

Consultation on the London Mayor's Draft London Environment Strategy:

Draft Consultation Response

Briefing note
Council Officer's Response

Compiled by Environmental Protection Team

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Consultation on the London Mayor's Draft London Environment Strategy

Introduction

The Mayor of London is consulting on the Draft London Environment Strategy. The strategy seeks to tackle pollution, promote cleaner energy & make more than 50 per cent of London green by 2050.

This is the first strategy to bring together approaches to every aspect of London's environment. The Strategy is divided into the following areas:

- [Air quality](#)
- [Green infrastructure](#)
- [Climate change mitigation and energy](#)
- [Waste](#)
- [Adapting to climate change](#)
- [Ambient noise](#)

Main objectives for London from the Strategy include:

Greener: All Londoners should be able to enjoy the very best parks, trees and wildlife. Creating a greener city is good for everyone – it will improve people's health and quality of life, support the success of businesses and attract more visitors to London

Cleaner: Londoners want their city to be clean, attractive and healthy – living in a big city does not mean they should accept a dirty and polluted environment. The Mayor will clean up London's air, water and energy in a way that is fair, protects the health of Londoners, and contributes to the fight against climate change.

Ready for the future: Water, energy and raw materials for the products we consume will be less readily available in the future, and climate change will mean higher temperatures, more intense rainfall and water shortages. The Mayor will make sure the city does not waste valuable resources, is prepared for the future and is safeguarded for future generations

This briefing with consultation comments by Officers has been produced to inform Members and provide an opportunity for comment before the consultation submission.

The deadline for the consultation submission is the 17th November.

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Aims, Policies and Objectives

The consultation sets out:

- The London Mayor's key aims, objectives and proposals for the six environmental policy areas; Air quality; Green infrastructure; Climate change mitigation and energy; Waste; Climate change adaptation and Ambient noise. To make the Mayor's vision of transforming the city's environment a reality, this strategy establishes some key aims for London.

The Mayor aims:

- for London to have the best air quality of any major world city by 2050, going beyond the legal requirements to protect human health and minimise inequalities
 - for more than half of London's area to be green and for tree canopy cover to increase by ten per cent by 2050
 - for London to be a zero carbon city by 2050, with energy efficient buildings, clean transport and clean energy
 - to make London a zero waste city. By 2026 no biodegradable or recyclable waste will be sent to landfill, and by 2030 65 per cent of London's municipal waste will be recycled
 - for London and Londoners to be resilient to severe weather and longer-term climate change impacts. This will include flooding, heat risk and drought
 - to improve Londoners' quality of life by reducing the number of people adversely affected by noise and promoting more quiet and tranquil spaces
- Four strategic approaches for informing and linking the strategy in a holistic approach through:
 - *low carbon circular economy*: A low carbon circular economy is one in which as much value as possible is extracted from resources, through their use and reuse, before they become waste.
 - *smart digital city*: A smart digital London is one that looks to use new technologies and increased connectivity to make better use of infrastructure and provide more efficient services.
 - *green infrastructure and natural capital accounting*: Natural capital accounting brings together the full benefits of green infrastructure and presenting them in a similar way to other capital assets, like buildings.
 - [*the Healthy Streets Approach*](#): The Healthy Streets Approach provides a framework for putting human health and experience at the heart of planning the city.

In addition to consultation questions for the six environmental policy areas there is also a set of general questions.

The following briefing provides objectives for each of the Policy Areas. The Strategy provides more detail setting out the Policy and Proposals under each objectives.

The full report can be found on: <https://www.london.gov.uk/WHAT-WE-DO/environment/environment-publications/draft-london-environment-strategy-have-your-say>

Officer response to the consultation questions are provided in Appendix A.

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Air Quality

Policy Area: 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.

With the following objectives they are expecting the following air quality improvements:

- For NO_x, compared to a 2013 baseline, a 40 per cent reduction is expected by 2020, a 53 per cent reduction by 2025, a 61 per cent reduction by 2030 and a 79 per cent reduction by 2050.
- For PM_{2.5}, compared to a 2013 baseline, a 26 per cent reduction is expected by 2020, a 34 per cent reduction by 2025, a 41 per cent reduction by 2030 and a 61 per cent reduction by 2050.

OBJECTIVES

SUPPORT LONDON AND ITS COMMUNITIES, PARTICULARLY THE MOST VULNERABLE AND THOSE IN PRIORITY LOCATIONS, TO HELP EMPOWER PEOPLE TO REDUCE THEIR EXPOSURE TO POOR AIR QUALITY

ACHIEVE LEGAL COMPLIANCE WITH UK AND EU LIMITS AS SOON AS POSSIBLE, INCLUDING BY MOBILISING ACTION FROM LONDON BOROUGHS, GOVERNMENT AND OTHER PARTNERS

ESTABLISH AND ACHIEVE NEW, TIGHTER AIR QUALITY TARGETS FOR A CLEANER LONDON BY TRANSITIONING TO A ZERO EMISSION LONDON BY 2050, MEETING WORLD HEALTH ORGANISATION HEALTHBASED GUIDELINES FOR AIR QUALITY

Green infrastructure

Policy Area: London will be a National Park City where more than half of its area is green; where the natural environment is protected and the network of green infrastructure is managed to benefit all Londoners.

