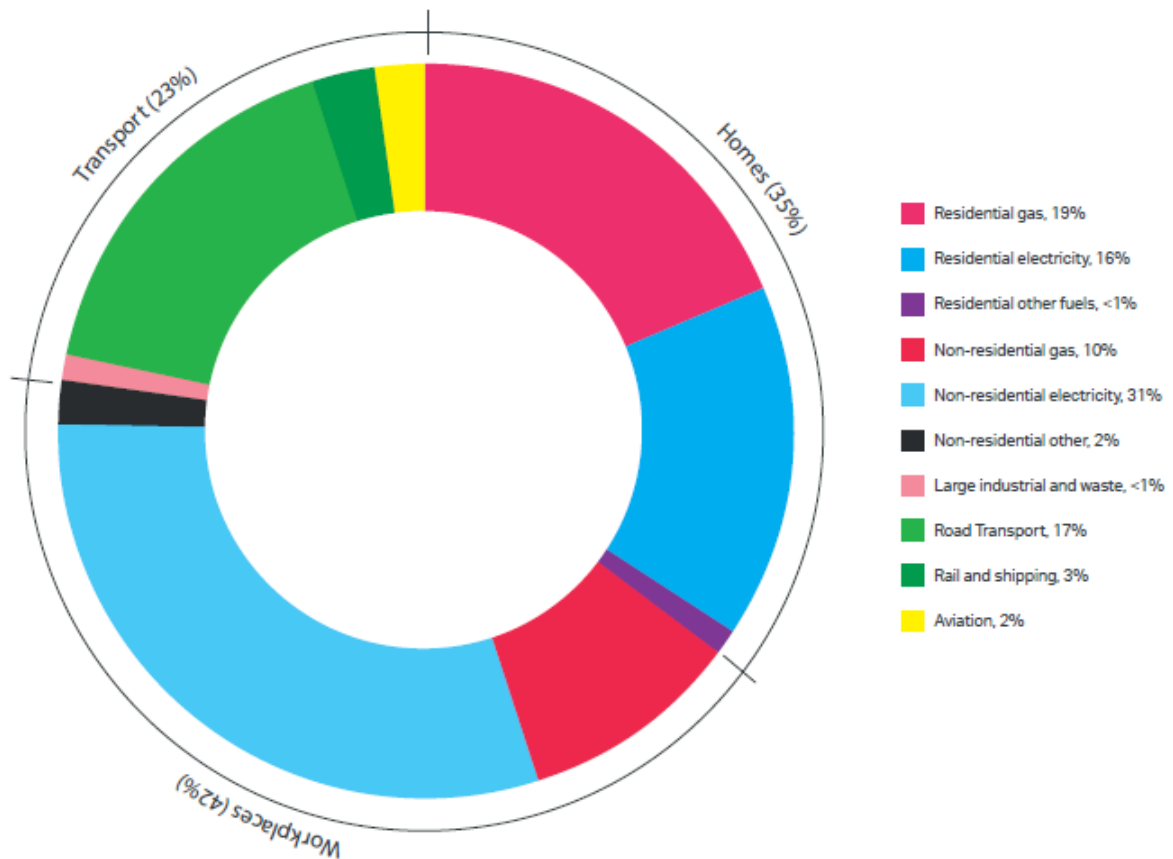
The Mayor aims; *"for London to be a zero-carbon city by 2050, with energy efficient buildings, clean transport and clean energy"*.

The Mayor refers to both the UN Paris Climate Agreement, to keep global warming to less than two percent, and the Climate Change Act 2008, which has a target of eighty

percent reduction in carbon dioxide levels compared to 1990, as supporting evidence for the proposed move to zero-carbon.

Figure 29 below, taken from the draft LES and provided by the Greater London Authority, illustrates the sources of greenhouse gas emissions in London.

Figure 29: 2014 emissions by sector (LEGGI)



Whilst there are no specific responsibilities, or actions, assigned to London boroughs, the Mayor sets out the following recommended reforms:

- 'De-carbonise' London's homes and workplaces (i.e. reduce emissions)
- Use local and renewable energy sources
- Deliver a zero-emission transport network.

The anticipated benefits to this approach, listed in the draft LES include; long-term economic growth, improved air quality, and a 'healthier society'.

There is an opportunity for the council to work with developers and partners, such as Barnet Homes, to encourage the use of lower carbon energy solutions for new buildings. However, it is not clear to what extent this would be a statutory responsibility.

