

# London Councils' TEC Executive Sub Committee

**Thursday 16<sup>th</sup> November 2017**

10:00am in Meeting Room 1, London Councils, 1st Floor,  
59½ Southwark Street, London, SE1 0AL

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## **Declarations of Interests**

If you are present at a meeting of London Councils' or any of its associated joint committees or their sub-committees and you have a disclosable pecuniary interest\* relating to any business that is or will be considered at the meeting you must not:

- participate in any discussion of the business at the meeting, or if you become aware of your disclosable pecuniary interest during the meeting, participate further in any discussion of the business, or
- participate in any vote taken on the matter at the meeting.

These prohibitions apply to any form of participation, including speaking as a member of the public.

It is a matter for each member to decide whether they should leave the room while an item that they have an interest in is being discussed. In arriving at a decision as to whether to leave the room they may wish to have regard to their home authority's code of conduct and/or the Seven (Nolan) Principles of Public Life.

\*as defined by the Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012

If you have any queries regarding this agenda or are unable to attend this meeting, please contact:

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**Declarations of Interest – TEC Executive Sub Committee  
16 November 2017**

Freedom Pass Holders/60+ Oyster Cards:

Cllr Phil Doyle (RB Kingston, Cllr Peter Buckwell (LB Richmond), Cllr Jill Whitehead (LB Sutton), and Cllr Caroline Usher (LB Wandsworth)

North London Waste Authority

Cllr Daniel Anderson (LB Enfield), Cllr Feryal Demirci (LB Hackney) and Cllr Claudia Webbe (LB Islington)

South London Waste Partnership

Cllr Stuart King (LB Croydon), Cllr Phil Doyle (RB Kingston) and Cllr Jill Whitehead (LB Sutton)

East London Waste Authority

Cllr Lynda Rice (LB Barking & Dagenham)4

Thames Regional Flood & Coastal Committee (RFCC)

Cllr Lynda Rice (LB Barking & Dagenham) and Cllr Daniel Anderson (LB Enfield)

Car Club:

Cllr Julian Bell (LB Ealing – Chair) and Cllr Feryal Demirci (LB Hackney) a

London Cycling Campaign

Cllr Julian Bell (LB Ealing – Chair)

London Waste & Recycling Board (LWARB)

Cllr Feryal Demirci (LB Hackney)

Wandle Valley Regional Park

Cllr Jill Whitehead (LB Sutton)

# London Councils' TEC Executive Sub Committee

## Response to the draft London Environment Strategy

Item no: 3

**Report by:** Owain Mortimer      **Job title:** Principal Policy Officer  
**Date:** 16 November 2017  
**Contact Officer:** Owain Mortimer  
**Telephone:** 020 7934 9832      **Email:** Owain.mortimer@londoncouncils.gov.uk

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### Summary

This report summarises the development process of the London Councils' draft response to the draft London Environment Strategy and seeks member approval for its contents.

### Recommendations

The Committee is asked to:

- Note and discuss the report and draft response to the draft London Environment Strategy at Appendix 1;
- Agree to submit the draft response to the draft London Environment Strategy as outlined at Appendix 1;
- Agree that if changes are substantial at the TEC Executive meeting, the Chair and Vice-Chairs will sign-off the response on TEC's behalf.

## **Background and response development**

1. On 13 April 2017 London Councils held a joint pre-consultation event with the GLA for officers and members to shape the draft Environment Strategy and policies contained within.
2. The draft London Environment Strategy was published on 11 August 2017. London Councils has taken care to give opportunities for boroughs to shape the draft response.
3. An event with the Deputy Mayor for Environment and Energy, Shirley Rodrigues and the lead strategy officers from the GLA was arranged for 6 September 2017. This provided an opportunity for officers and members to hear about the draft LES and discuss key issues.
4. London Councils officers have also attended a number of officer meetings and forums to capture issues that borough officers have raised. These include an engagement event for borough officers organised by the GLA on the London Environment Strategy on 19 October, a meeting with Shirley Rodrigues on the National Park City concept on 11 October, and a meeting of the London Environment Directors Network (LEDNET) on 4 September.
5. Our response drafting has been assisted by an officer Task and Finish Group which has met twice; once on 8 September and again on 30 October.
6. All borough officers have been invited to comment on two occasions as the draft has developed, between September and November.
7. Members were invited to comment on the draft response between 13 and 27 October. Comments have been incorporated into this final draft response attached at Appendix 1.