With the following objectives they are expecting the following green infrastructure improvements:

- Protecting and increasing the amount of green space in the capital
- Increasing access to green spaces for Londoners of all ages, particularly in areas where there is currently a deficiency
- Increasing the quality of green spaces, ensuring they are well maintained and create healthy habitats for wildlife
- Valuing London green spaces, accounting for the health, environmental, social and economic benefits it brings to London.

OBJECTIVES

MAKE MORE THAN HALF OF LONDON'S AREA GREEN BY 2050

CONSERVING AND ENHANCING WILDLIFE AND NATURAL HABITATS

VALUE LONDON'S NATURAL CAPITAL AS AN ECONOMIC ASSET AND SUPPORT GREATER INVESTMENT IN GREEN INFRASTRUCTURE

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Climate change mitigation and energy

Policy Area: London will be a zero carbon city by 2050, with energy efficient buildings, clean transport and clean energy.

The Mayor's ambition is to have a zero emission transport network by 2050. This will be achieved through an integrated approach to reducing carbon emissions and air pollutants from transport. The policies and proposals to reduce London's carbon emissions from transport have therefore been combined with policies and proposals under the air quality chapter of this strategy.

OBJECTIVES

REDUCE EMISSIONS OF LONDON'S HOMES AND WORKPLACES WHILE PROTECTING THE MOST VULNERABLE BY TACKLING FUEL POVERTY

DEVELOP CLEAN AND SMART, INTEGRATED ENERGY SYSTEMS UTILISING LOCAL AND RENEWABLE ENERGY RESOURCES

A ZERO EMISSION TRANSPORT NETWORK BY 2050

Waste

Policy Area: London will be a zero waste city so that by 2026 no biodegradable or recyclable waste will be sent to landfill and by 2030 65 per cent of its municipal waste will be recycled.

OBJECTIVES

DRIVE RESOURCE EFFICIENCY TO SIGNIFICANTLY REDUCE WASTE, FOCUSING ON FOOD WASTE AND SINGLE USE PACKAGING WASTE

MAXIMISE RECYCLING RATES

REDUCE THE ENVIRONMENTAL IMPACT OF WASTE ACTIVITIES

MAXIMISE LOCAL WASTE SITES AND ENSURE LONDON HAS SUFFICIENT INFRASTRUCTURE TO MANAGE ALL THE WASTE IT PRODUCES

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Adapting to climate change

Policy Area: London and Londoners are resilient to severe weather and longer-term climate change impacts. This will include flooding, heat risk and drought.

OBJECTIVES

UNDERSTAND AND MANAGE THE RISKS AND IMPACTS OF SEVERE WEATHER AND FUTURE CLIMATE CHANGE IN LONDON ON CRITICAL INFRASTRUCTURE, PUBLIC SERVICES, BUILDINGS AND PEOPLE

REDUCE RISKS AND IMPACTS OF FLOODING IN LONDON ON PEOPLE AND PROPERTY AND IMPROVE WATER QUALITY IN LONDON'S RIVERS AND WATERWAYS

ENSURING EFFICIENT, SECURE, RESILIENT AND AFFORDABLE WATER SUPPLIES FOR LONDONERS

LONDON'S PEOPLE, INFRASTRUCTURE AND PUBLIC SERVICES ARE BETTER PREPARED FOR AND MORE RESILIENT TO EXTREME HEAT EVENTS

Ambient noise

Policy Area: Improve the quality of life of Londoners by reducing the number of people adversely affected by noise and promoting more quiet spaces.

OBJECTIVES

REDUCING THE ADVERSE IMPACTS OF NOISE BY TARGETING LOCATIONS WITH THE HIGHEST NOISE POLLUTION FROM TRANSPORT

PROTECT AND IMPROVE THE ACOUSTIC ENVIRONMENT OF LONDON

The Strategy also provides details on the 'Transition to a low carbon circular economy' but there are no specific consultation questions relating to this area.

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Overarching Questions

1. Do you agree with the overall vision and principles of this draft London Environment Strategy?

London Borough of Lewisham supports the aspirations of the Strategy and is keen to work with the GLA in bringing the vision to reality, within the constraints of the growing demand in London for housing and related infrastructure requirements. It welcomes this overarching strategy and would want to see the principles transposed into relevant plans and policies within different environmental areas. It is an ambitious document that includes a number of positive proposals. Whilst we welcome the overall aims of the strategy, there are a few areas that we seek further clarification on which are detailed in the Council's comments to the main strategy areas.

One overarching area relates to the funding pressures that the boroughs, and other public organisations, currently face which needs to be recognised and taken into account when implementing actions. This also has ramifications for ongoing costs that will impact on boroughs. As an example, while the Council supports the aims to plant more trees and install more green infrastructure across London, this represents an ongoing cost in terms of maintenance that will likely fall on the boroughs. The Mayor's proposal to develop new business models for the delivery and management of London's green spaces, which we support, will need to give particular focus to this, as with all other environmental measures that require Council funding.