There are the following challenges in response to the draft LES:

- Retro-fitting of existing building stock; what will be the mechanism for this?
- The 2050 target for London to be 'zero-carbon' is too far reaching to be measurable
- Reducing fuel poverty for all residents; the existing funding schemes do not yet apply to privately-owned or privately rented accommodation

Waste

The Mayor aims; *"to make London a zero-waste city. By 2026 no biodegradable or recyclable waste will be sent to landfill, and by 2030 sixty-five percent of London's municipal waste will be recycled"*.

According to the draft LES, the London economy produces approximately 7 million tonnes of waste per year at a cost of £2bn. Fifty-two percent of waste is recycled and it is anticipated that landfill capacity will be reached by 2026.

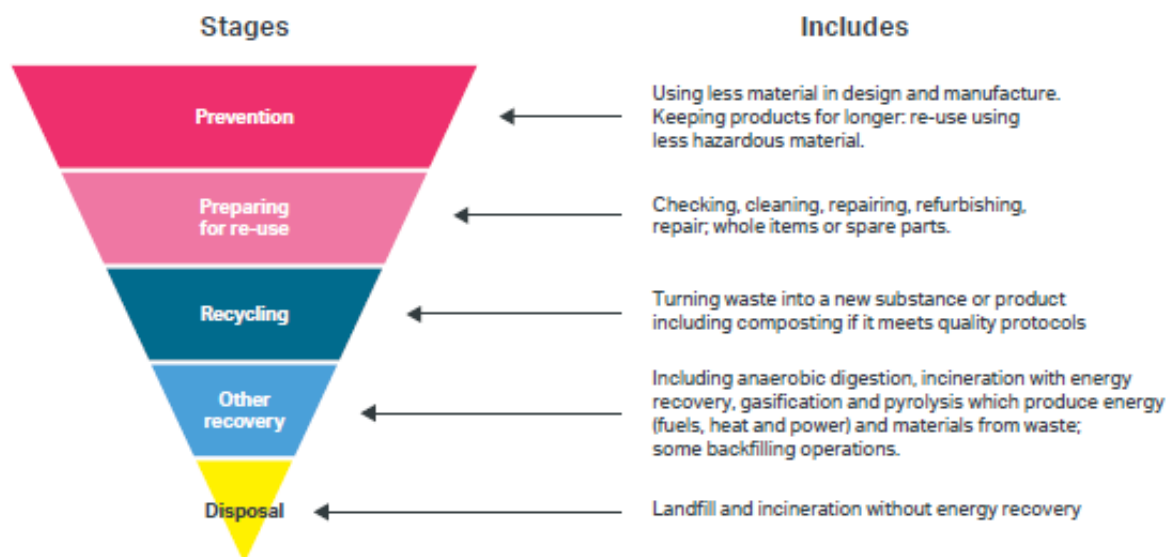
The expected benefits of a zero-waste London include; the provision of jobs and apprenticeships, access to secondary fuel, and a 'high-value income stream' from more effective waste management.

The Mayor is not a waste authority, however, he holds a regulatory function to ensure local authority waste plans conform with his policies. London Boroughs, as 'waste authorities' are expected to produce a waste management strategy or plan that includes:

- How waste will move up the waste hierarchy
- Local economic, social and environmental benefits
- A 'meaningful' contribution to the Mayor's waste targets

Figure 41 below, taken from the draft LES and provided by the European Commission on Waste, illustrates the waste hierarchy.

Figure 41: Waste hierarchy



Source: European Commission (2008), Directive 2008/98/EC on waste (Waste Framework Directive).

The council has a Municipal Recycling and Waste strategy which includes an aim to recycle at least 50% by 2020 and to exceed 50% by 2030.

Local waste authorities are also expected to:

- Offer the Mayor's minimum level of household recycling
- Make 'best use' of local waste sites
- Reduce the use of fossil fuel and reduce emissions
- Use 'Recycle for London' messaging and branding in campaigns
- Demonstrate positive changes to improve recycling
- Publicly notify intention to tender waste contract(s)
- (Procure) waste and recycling services to maximise local benefits
- Carry out other prevalent activity to support the Mayor's policies and targets

The council is working in partnership with the six North London Boroughs on consistency of approach and communications in municipal recycling and waste. The council also meets the draft LES requirement to separately collect household food waste and recyclable materials; this is a service that has been offered since October 2013.