## **TEC meeting 12 October 2017**

8. Shirley Rodrigues, Deputy Mayor, attended TEC on 12 October 2017 and presented the draft LES. This was an opportunity for members to highlight key issues in response to the draft MTS.
9. Further comments can be provided by TEC members at the meeting, which will be incorporated into the final response.
10. If the changes are substantial, it is suggested that the final response be signed-off for submission by the Chair and Vice-Chairs of TEC.
11. The consultation formally closes on 17 November 2017. London Councils has been granted the opportunity of a short extension, if needed, following the discussion at TEC Executive. It is however necessary for the response to be submitted as soon as possible after the TEC Executive meeting to ensure borough views are taken into account by the GLA.

## **Recommendations**

The Committee is asked to:

- Note and discuss the report and draft response to the draft London Environment Strategy at Appendix 1;
- Agree to submit the draft response to the draft London Environment Strategy as outlined at Appendix 1;

- Agree that if changes are substantial at the TEC Executive meeting, the Chair and Vice-Chairs will sign-off the response on TEC's behalf.

**Financial Implications**

12. There are no financial implications to London Councils arising from this report.

**Legal Implications**

13. There are no legal implications to London Councils arising from this report.

**Equalities Implications**

14. There are no equalities implications to London Councils arising from this report.

# ► Draft Mayors London Environment Strategy

## ► London Councils response

London Councils represents London's 32 borough councils and the City of London. It is a cross-party organisation that works on behalf of all of its member authorities regardless of political persuasion.

### Introduction and key themes

The 32 London Boroughs and the City of London are the Mayor of London's key delivery partners for the London Environment Strategy. Boroughs manage and install green and blue infrastructure, enforce (environmental) planning requirements, are responsible for monitoring and improving air quality, provide waste management services to their residents, deal with noise complaints and are adapting to and mitigating against the risks of climate change, for example severe flooding.

London Councils welcomes and supports the ambitious and positive vision of the document. We have engaged significantly with our member authorities at both member and officer level to inform our response. We have used the format of the consultation questions to highlight a number of issues and suggestions and we welcome the opportunity to further work collaboratively on amendments to the draft LES and then on the implementation of this ambitious strategy. We welcome the integration of the previously separate strategies as well as with the other published draft mayoral strategies, specifically the Mayor's Transport Strategy (MTS) and look forward to seeing this repeated in the draft London Plan due to be published.

We have identified a number of key themes that have arisen throughout our consultation process:

1. The funding pressures that the boroughs, and other public organisations, currently face are high. We welcome that the draft LES recognises this in some areas, but find that this should be a key consideration across the whole draft LES. Boroughs, in many cases, are stretched beyond capacity. This has reduced borough staff capacity and is impacting on their ability to maintain services at current or improved levels. These constraints have manifested themselves in a number of areas:
  - i. Enforcement – boroughs often struggle to enforce certain standards, specifically in relation to planning requirements of developments;

- ii. Ongoing maintenance costs – many of the actions within the draft LES will have an impact on the boroughs' ongoing maintenance costs, for example regarding street trees as well as other green infrastructure.
2. We believe that the lack of costing for many of the targets is an issue. We ask the Mayor to provide detailed costings for the proposals in the draft LES, as setting out the costs is crucial to managing delivery and thus its overall success.
3. London Councils' recognises the benefits that using offsetting mechanisms can bring, but we should not view offsetting as a panacea that will get London to zero carbon, or increase biodiversity. They are an important part of the process, and when managed properly can provide boroughs with much needed funding, but given the capacity issues mentioned above, they are becoming increasingly difficult to implement.
4. We welcome the Mayor's commitment to developing a low carbon circular economy, but feel it could be woven throughout the different sections of the draft LES a little more effectively. For example, in relation to encouraging use of more appropriate materials in supply chains and increased use of reverse-logistics.
5. We feel the Mayor should use his influencing and convening powers to lobby central government for further funding and devolution of powers to London to ensure that the capital can achieve the aims set out in the draft LES.
6. Environmental legislation set by the EU will have to be reviewed following Brexit. London needs to continue to target at least the current environmental standards. Brexit offers the opportunity to go beyond EU limits and aim to achieve World Health Organisation targets for example. London will need to take a leadership role, using all of its collective power to shape the policies that emerge following Brexit.