2. To achieve the policies and proposals in this 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?

In order to fulfil the vision of this strategy, the value placed on the environmental objectives outlined will need Central Government's endorsement/agreement and acceptance for the opportunities to be realised, otherwise there will always be pressure and compromise, that will override the needed health prerogative detailed in this strategy.

3. Do you agree that this draft London Environment Strategy covers all the major environmental issues facing London?

Yes, however, as stated in the London Council's response, the strategy doesn't mention non-native invasive species and the impact they have on biodiversity in London. This is a big problem in the capital and is expensive to address. The plan also does not mention light pollution and policy in this area would help biodiversity and reduce carbon emissions. Light has a major impact on bird migration, insects and nocturnal mammals.

4. 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 progress against this integrated strategy?

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There are already targets provided within the Strategy for the different chapter/areas, and where applicable we've commented on these in our consultation responses.

Air Quality has a particular focus for monitoring, in order to meet necessary health limits and the Council particularly support the following identified target within the Strategy:

“For NO_x, compared to a 2013 baseline, a 40 per cent reduction is expected by 2020, a 53 per cent reduction by 2025, a 61 per cent reduction by 2030 and a 79 percent reduction by 2050.”

“ For PM_{2.5}, compared to a 2013 baseline, a 26 per cent reduction is expected by 2020, a 34 per cent reduction by 2025, a 41 per cent reduction by 2030 and a 61 per cent reduction by 2050.’

5. 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?

Londoners need to move away from 'consumer' based approach to living to a 'sustainable' based approach. In order to do this obstacles to making these sustainable right choices need to be removed. This will require some financial incentive and funding for the infrastructure necessary.

Air Quality

1. Do you agree that the policies and proposals outlined will meet the Mayor's ambitions for air quality in London and zero emission transport by 2050? Is the proposed approach and pace realistic and achievable, and what further powers might be required?

The strategy states legal compliance can only be achieved if the London boroughs, government and others also play their full role and take ambitious action. The main responsibility for ensuring that compliance is achieved rests with government. They can use unique tools, such as control over fiscal incentives, which can accelerate compliance. The Strategy from the London Mayor's is one we support, but there is clearly a need for Government to take similar ambitious actions and Lewisham supports the introduction of a new twentyfirst century Clean Air Act to tackle pollution in London once and for all.

Due to higher tailpipe emission levels and because of previous policy that encouraged the purchase of diesel cars they are currently the highest contributor to road transport NO_x and PM_{2.5} emissions in London. As indicated in the Strategy there are major discrepancies between official emission measurements and real-world vehicle performance in urban environments.

The latest emissions standard for heavy duty engines (Euro VI), which includes on-highway verification, has started to alleviate these shortcomings. An example provided in the Strategy is that TfL has seen a 90 per cent reduction in NO_x emissions between Euro V and Euro VI buses.

On road verification for cars and vans hasn't been introduced yet, with legislation not taking full effect until 2021. This means some of the newest trucks on the road are expected to have emissions of NO_x and PM better than some family cars.

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Lewisham would encourage the introduction of independent testing, such as the Mayor's Cleaner Vehicle Checker, to help to alleviate this issue by creating transparency and improving consumer confidence and would support the Mayor's action in putting pressure on the government to deliver effective national incentives such as taxation and scrappage to discourage diesel while these vehicles remain more polluting.

The London Mayor's approach for moving to low emission strategy is supported by the borough and the policies that support phasing out all fossil fuels and accelerating the uptake of zero emission vehicles. A Low Emission Vehicle Strategy, is currently being developed by the Council, with an initial proposal to install EV Charge Points within 500m throughout the Borough. We are also working with TfL to bring forward rapid charging facilities on or close to the TLRN, and we are prioritising charge points on the A21 and A2 Low Emission Bus Corridor to maximise the impact on that corridor. The strategy states that going forward the Mayor will seek to integrate hydrogen technology into the zero and alternative fuels plan for London transport infrastructure, alongside electric. This is a normalisation phase which will support the development of mechanisms towards mass introduction and use of hydrogen fuel cell technologies. Lewisham would like the Mayor to engage with the Council on this as it develops and as it reviews its own Low Emission Vehicle Strategy.

Lewisham's endorses London Councils comments, particularly in relation to 'the development of zero emission freight vehicles through the combined boroughs' and Mayors' procurement power. The Mayor and boroughs should work together to trial new technologies. It is clear that more charging infrastructure is needed to support this. The Mayor needs to investigate whether he can leverage his own assets to help with the development of charging infrastructure for hydrogen and electric vehicles. We also welcome the Mayor's focus on adopting smarter practices and reducing freight movements through better use of consolidated trips. Freight trips becoming more efficient are essential, as well as the better provision for freight in new developments. ' Lewisham notes the Mayor's timescale for all heavy vehicles (greater than 3.5 tonnes) in GLA group fleets being fossil fuel-free from 2030 and its desire for the wider public sector, including London boroughs and the NHS to adopt similar dates.

Following timescales are included within the Strategy:

all taxis and private hire vehicles to be zero emission capable by 2033

all TfL buses to be zero emission by 2037

Lewisham supports the London Councils response and would welcome the Mayor to revisit these target dates, to bring the delivery forward.