There are the following challenges in response to the draft LES:

- The recycling target of 50% by 2025 is challenging and the increase to 65% by 2030 will be even more so. The Mayor does not refer to any available funding to help achieve these targets
- Borough-specific household waste targets are not appropriate. They would require additional resources to carry out monitoring, and what would be the penalty for non-achievement of a target or the incentive to achieve a target?
- The use of 'Recycle for London' branding is not appropriate for all campaigns; some campaigns specifically have no branding at all to appeal to distinct groups. Therefore the alternative wording of "*boroughs will support Recycle for London branding at all times*" is suggested
- Recycling rates are not the only measure for success; the Mayor should also consider residual weight-based targets per household, with decreasing targets over time
- There is a concern regarding the feasibility of the 50% commercial recycling target. What evidence has the Mayor used to set this target? Are there London Boroughs which have a commercial waste service that are on track to achieve this? The example used in Appendix 2 of the draft LES in Box 5 (Westminster City Council) only has a recycling rate of 16%.
- The minimum level of service for household recycling includes "*all properties with kerb-side recycling collections to receive a separate weekly food waste collection*". It is recommended that it is made clearer that this is in relation to how the waste is presented, as it may be more efficient for separately presented food and garden waste to be collected together in some circumstances.
- It is essential to tackle poor recycling performance in flats. What measures will the Mayor put in place to ensure that future flat developments are built to accommodate a 50%+ recycling target?
- The strategy relies on private waste management companies providing non-household waste recycling services. What are the incentives for the many private waste management companies to meet the targets in the draft LES?
- The draft strategy notes that "*implementing best set of household recycling interventions will cost waste authorities an extra £107m-£319m*". The upfront implementation costs are significant for waste collection authorities, especially in a time of decreasing budgets. Further work is therefore required on how these costs would be funded.

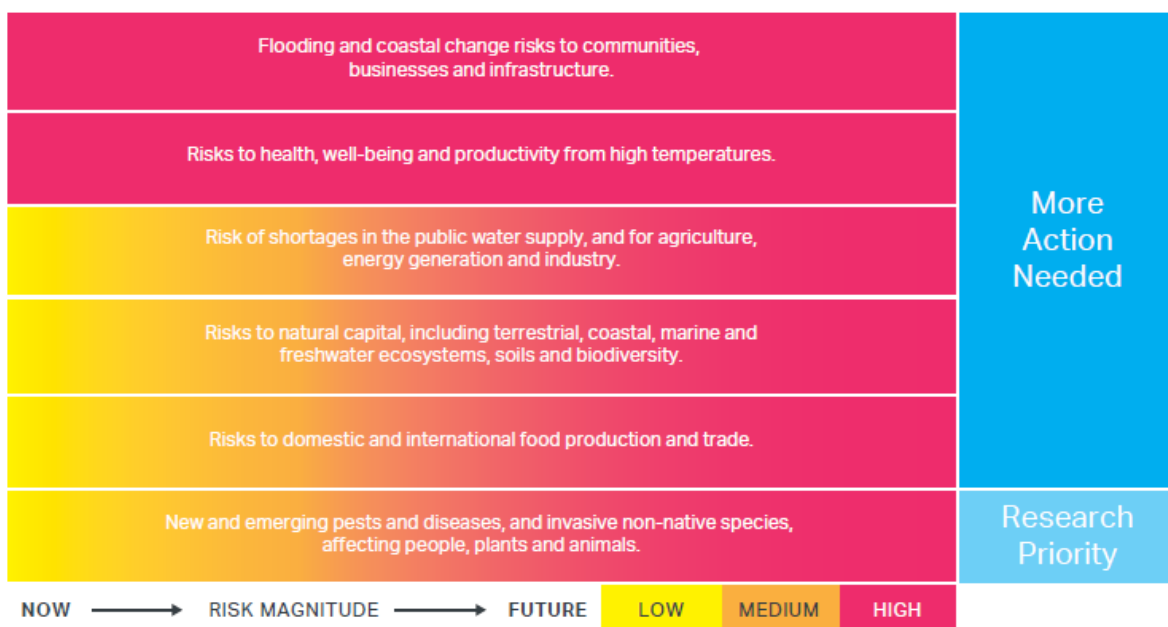
Adapting to Climate Change

The Mayor aims; *“for London and Londoners to be resilient to severe weather and longer-term climate change impacts. This will include flooding, heat risk and drought”*.