## Chapter 2 - Transforming London's Environment

- Q1. Do you agree with the overall vision and principles of this draft London Environment Strategy?**
- i. **Improving lives and reducing inequalities – action is required across different policy areas to provide solutions to environmental challenges. This strategy makes connections with other Mayoral strategies to prioritise fairness in the access and use of the environment.**
  - ii. **Leading by example – the Mayor and wider GLA group should lead by example. Organisations like Transport for London (TfL), as well as organisations the Mayor has oversight of, such as the Metropolitan Police, can set examples and use new technologies.**
  - iii. **Avoiding negative impacts on other policy areas – a single focus on one policy concern shouldn't lead to a negative impact on another.**
  - iv. **Learning from international best practice – London should be a global leader on the environment. This will require collaboration with leading climate change and environmental institutions and other world cities, sharing ideas and learning from best practice.**
  - v. **Moving beyond business as usual – rather than just minimising the worst impacts of future change, this strategy aims to protect and improve London's environment.**
7. London Councils supports the overall vision and principles as set out above. We welcome the connections made between the different chapters and with different Mayoral strategies. We make suggestions throughout this response where we believe the connections could be strengthened.
8. The draft London Environment Strategy (LES) 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 and our response to the specific chapters will set out our position in more detail.
9. The main area of contention in the draft LES relates to waste. Some of these key milestones may be problematic to London Councils, given the increased burden they place on local authorities, without additional financial and administrative support. We support the aims of the draft LES in principle, but for instance, the waste targets could be very difficult to achieve given the London borough's current financial and capacity struggles. The Mayor has said that only a 42/43 per cent recycling rate is achievable by the boroughs, and it is not clear how the 65 per cent target will be reached. There is a lack of evidence base to show it is possible and we would welcome further modelling on this.
10. The financial and service pressures facing London local government are significant. The Spending Review (SR15) set the parameters of the public finances and related changes to public service delivery for the period 2016-17 to 2019-20. The past 7 years have seen unprecedented funding cuts to the sector with core funding from government falling by 50 per cent in real terms: a trend that will continue with a further 26 per cent reduction over the next three years. London's population is growing twice as fast as that of the rest of the country. The twin pressures of cuts to funding and the challenge of meeting rising demand for services will become far harder for London local government to address, as the "easier" efficiencies become exhausted. We estimate that, in total, London Boroughs face a funding shortfall of at least £1.5

billion by 2020. London Councils analysis indicates that core funding from central government will have fallen by 63 per cent in real terms over the decade to 2019-20.

11. We consider that the principles in the draft LES do not give enough of a focus to deliverability. For example, the LES accepts that national policy is weak in some areas and that funding constraints exist at local authority level, so we believe that there should be a consistent principle that the Mayor will use his influence and leadership to lobby national government in collaboration with boroughs to secure more funding to bridge the gap that exists. London Councils urges the government to continue to deliver on its commitment to devolution and to address the major risks to the viability of local services that funding cuts have brought. London has unique governance arrangements and so devolution must necessarily be advanced through a partnership between the boroughs and the Mayor. London needs both the ability to fund and manage services in different ways from other parts of the country, and has the capacity to do so.
- Q2. 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 business) and what should the priorities be?**
12. Following the delayed publication of the government's national air quality plan, the 25 year plan for the environment, and clean growth plan we believe that central government needs to do much more. This includes setting long-term national policy frameworks, for example in energy efficiency and air quality, which provide certainty to the market. There is also a need for improved financial support in areas that have been underfunded for a number of years. This is essential if London, and the rest of the UK, is to meet a number of legal obligations, such as on decarbonisation and air pollution, as well as the draft LES' stated ambitions. The Mayor has shown great leadership on areas where the government has been silent, for example on domestic energy efficiency retrofitting and decarbonising the energy system. London Councils welcome the Mayor's proactive approach in discussing these difficult issues, and urge the Mayor continue to lobby the government on key areas outside of his control, like decarbonisation. London Councils has previously supported the Mayor's lobbying of central government on a number of environmental matters, including the introduction of a new Clean Air Act.
13. Businesses and individuals are also important as many of the proposals require the behaviour change of individuals to be successful. Behaviour change campaigns will be an important aspect of achieving many of the aims in the draft LES. The efforts of boroughs on areas such as encouraging people to walk and cycle more and recycle more effectively should be supported.
- Q3. Do you agree that this draft London Environment Strategy covers all the major environmental issues facing London?**
14. We feel that the document covers the vast majority of the environmental issues that London faces. We welcome the Mayor's acknowledgement that London cannot reach the zero carbon target alone, and the willingness to engage central government and other stakeholders on this issue. This will also be essential if a number of the other areas are to be met.
15. The draft LES does not mention non-native invasive species and the impact of this on biodiversity in London. This issue creates unique challenges, in the capital, noticeably with regard to climate, habitat and overall land use and can be expensive to address, especially in dense urban areas such as London.