In Proposal 4.2.1a it states: 'The Mayor will promote and prioritise more sustainable travel in London including walking, cycling and public transport, as part of the Healthy Streets Approach' Lewisham welcomes the Mayor's initiatives in a shift to more sustainable travel like walking, cycling or public transport throughout London. With analysis suggesting that three quarters of journeys now made by car could be done on foot, by bicycle or by public transport, Lewisham would want some strong communication strategy from the London Mayor in delivering this message and the public health benefits to a more active and healthy lifestyle.

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The headline aim in the Mayors Transport Strategy Vision is for 80% of all daily trips in London to be made by non-car modes. The Council agrees that, with growing concerns over air quality, and the need to provide new homes for Londoners in a sustainable way, a renewed focus on reducing car usage in London is required at the earliest possible time.

In Lewisham's response to the Mayors Transport Strategy the Council have stated that 'Setting aside the challenge of making developments fully car-free, removing a third of all existing car journeys is a challenge that cannot be met in Lewisham with the infrastructure proposals that are currently committed in the Strategy. The target is particularly challenging for areas towards outer London, and for Lewisham, it would require a substantially increased investment in public transport and cycling infrastructure than is currently identified in TfL's Business Plan.

For Lewisham, this would mean a commitment to better links between the north and south of the Borough, as well as better orbital links:

- a full extension of the Bakerloo Line Extension to Hayes;
- delivery of Lewisham's Rail Vision, including devolution and metro-isation;
- full delivery of the Lewisham Cycling Strategy, including A21 Cycle Superhighway;
- improved bus services across the south of the Borough, and;
- orbital as well as radial public transport links.'

On 20 September 2017, a motion was approved by Full Council setting out support for the full Bakerloo Line Extension to Hayes, and expressing disappointment at the missed opportunity of curtailing the proposal at Lewisham.

Public Transport is essential for the Council in being able to move residents away from car use, particularly South of the borough. In addition to improvements to NOx levels reduced car use will also have a greater impact on PM10 and PM2.5, as reducing the number of kilometres driven will reduce emission from tyre and brake wear as well as from exhausts. This strategy recognises the need to go beyond legal limits for PM10 and PM2.5 to meeting WHO guidelines by 2030.

This strategy has indicated that it is possible to deliver quick wins to improve both air quality and prevent climate change by adopting tighter PM2.5 limits. Given the health implications and benefits to climate change Lewisham supports the Mayor's commitment in reaching a WHO limit for PM2.5 by 2030. In saying the above however Lewisham is concerned that most recent analysis shows that sources outside London make the largest contribution to the estimated death risk from long-term exposure to PM2.5 in London as a whole. Clearly in order to meet the WHO guidelines negotiations with EU Nations on limits is necessary and as indicated in the strategy the EU National Emissions Ceiling Directive must incorporate tighter emission limits for countries across Europe to address transboundary pollution on a quicker timescale.

Finally the Mayor proposes (subject to the development of detailed proposals and consultation) that the ULEZ is expanded to Inner London by 2021 for light vehicles (cars, vans, minibuses and motorbikes), covering an area up to the North / South Circular. It is also proposed that by 2020 the ULEZ is expanded

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London-wide for heavy vehicles, which the strategy states 'will result in only an estimated one per cent of road length in Outer London remaining in exceedance of the NO2 limit values in 2025: primarily on the North Circular and around Heathrow (which is a matter for national policy).' It also states that the Mayor will 'keep the situation under review and consider what measures will be most effective and likely to secure equivalent compliance on those Outer London roads in the shortest time possible'. Lewisham has always argued for the extension of the ULEZ for light vehicles also to be London wide and would want this proposal reviewed again.

2. Do you agree with the Mayor's policies and proposals to raise Londoners' awareness of the impacts of poor air quality?

The Council is in agreement with proposals for raising Londoner's awareness of impacts of poor air quality, particularly providing timely air pollution information to vulnerable groups, such as schools, hospitals, GP surgeries and care homes.

There is a need to improve understanding of air quality health impacts but also to understand the limitations of monitoring equipment and how best to interpret and publish results. The Council welcomes the Mayor's proposal to offer guidance and advice on how air quality is monitored in London, with a focus to help people understand what type of equipment is available and establishing a process for accrediting monitors for different purposes. With the increase in community groups engaging in air quality monitoring across London, it would be helpful for the Mayor to provide some advice to these groups to assist them in understanding and interpreting data, particularly as stated below where he seeks to exploit new technologies and approaches such as personal and localised monitoring.