The draft LES identifies the challenge of managing increasing population growth with the demand on housing, infrastructure and environmental services. The Mayor anticipates that this challenge will be exacerbated by the impact of climate change, specifically; flooding, heat risk, and drought.

Figure 43 below, taken from the draft LES and provided by the Committee on Climate Change Adaptation Sub-committee, sets out the top climate change risks for the United Kingdom. The Mayor anticipates some regional variation for London.

Figure 43: Top six areas of inter-related climate change risks for the United Kingdom. Source: Adaptation Sub-Committee



Source: Committee on Climate Change Adaptation Sub-Committee (2016), UK Climate Change Risk Assessment 2017 Synthesis report: priorities for the next five years.

The Mayor recommends the following course of action to mitigate against the impact of climate change:

- Developers and businesses to understand and mitigate against climate change
- Use of flood defences and increased awareness of flood risk
- Resilient London water supply

- Infrastructure and services to be prepared for heat risk

The notable challenge to this section of the draft LES is regarding the legal roles and responsibilities involved in managing these risks. The Mayor has no statutory responsibility for water resources, nor flood risk, and there is no single authority across London with responsibility for managing heat risk. The success of the Mayor's proposals is therefore largely dependent on partners.

The responsibilities of London Boroughs for adapting to climate change are not clearly defined.

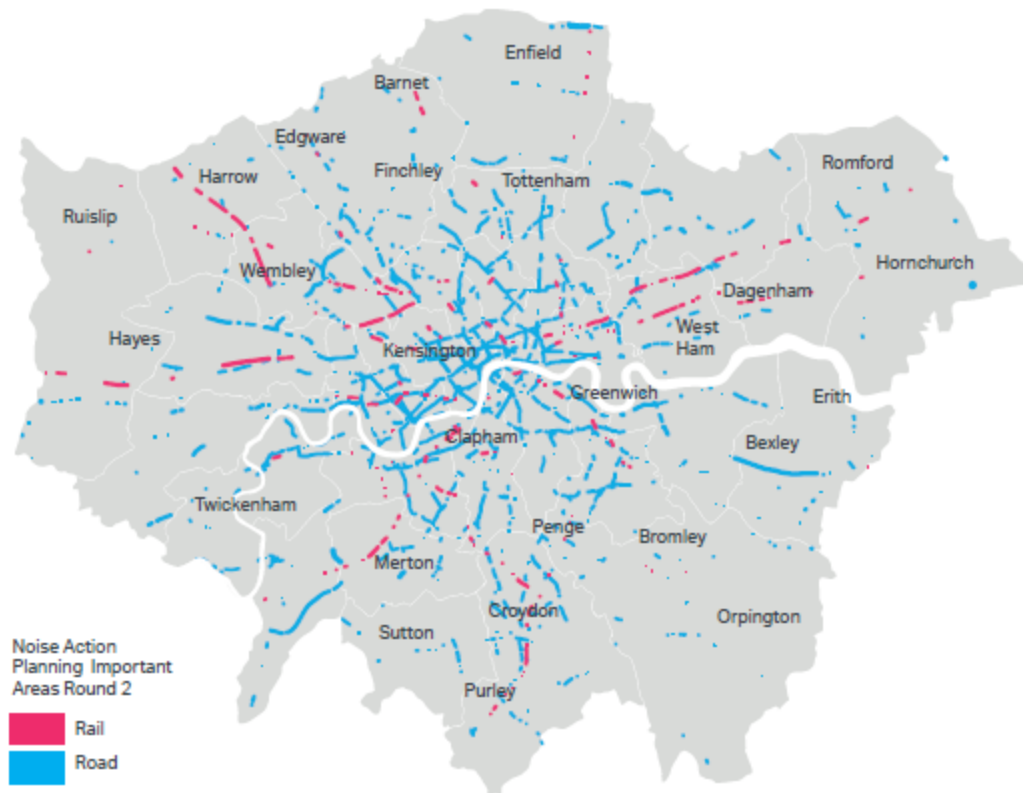
Ambient Noise

The Mayor aims; *“to improve Londoners’ quality of life by reducing the number of people adversely affected by noise and promoting more quiet and tranquil spaces”*.