16. The plan does not mention light pollution but does cover ambient noise. Policy on addressing light pollution would be crosscutting as it would help biodiversity and reduce carbon emissions. Artificial light has a major impact on bird migration, insects and nocturnal mammals.
- 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 progress against this integrated strategy?**
17. In relation to air quality, the reduction in pollution should be picked up by the existing air quality monitors across the city. Improving the density of this network would provide more granular data. However we are very aware that this is dependent on additional costs. The draft LES includes providing better information to the public on air quality; whilst something we support we flag that knowing whether this has been effective would be difficult. We suggest the Mayor could introduce the following KPIs for air quality :
  - i. The percentage of air quality monitoring stations that meet the legally required levels of air quality;
  - ii. Number of schools located in areas of air quality limit exceedances. This can be measured using the next and subsequent iterations of the London Atmospheric Emissions Inventory (LAEI);
  - iii. The percentage of air quality monitoring stations in operation and the number of new sites installed. This will have a cost implication for boroughs if target set at an unrealistic level;
  - iv. The percentage of the bus and taxi (including PHV) fleet that is zero emissions;
  - v. Health data – for example hospital admissions and/or deaths as a consequence of air pollution;
  - vi. The Mayor could conduct regular public polling on air quality issues in London, using it to measure the public's awareness to the issues and the impacts it has on Londoners' lives.
  - vii. **No net loss of biodiversity;**
  - viii. The reduction in emissions from transport should be fairly straight forward to measure, but the Mayor and TfL will need to constantly monitor the actual emissions from the transport network as his policies are implemented, broken down to source type, such as buses, taxis, private hire vehicles, private vehicles, freight and Non-Road Mobile Machinery (NRMM).
18. There is a notable lack of targets over the Mayoral term within the carbon section. We support the proposal for a Carbon Budget approach and consider that the proposed 1<sup>st</sup> Carbon Budget to 2022 should have been developed before defining the policies and programmes. This would have provided a sounder evidence base for the required progress to 2022 and allowed for stronger KPIs.
19. The success of a city's resilience can be measured against a reduction in the number of emergencies due to extreme weather events, such as excess winter deaths, heat related deaths, flooding damage, and water scarcity. The speed with which the city can respond to an incident and return to normal is also an indication of its resilience.
20. Reducing the number of people adversely affected by noise will require regular measurement of noise levels at designated quiet areas. Sensors and smart digital infrastructure can enable this data to be gathered more easily over time.

**Q5. What are the most important changes Londoners may need to make to achieve the outcomes and ambition for this strategy? What are the best ways to support them to do this?**

21. The way Londoners use resources is essentially the biggest change that needs to be made. This can be affected by certain policies, such as energy efficiency and recycling services. The public need more information and transparency about the impacts their choices have (for instance on choosing energy suppliers), and change needs to be as easy, and have as minimal a negative financial impact as possible. Behaviour change across London will be needed to address many of the key challenges covered in the draft LES, and campaigns to influence behaviour should be utilised extensively.
22. The Mayor should also lobby central government to do more on developing policy frameworks to assist with the transition to a low carbon circular economy.