'Proposal 4.1.2b The Mayor will work with boroughs to safeguard the existing air quality monitoring network and enhance it by exploiting new technologies and approaches such as personal and localised monitoring.' As indicated in the Strategy, the London Air Quality Network is one of the ways in which local authorities play a crucial role in helping to understand and address air pollution. The high quality monitoring data helps to understand the long-term trends in air pollution and is used to validate the comprehensive pollution modelling provided by the Mayor through the London Atmospheric Emissions Inventory (LAEI). Additional funding however for the Council is required to continue the ongoing maintenance of these sites if, as the Mayor suggests, he wishes to protect them and particularly if they are to be enhanced. The Mayor identified particular areas of focus in increasing the number of long-term NO2 diffusion tube monitoring, especially in air quality focus areas. Another is identifying opportunities for additional PM2.5, black carbon and ultra-fine particle monitoring. The Mayor will work with boroughs and others to encourage innovation in monitoring. The Council welcomes initiatives for improved monitoring but this needs to be provided in a proportionate manner, given costs, particularly where there are high maintenance costs involved.

3. Do you agree with the Mayor's policies and proposals to safeguard the most vulnerable from poor air quality?

The Council does agree with this and is keen to work with the Mayor on proposal for safeguarding the vulnerable. The Council will be carefully considering its policy response as part of LIP3 and drawing up

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a pilot programme for healthy school streets. Through the Lewisham Mayor's Air Quality Campaign, approaches are being made to schools in appointing School Air Quality Champions and piloting some air quality recognition scheme for schools. The Council has been working with the TfL School audit scheme and would welcome this scheme being rolled out to all schools where air quality exposure for children is potentially high. Long term, there will need to be money made available to Councils for the funding of measures identified, to introduce actions that reduces exposure. The Council believes that improving air quality around schools is critical.

Also and as indicated in Q2 The Council is in agreement with proposals for raising Londoner's awareness of impacts of poor air quality, particularly providing timely air pollution information to vulnerable groups, such as schools, hospitals, GP surgeries and care homes.

4. 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)?

In principle we would support these emergency measures, but these can only be worked on through very close participation with the Council if ever was seen to be a requirement.

5. 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)?

Lewisham supports the development of a new enhanced website for management of Non-Road Mobile Machinery (NRMM) and the development of guidance for developers to ensure new large-scale developments in London are 'Air Quality Positive', although as detailed in the London Council's response we would like more information on how this would be introduced in practice and the impact on the borough work streams. It also supports policy to prevent emissions from energy production plant, including from CHP, that would exceed those of an ultra-low NOx gas boiler, in areas which already exceed legal air quality limits.

Given the growth in domestic wood fire burning the revitalising of smoke control zones and addressing wood burners through a new fit-for-purpose testing regime and information on appropriate technology/fuels for smoke control zones at point of sale is important and supported by the Council.

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

In, Proposal 4.2.3b 'The Mayor will work with industry and other partners to seek reductions in emissions from construction and demolition sites.' The strategy states that it is important to develop and share best practice to support and improve the measures the construction sector already puts in place. Similarly, the understanding of how monitoring can be used on construction sites to inform the operators when additional measures are required must be improved. The Council is currently, through the MAQF, working on a Framework Construction Logistics Plan for the Evelyn Road corridor to specifically control the impact of Construction vehicle movements in the area on air quality. Construction traffic has a significant impact on air quality, particularly within Growth Areas. We are currently piloting a monitoring

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approach with Kings ERG as part of the project and would be happy to share good practice once it's run for a sufficient period.

Green Infrastructure

1. The Mayor's ambition is to make London a National Park City. What should the attributes of a National Park City be and what would we need to achieve for it to be considered successful?

We endorse the London Councils response and support efforts to make London a greener city, but the Mayor's ambition to make London a 'National Park City' lacks detail about its practicalities. The London boroughs need to have clarity on how this initiative would impact on their work (not only their parks and open spaces functions, but also their planning, place and community functions). We want to understand whether being a National Park City will place any expectations on boroughs. The reality of being a major urban centre and the Mayor's priority to build more homes need to be balanced against the National Park City concept.

2. 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?

Given the different levels of jurisdiction in this area across London, the sharing of information is key to effective management and planning of green spaces, especially when space is such a precious commodity. Focusing on effective communication is important if the Mayor wants over half of London to be green by 2050.

3. Do you think the proposed policies and programmes will ensure London's important wildlife is protected and enhanced?

The distinction between 'green spaces' and 'good quality green spaces' (for example spaces high in biodiversity, habitat opportunities and providing resilience to flooding) needs to be central to London's green infrastructure plans. Knowing the many benefits that green spaces can bring, talking about the total area of green space is insufficient as this may not realise these many benefits. The quality of a green space drives the benefits it offers and accessibility to the public should be part of this. As local authorities continue to face increasingly difficult financial situations, the fact that parks are non-statutory responsibilities means that there is the potential for the quality and maintenance of parks to decrease over time as revenue resources are reduced. This is a major risk that has not been acknowledged by the Mayor.

We supports the policy to protect a core network of nature conservation sites and ensure a net gain in biodiversity, but the Mayor needs to provide more detail on a number of proposals. This includes explaining how the network will work in practice, and how it will impact on London boroughs, as they play a significant role in managing much of London's green space.

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The inclusion of Sites of Importance for Nature Conservation (SINCs), and the promotion of wildlife friendly landscaping in the new London Plan are both welcomed in principle. However, it is not known how these proposals will work in practice. A recurring theme throughout this response is the fact that the enforcement capacity of many of London's boroughs are already restricted, and further policies of this nature would need to reflect that fact. It would be welcome to see the Mayor commit to using his enforcement powers to support the boroughs in this endeavour.