The draft LES refers to the World Health Organisation assessment of ambient noise as being the ‘second largest environmental health risk’ in Europe after air quality. The anticipated benefits of reducing ambient noise include making London a city which is ‘healthier and more pleasant’ to live in. The Mayor raises concern about particular groups who may be more vulnerable to ambient noise, such as; children, people with chronic illness, the elderly, and shift workers. However, he acknowledges that there has not been any research carried out to test the impact of ambient noise on these vulnerable groups.

Figure 51 below, taken from the draft LES and provided by the Department for Environment, Food and Rural Affairs, illustrates ‘important noise areas’ for rail and road-based ambient noise.

Figure 51: Noise map of important areas for road and rail traffic noise across London



Source: Department for Environment, Food and Rural Affairs (2015). This information is licensed under the Open Government

The Mayor sets out the following responsibilities for London Boroughs, which involve managing and 'policing' noise from:

- Construction works
- Loudspeakers (street)
- 'Noise under the control of an employer'
- Premises
- Vehicles (street)
- Equipment or machinery (street)
- Drones or model aircraft

There are challenges in response to the draft LES:

- The council is constrained by the remit of its statutory powers and obligations; the Mayor does not make it clear to what extent London Boroughs are expected to 'police' ambient noise outside of that remit.

- What incentives (and / or methods of enforcement) will the Mayor use when working with commercial organisations to reduce ambient noise from air traffic, developers, rail services, and public transport services?

2. Strategic Approaches

The table below sets out the four strategic approaches outlined in the draft LES by the Mayor as a recommended means to deliver the six strategic aims discussed in the first part of this paper. The table below also sets out the existing programme of transformation across the council's Environment portfolio that is already delivering aspects of these strategic approaches.

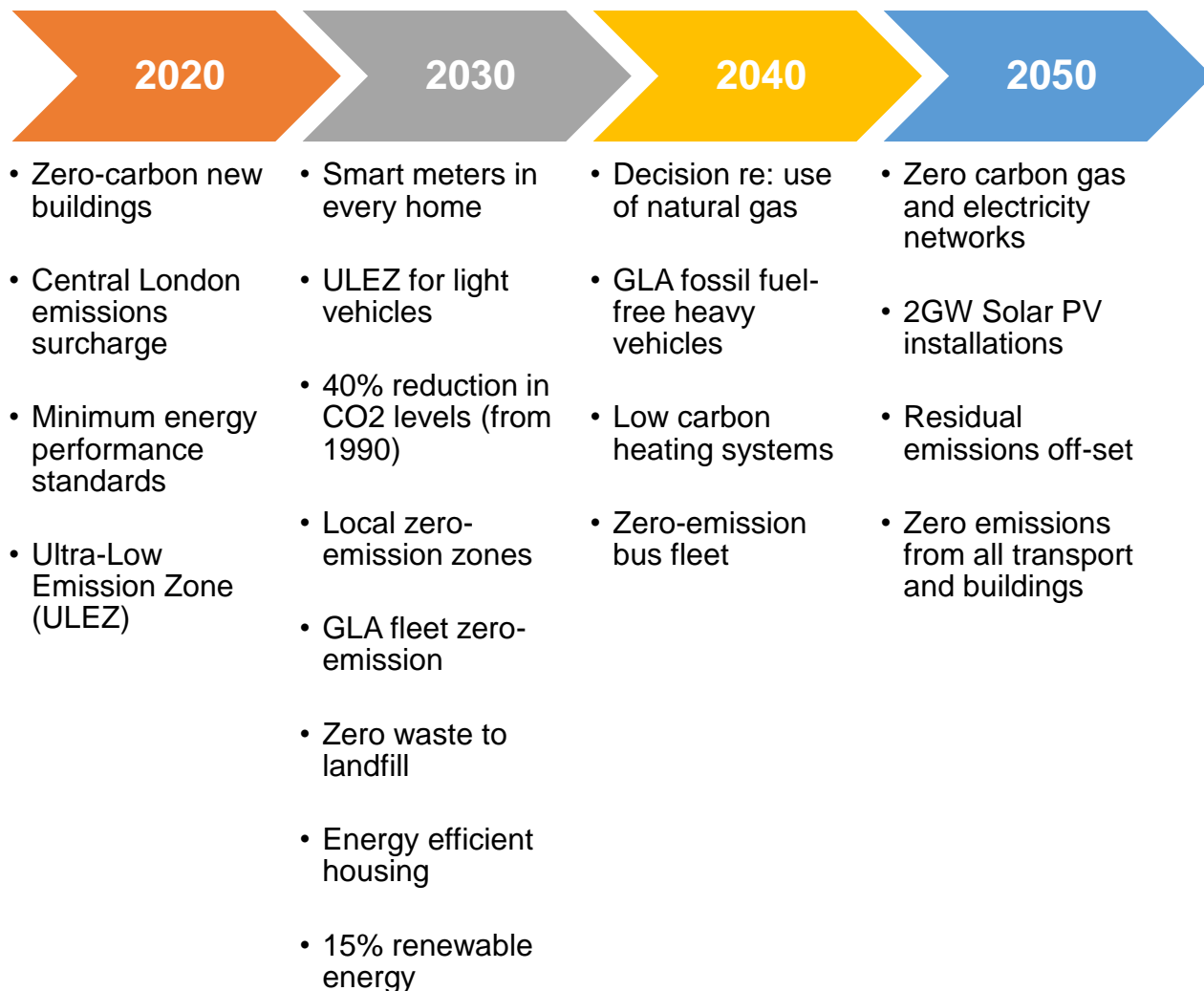
	LES Approach	LBB Approach
Low Carbon Economy	<ul style="list-style-type: none"> ▪ Increase use of public transport ▪ Counter impact of fossil fuels ▪ Counter 'disposable' economy: <ul style="list-style-type: none"> ➢ Pollution ➢ Resources ➢ Emissions ▪ Counter fuel poverty ▪ Value in recycling ▪ Low carbon infrastructure ▪ Business growth ("clean tech") 	<ul style="list-style-type: none"> ▪ Sustainable transport strategy (in progress) ▪ Car club project ▪ Electric vehicles project ▪ Emissions-based parking charges ▪ Increased commercial recycling ▪ Recycling and Waste strategy ▪ Use of sustainable energy in new-build council buildings (e.g. solar panels at Oakleigh Depot) ▪ Ongoing partnership with North London Waste Authority
Smart Digital City	<ul style="list-style-type: none"> ▪ Use of new technology ▪ Smart use of energy / water / waste ▪ Smart energy meters ▪ Smart lamp-posts / electric vehicles / Wi-Fi ▪ 5G phones ▪ Transport ▪ Data 	<ul style="list-style-type: none"> ▪ Electric vehicles project (lamp-column charging / street lighting) ▪ Customer Transformation Programme (council-wide) ▪ Use of Insight data for 'smarter' service delivery