## Strategy Aims

**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:**

**Q6. 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**

23. The Mayor has shown good leadership on the issue of improving air quality in London, and we support this aim. The draft LES effectively links with the draft Mayor's Transport Strategy (MTS), clearly laying out the Mayor's policies and proposals in how he plans to tackle the issue. But we feel the crucial role the boroughs play needs to be reflected more; as does the fact that they need more support in this endeavour. We are disappointed not to see reference to the Go Ultra Low City Scheme in the draft LES and MTS given the boroughs, TfL and the Mayor are working jointly on this. We want the final LES (and MTS) documents to include recognition of charging points for car clubs and autonomous vehicles as well as for residential charging. We welcome acknowledgement that an increase in charge points will have impacts on London's energy demand, but the document does not set out any specific action on this. We would welcome a commitment from the Mayor to host, coordinate or facilitate a number of technology trials with the view of informing future adoption. This issue is closely related to that of parking in London, and encouragement to prioritise parking for car clubs and Ultra Low Emission Vehicles (ULEVs) will be important as London looks to decarbonise and clean its dirty air.
24. Brexit is an opportunity for the UK to introduce stronger air quality targets. We will work with the Mayor to help lobby central government for this, as well as identify areas that London can implement more stringent measures.
25. We want the Mayor and TfL to commit to working with any London borough, central, inner or outer, that wants to deliver a zero emission zone sooner than targeted. We feel the supporting text on page 99 needs to make reference to regulatory and potentially legislative changes that are needed for zero emission zones.
26. We want to see the Mayor and TfL go further and faster on a number of the targets set out. We believe 2037 is not soon enough for all buses to be zero emission. The technological advancements seen in recent years mean we think this target could be achieved sooner.

**Q7. For more than half of London's area to be green and for tree canopy cover to increase by ten per cent by 2050**

27. We principally support this aim and welcome the focus on good quality green space. However increasing tree canopy cover may not be the best indicator for this. Some street trees have the potential to cause structural damage to buildings and will need replacing with sometimes different and smaller trees. Additionally, the crucial role of local authorities in achieving this aim is currently underplayed and will likely require significantly increased resources relating to the planting of green infrastructure as well as ongoing maintenance. The KPIs in the draft LES are focused on area not quality, we would welcome the development of some basic elements to good quality green spaces that can be measured against a baseline of what is already there.
28. As we discuss in more detail in our response to Chapter 5, we want to state that tree canopy cover on streets can cause pollution to be trapped so is not necessarily always good for air quality (we need the right tree in the right place). The problem of trying to enhance canopy cover while allowing offsetting for developers is that there will be more pressure on planting street trees as part of an offset, which may not be the best green infrastructure intervention for air quality and biodiversity in every context.
29. Private gardens cover 24 per cent of London's land and policy efforts to ensure that private gardens, front and back, remain or become green rather than being paved or turfed with artificial grass, would support a number of objectives. It would contribute significantly to reducing the impacts of surface flooding through sustainable drainage (SuDS), encouraging wildlife and improving the connectivity of London's green spaces. We believe that the National Park City concept and the opportunities it provides to engage with the public could provide a useful tool to educate the public on these sorts of issues.

**Q8. For London to be a zero carbon city by 2050, with energy efficient buildings, clean transport and clean energy**

30. London Councils supports the aim for London to be a zero carbon city by 2050 although we acknowledge how difficult it will be for this to be met. The Mayor's own projections show this is not quite being met with the proposed policies (Figure 32, page 193). A focus on retrofitting buildings in the 'able to pay' sector should be introduced into the draft LES, as, while tackling fuel poverty should be a central pillar of any energy efficiency strategy, the majority of homes in London are not in this bracket. The Mayor should make a firm commitment to lobby central Government to introduce a national energy efficiency policy to replace the Green Deal that would provide London with its fair share of funding.
31. There needs to be more work on decarbonisation of heating in London. A broad mix of different technology solutions will be needed to do this, including heat pumps (ground and air source), utilising waste heat more effectively, fuel cells, and potential use of low carbon/renewable gas. London should learn from the H21 Leeds City Gate project and investigate the potential for the provision of hydrogen gas in London for heating. This could be combined with the planning for a zero carbon transport network as the transport system will need a combination of infrastructure for vehicles powered by both electric and hydrogen as different fuels are likely to be more appropriate for vehicles that operate in different contexts and for different purposes.