The Council believe that planting the right species of tree for the location will have the net effect of lowering maintenance liability especially if these trees are targeted on soft areas of ground (i.e. not pavement) and also if the promotion of planting is extended to private landowners as a mean of creating the desired canopy cover.

4. Do you think the proposed policies and programmes will be effective in increasing London's tree canopy cover?

We endorse the London Councils response that this is a positive addition to the strategy, but the Mayor should also ensure that within this policy, there is an acknowledgement that different types of green infrastructure have different roles, and the different options available (including the most appropriate tree species depending on its location).

Lewisham Greenscene believe that planting the right species of tree for the location will have the net effect of lowering maintenance liability especially if these trees are targeted on soft areas of ground (i.e. not pavement) and also if the promotion of planting is extended to private landowners as a mean of creating the desired canopy cover.

The Council principally support the aim 'For more than half of London's area to be green and for tree canopy cover to increase by ten per cent by 2050' and welcome the focus on good quality green space, however we believe that increasing tree canopy cover may not be the best indicator for this. Some street trees in particular have the potential to cause structural damage to buildings and consideration of the right tree, right location principles often means replacement programme will choose different and smaller species suitable for the specific characteristics of the road. In addition there are frequently issues around restrictions to planting availability because of underground services. The Council believe that planting the right species of tree for the location will have the net effect of lowering maintenance liability especially if these trees are targeted on soft areas of ground (i.e. not pavement) and also if the promotion of planting is extended to private landowners as a mean of creating the desired canopy cover.

6. How best can natural capital thinking be used to secure greater investment in the capital's green infrastructure?

The Council endorse London Councils response on trialing new ways of measuring, in addition to Greenspace Information for Greater London (GIGL) who collates and manages datasets on the type and composition of London's green infrastructure alongside data on habitats and species. The availability of data on the quality, functions and uses of London's green infrastructure is limited. With a new way of measuring this could help build up the financial case to invest in green infrastructure in London. The

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Green Infrastructure Taskforce report 'Natural Capital: Investing in Green Infrastructure' also highlights opportunities for greater strategic collaboration across the sub-regional groups in London on green infrastructure.

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

Climate Change Mitigation and Energy

1. 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?

Delivering on the target to make London a zero carbon city will take concerted action from the public sector across central, regional and local government, from the private sector and the community and voluntary sector and also from individuals recognising and responding to the need to take action. The draft strategy is primarily public sector focussed. There are good reasons for this, but the contribution that other sectors and individuals will need to make should be recognised.

2. 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?

The analysis in the strategy clearly identifies the need – and the challenge – of retrofitting existing building stock, at a scale of 100,000 buildings a year to 2050. This does not however seem to translate into the policies. Delivery of the ambition needs a transformation in the energy retrofit industry in London from funding, through to local engagement and delivery. It is not clear that the proposed actions match the level of ambition that has been described. It is recognised that the GLA cannot take on responsibility for delivering the level of transformation needed and this is reflected in 6.1.1c. But the GLA can and should be setting out the challenge to central government and also to London's local authorities and unless this happens London's inefficient housing will continue to consume energy and inflate carbon figures. This challenge therefore should come first and foremost and it should include London's local authorities.

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

The approaches to innovation, development of the supply chain and investment outlined in section 10 of the draft strategy could play a really important role here and it is important to make sure that although they are covered in separate sections that the Strategy emphasises this.

4. Please provide any further comments on the policies and programmes mentioned in this chapter,

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including those in the draft solar action plan and draft fuel poverty action plan that accompany this strategy.

The branding of different aspects of the GLA's approach to energy efficiency, carbon reduction and fuel poverty is unclear, particularly in relation to the focus and roles and responsibility of Energy for Londoners, RE:NEW and the Decentralised Energy Enabling Project (DEEP).

The Fuel Poverty Action Plan is welcomed although the detail is yet to be set out, particularly in relation to the £10m planned over the next 10 years. It is hoped that these new resources can be prioritised to fuel poverty, to help offset the imbalances created by the shortfall in Energy Company Obligation spend and help enable activity in boroughs where there is less capacity.

Proposed guidance or good practice on PRS enforcement and carbon offset funds are welcomed.

Waste

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

Yes. Pleased that it has been recognised that local authorities can only reach 42 per cent recycling rates and achieving 50 per cent and then 65 per cent recycling requires more recycling from businesses, schools and government organisations located in the capital.

2. 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?

Yes, Lewisham currently collect the 6 main materials and have just implemented food collection to 80,000 properties with the view of rolling this out further. Not sure whether the timescale is possible for some other local authorities.

3. Do you think the Mayor should set borough specific household waste recycling targets?

Yes, due to different challenges Councils have to face, including transient population, large number of flats and reduced number of gardens. Some LA's would have to achieve higher targets to cover those LA's that under achieve.

4. What needs to happen to tackle poor recycling performance in flats?

The Mayor needs to use a breakdown on types of flats when addressing flats recycling because it is hard to see an improved recycling services to flats. Focusing on flats where it is easier to reduce contamination, such as in converted houses and low-rise flats might be the place to start. However,

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boroughs are unlikely to be able to introduce food waste services into flats where they do not already exist by 2020.