	LES Approach	LBB Approach
Green Infrastructure	<ul style="list-style-type: none"> ▪ Natural Capital Accounting ▪ Increase cycling / walking ▪ Protect bio-diversity ▪ Improve physical and mental health ▪ Increase property prices ▪ Reduce flood / heat risks 	<ul style="list-style-type: none"> ▪ Review of bio-diversity across Barnet's green spaces (in progress) ▪ Natural capital accounting ▪ Tree policy ▪ Parks and Open Spaces strategy ▪ Fit and Active Barnet strategy (council-wide)
Healthy Streets	<p>Ten indicators for Healthy Streets:</p> <ol style="list-style-type: none"> 1. Clean air 2. Diverse pedestrians 3. Easy to cross 4. Shade / shelter 5. Places to stop/ rest 6. Not too noisy 7. Public transport / walking / cycling 8. People feel safe 9. Things to see / do 10. People feel relaxed 	<ul style="list-style-type: none"> ▪ Sustainable transport strategy (in progress) ▪ Street cleansing new service offer ▪ Enforcement and education ▪ 'Neighbourhoods' campaign ▪ CCTV strategic review ▪ Road-space asset review ▪ Highways improvement plan

The council is already taking steps to deliver the draft LES strategic approaches. However, there is an opportunity to incorporate aspects of the strategic approaches, not currently being delivered, into future business planning for 2020 – 2025; as part of the Priority and Spending Review and the renewal of the Environment Commissioning Objectives.

3. Timeline

The draft LES identifies some ambitious milestones up to 2050:



There is not much clarity provided for the next five years; instead, the Mayor has focused on a longer-term vision. This poses a challenge for London Boroughs in terms of translating these milestones into decisive actions with measurable outcomes; the timeline in the draft LES is too far-reaching.

There is no mention of a plan for the Mayor to engage with London Boroughs; this would be helpful in terms of a joined-up approach to delivery. There is also the issue of cross-party cooperation across London; the draft LES does not refer to the Mayor's approach to delivery in the face of a diverse political landscape.