**Q9. 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**



32. We believe that the Mayor should clarify the term 'zero waste' in more detail. The term could mean zero waste arising (i.e. everything re-used, nothing to recover, recycle or dispose) or zero waste to landfill. In our response, London Councils has assumed that zero waste refers to zero waste to landfill, although we would welcome an ambition for London to be a city that is zero waste (arising) in the future.
33. For London to become a zero waste city is a worthy ambition, but will be incredibly challenging in today's context, and some of the targets set out will be difficult for local authorities to achieve in practice, despite their support for such aims in principle. More funding will need to be made available to boroughs for this to happen, particularly as they will be required to introduce food waste collections to achieve this target. We wish to highlight the planning powers at the Mayor's disposal and how these can be leveraged to help achieve these targets for new build properties. However, in order to achieve the 65 per cent target, boroughs will need to improve recycling rates from people living in existing housing stock and behaviour change needs to play a major role in this. The 65 per cent target is the Mayor's target for municipal waste, and we want to emphasise that there should be no implication that the boroughs are responsible for this. We welcome GLA recognition that London's waste authorities can only achieve 42-43 per cent recycling of household waste, in line with WRAP modelling undertaken for Resource London. The gap between the two will be delivered by commercial waste collections and London Councils wants to see more detail on how the Mayor will mobilise this sector and secure the data reporting he needs to identify whether the target has been met.
34. An accelerated transition to a circular economy is essential if London is going to become a zero waste city. London doesn't have any direct powers in relation to the circular economy but can become a testbed for new schemes and technologies to encourage the shift. We welcome the specific focus in chapter 10 (Transition to a low carbon circular economy) on engaging with key stakeholders to make this happen.
35. The aim to have no biodegradable or recyclable waste sent to landfill by 2026 is also a good target; however there are a number of challenges to achieving this, such as encouraging residents to separate waste more accurately and the cost effectiveness of separation for recycling and treatment compared with the cost of disposal. We suggest the Mayor should set out some intermediary steps of how to get there.
36. We also want to highlight that more effort needs to be undertaken to reduce waste occurring and reuse materials as much as possible, as the waste hierarchy suggests.
- Q10. For London and Londoners to be resilient to severe weather and longer-term climate change impacts. This will include flooding, heat risk and drought.**
37. City resilience is about a number of different factors. It includes making buildings, public spaces, and critical infrastructure resilient to extreme weather events such as flooding and increased heat; as well as being concerned with the resilience of individuals and society to respond to these incidents. We welcome the Mayor's focus on information sharing and educating individuals on how to live more sustainably and how to act in times of difficulty (for instance during periods of extreme heat or cold). We welcome the Mayor's multi-sector focus on improving the resilience of the city. This will be essential to addressing the different challenges seen by businesses of different sizes, vulnerable people like the elderly and children, and fuel poor households. We would call on the Mayor to encourage through his planning powers the use of rainwater harvesting on all new developments, domestic and commercial, to reduce the demand for water and London's water scarcity. The focus on data gathering and modelling is important, but we

believe that there should be a commitment to improved data sharing in relation to resilience and that data is made as widely available as possible.

**Q11. To improve Londoners' quality of life by reducing the number of people adversely affected by noise and promoting more quiet and tranquil spaces.**

38. The impact noise can have on people's wellbeing cannot be overlooked and London Councils supports the Mayor's aims in relation to noise. The shift to electric vehicles will be a big contributor to noise reduction from traffic, although LGVs and HGVs are more difficult to electrify. We feel this could be a very difficult outcome to quantify so would welcome more information from the Mayor on how this might be done.