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

The Mayor needs to support the efforts of organization that are currently active on issues relating to plastics and coffee cups.

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

The Council supports the policy: 'To make London a zero waste city. By 2026 no biodegradable or recyclable waste will be sent to landfill, and by 2030 65 per cent of London's municipal waste will be recycled zero waste to landfill' assuming that this refers to zero waste to landfill. Planning powers would need to be used to help achieve these targets for new builds. However, in order to achieve the 65 per cent target, we also need to work with the current stock and behaviour change needs to play a major role in this. More effort needs to be undertaken to reduce waste occurring and reuse materials as much as possible, as the waste hierarchy suggests.

Climate Change Adaptation

1. Do you think the Mayor's policies and proposals are sufficient to increase London's resilience to climate change?
2. Do you agree with the Mayor's policies and proposals to make Londoners, more aware of the risks of climate change, like overheating in buildings and flooding following heavy downpours?
3. Do you agree with the Mayor's policies and proposals to reduce water demand and leakages in London?
4. What do you see as the biggest opportunities to tackle climate change risks in London and how can the Mayor support this?
5. Please provide any further comments on the policies and programmes mentioned in this chapter.

The level of ambition is sufficient but the policies and proposals to deliver this are not currently commensurate with this. The Strategy sets out a number of areas where there are policy and delivery responsibilities which sit with other organisations but more could be identified – particularly with regards to the interface with the health sector, particularly Public Health.

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More detailed mapping and discussion of what climate change impacts will look like at a local level across London would be helpful to make it more tangible. Currently it's too nebulous for people who aren't engaged in the issue to understand and therefore to take action themselves, or look for organisations – whether in the public, private or community sectors – to take action.

Ambient Noise

1. Are there any other actions you think the Mayor should be taking to work with the boroughs and other key stakeholders to reduce noise?

There is a clear link between air quality and ambient noise, as both have road traffic as their main source. This is particularly the case when assessing improvements and links in mode shifts to reduce car use and more sustainable models of travel. The Strategy states: 'Streets make up 80 per cent of London's public space, so reducing the impact of road traffic noise has the potential to dramatically improve the experience of living, working and spending time in the city.' The GLA have provided Air Quality Focus Areas and although DEFRA have identified and mapped important areas it would be helpful for the Mayor to provide some consolidated mapping of air quality and noise in London. This will provide a greater understanding when modelling different scenarios with changes in vehicle types and numbers, as to overall environmental impacts.

The expansion of the EVCP infrastructure and development of hydrogen cell technology will facilitate the urgent change from use of conventional combustion engine for powering transport. This will not only deal with air quality (and discussed more fully in the Air Quality Chapter), but will also reduce noise. With reduced noise from the engine, the tyre/road interaction is likely to be the main noise source from road traffic. The average traffic speed in London is below 20mph. Low noise road surfaces have previously had more effect where speeds are higher. New advice in DMRB takes a conservative view of the benefits of quieter surfaces, and restricts it to a maximum reduction of 3.5dB. The Council would like the Mayor to research the lower noise material designed for noise absorption and provide detail on expected improvements to noise for typical speeds in London. There is clearly a need to provide some more research into benefits.

Smoothing flow of traffic, has an important role in reducing the noise impact. Also and as indicated in the Strategy less aggressive driving styles can decrease noise by 1-5dB (A) for cars and heavy commercial vehicles, and as much as 7dB (A) for motorcycles. The Council would like the Mayor to consider a campaign that promotes the importance on how people drive and to work with the Driver and Vehicle Standards Agency to include within the driver testing the need for a more passive form of driving and providing details on the benefits.

If TfL are publishing best practice guidance on noise mitigation for freight operators later this year, it would be useful to include this as part of the FORS recognition scheme so the guidance is incorporated within the industry. Issues of localised noise nuisance need to be considered where options of re-timing for delivery by moving trips from busy to quieter times, given the background noise levels will be lower and the potential localised impact would be greater, particularly in relation to L_{Amax} levels. In providing

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guidance there needs to be a commitment to using quieter technologies and methodologies and associated management of noise around residential roads for avoiding nuisance.

In Proposal 9.1.2b it states 'The Mayor will work with TfL to ensure new rail infrastructure uses technology that is effective at reducing noise'. There is an objective to enable mode shift by increasing the capacity of rail based services across London by at least 80 per cent by 2041. There is also the emphasis on the night time economy and providing the necessary public transport infrastructure. All of this will need to be done balancing the need for reducing the noise from transport. The Council welcomes the proposals but with the increasing capacity and use of public transport it is essential that technology is developed that reduces the impact of noise from rail. The Council would like the Mayor to initiate research and development of new technology in this area.

The strategy has stated: 'The Mayor requires noise issues to be addressed as part of all planned railway works and for steps to be taken that minimise the impact of works on neighbours. The Mayor wants suburban rail services to be devolved. This will help ensure integration of the provision of services and a more consistent experience for customers.' The Council has to deal with many complaints around maintenance works on rail and would support this devolution of suburban rail to the Mayor to provide a more effective means of managing the communication and resolution of issues and complaints, where works are often needing to take place at night.

The Council supports the Mayor's stance in resisting proposals for a Heathrow expansion until it can be shown that 'no new noise harm will result and the benefits of future regulatory and technological improvements would be fairly shared with affected communities'. The Strategy has identified this expansion could expose another 200,000 people to significant aircraft noise (at 55dB Lden), in comparison to a no expansion scenario. The Council welcomes the Proposal 9.1.2e 'The Mayor will continue to lobby to minimise the adverse impacts of noise from aviation'. The Council has noted the full responses to all the aviation consultations from the Mayor to date found at <https://tfl.gov.uk/corporate/publications-and-reports/aviation>.

The strategy states that the Mayor will minimise adverse noise impacts on local residents from construction on large and long-term building sites. It states that it will establish best practice guidance for noise produced by construction and demolition, and advice on noise management of construction activity. The Council would like to draw attention to the work carried out by the CIEH London Authorities Noise Action Forum (LANAF) Good Practice Guide. A Lewisham Council officer chaired the working group for the guidance and at the time the GLA was offered the opportunity of joining. The Council believes it would be a lost opportunity for the current Mayor if he didn't now consider adopting this guidance, details are found: <http://www.cieh.org/WorkArea/DownloadAsset.aspx?id=60404>

2. Do you think that the boroughs and the Mayor have sufficient powers to manage noise across London? If not, what additional powers are required and which organisation should hold them?

There is currently little powers available for control of ambient noise sources, particularly in relation to traffic noise. The strategy states: 'almost 2.4 million people are exposed to road traffic noise levels that are above those provided as a guideline by the WHO (55dB).' The development of actions within the

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Noise Action Plan for large agglomerations is unclear and would benefit from having more delegated powers to the London Mayor. The primary areas of ambient noise are from TfL owned roads so providing more controls and powers to the London Mayor will help with establishing and coordinating actions.

The existing London Plan states that the ‘management of noise is about encouraging the right acoustic environment in the right place at the right time – to promote good health and a good quality of life within the wider context of achieving sustainable development. Managing noise includes improving and enhancing the acoustic environment and promoting appropriate soundscapes.’

With respect to noise the WHO guideline of 55 dB(A) has been taken as a starting point for looking at the designation of quiet areas. Rather than having specific noise levels, it is more appropriate to provide some guidance on how relative tranquillity can be assessed and appropriate areas designated. The Council would appreciate the Mayor taking a lead on this as the existing nomination of ‘quiet areas’ in line with guidance from DEFRA needs reconsidering for London and should have a more overall assessment on tranquillity, considering the relative quiet particularly when comparing against people who live with background noise levels that are high. This can be incorporated within the Mayor’s Proposal 9.2.1a ‘Through the new London Plan the Mayor will consider policies that encourage boroughs to promote more quiet spaces across London’.

The Council supports Proposal 9.2.2a ‘Through the new London plan the Mayor will consider policies that promote the use of good acoustic design’ but agree with London Council’s response that any additional enforcement burden on boroughs must be taken into account at the policy development stage.

3. Do you agree with the Mayor’s policies and proposals to improve Londoners’ awareness of the health risks of noise?

The World Health Organisation (WHO) recognises environmental noise as the second largest environmental health risk in Western Europe behind air quality. WHO also identifies some groups as more vulnerable to noise. This includes children, chronically ill people, older people, and shift workers. In addition, the less affluent who cannot afford to live in quiet residential areas or to adequately insulate their homes, are likely to suffer disproportionately. The strategy indicates that despite this link, no London-based research has been completed to consider how noise impacts vulnerable groups. The Council would like the Mayor to action this research.

There are no specific policies or proposals within the Strategy for raising awareness of the health risk of noise. The Council would agree this would be important and would like clarity on how the Mayor proposes to do this.

Noise mapping data is available that can benefit society by informing individuals on how their choices will affect their health, and quality of life. The air quality data used for proposing less polluted routes for walking could incorporate noise data and provide a more unified map identifying the associate health benefits. This could also provide some benefits for promoting green spaces and the use of these areas.

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The Council would recommend that the Mayor contacts <https://tranquilitycity.co.uk/> who are working with Organicity to produce some form of map for people to explore areas of relative tranquility to walk and visit and provide some mapping for the community to encourage them in recognising the positive spaces and routes for reduced noise as well as other environmental benefits.

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

The existing London Plan states that ‘the management of noise is about encouraging the right acoustic environment in the right place at the right time – to promote good health and a good quality of life within the wider context of achieving sustainable development. Managing noise includes improving and enhancing the acoustic environment and promoting appropriate soundscapes.’ With the proposal for night time economy growth, and as detailed in this Strategy, it is important to understand and mitigate the noise of people coming and going between venues. In areas with a strong night time economy, quick and quiet exit routes for customers must be considered. These must take people quickly to transport stops and help direct them away from quieter residential areas. The Council would like some work carried out by the Mayor on providing good practice on the protection of acoustic environments around areas where night-time economy are being considered so providing effective management at the design stage.