## Chapter 4 - Air Quality

**Q12. 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?**

39. The Mayor has shown good leadership in focusing on improving air quality in London and the ambitions in this chapter of the draft LES is welcomed. In relation to transport, we support the approach being taken, including that taken in the draft MTS which links well with the draft LES. We have a number of comments to make on the proposals, which we set out below.
40. The London Local Air Quality Management (LLAQM) framework should not become more onerous on the boroughs. We welcome the Mayor's acknowledgement of the work that boroughs are already doing to improve air quality in their areas and also welcome the commitment to support the boroughs in this work.
41. London Councils supports the focus on modal shift and feel that the benefits of modal shift to more sustainable transport modes have been made clearly in the draft LES and MTS. Despite this, we do believe that there needs to be recognition in the draft LES and MTS of the need for concerted effort to achieve this in outer London where there can be a lack of adequate public transport and infrastructure to support walking and cycling. This is a really important part of the modal shift, and will be crucial to improve air quality in outer London areas where there is high levels of pollution. We feel that further work is needed around public engagement to encourage greater numbers of people to choose to walk, cycle and use public transport as opposed to drive, where appropriate. The public transport offering will need to significantly improve in some areas, particularly outer London in terms of reliability, frequency and sustainability. Recent public polling by London Councils shows that 35 per cent of respondents cycled either as part of their commute or for leisure, and that nearly half of Londoners would be willing to walk or cycle more to improve air quality. But a quarter of those who do cycle said they don't feel safe, and 40 per cent of Londoners said they would be encouraged to cycle if there were less cars on the road, and 33 per cent said more dedicated and segregated cycling infrastructure would encourage them.
42. We support the action that the Mayor is currently taking on reducing emissions from the bus fleet, although we question whether this could be done quicker. 2037 is a long time away, especially since TfL usually tender for 5 year contracts, with a potential 2 year performance related extension available to the operator. Also taking into account the impact that buses have on air pollution in London (they contributed 35 per cent of NOx from road transport in 2013 according to TfL figures) we see it as vital that they are cleaned up as soon as possible. London could be a real driver for new technology in this area, and we would welcome the Mayor re-visiting this target.
43. This sentiment is echoed with the action on the taxi and private hire fleet. The target is only for the taxis to be zero emissions capable (ZEC) by 2033, which is too far away. London Councils views the current 15-year age limit on taxis as unacceptable, as it allows diesel taxis bought this year to still be polluting London's streets up to 2032. Currently emissions and age requirements on private hire vehicles (PHVs) are much higher; while this is understandable given the wider range of models available for use as PHVs, we do not believe that black cab taxis should be subject to less stringent regulations.



44. Action on private and commercial vehicles is essential to London becoming zero carbon by 2050. We feel that the boroughs should have the ability to meet the end goal of zero carbon in the most appropriate way for their area. This will also need to be done in a way that does not disproportionately impact on those on the lowest incomes. It is important to note that moving to zero carbon only refers to the tailpipe emissions, and that the energy generation will continue to produce carbon emissions for some time. London needs to introduce smart energy systems alongside an increase in the production on renewable energy. We also question whether these targets could be more ambitious in terms of renewable power generation and reducing emissions from fossil fuel vehicles. The UK government recently announced plans to stop the sale of new petrol and diesel vehicles by 2040, although this only refers to light vehicles and does not include hybrids. This is a step in the right direction, but as the situation in London is much worse than the rest of the country, a stricter timeline would be welcomed.
45. Car use reduction is essential in London. Neither the boroughs nor the Mayor currently possess the power to ban certain vehicles from the roads London Councils principally supports road user charging where it can be done fairly with much borough involvement in the design and implementation and it is proven to support policy aims, such as reducing pollution, encouraging more walking and cycling or financing transport infrastructure and maintenance. Any new road user charges should be hypothecated to walking, cycling and public transport improvements so that residents can clearly see the benefits and charges avoid being seen as another way to raise revenue by councils. Our response to the draft MTS provides more detail on this topic.
46. The Mayor makes the commitment in the draft LES that all Heavy Vehicles (over 3.5 tonnes) will be fossil fuel free by 2030. We welcome this target by question why it is not in the draft MTS. We seek greater clarification around this point.
47. London Councils has previously stated its support for the Central London ULEZ being implemented in 2019. A formal position on the expanded Inner London ULEZ by 2021 will be developed with the final round of consultation on the ULEZ towards the end of 2017.
48. We welcome the Mayors proposal to work with boroughs to explore “borough level restrictions on fossil-fuel vehicles”, such as diesel surcharges. We also support the introduction of the ‘cleaner vehicle checker’ and would hope this is promoted widely to businesses and the public, and developed over time to ensure it remains useful and up to date.
49. The implementation of local zero emissions zones is an interesting, and potentially important proposal. This work will need to be led by the boroughs, and the Mayor should work with any who are interested to start developing these ideas. We welcome that the Mayor is starting to develop a long term action plan around air quality. We therefore welcome principally the central London zero emission zone, although more details will be needed in due course. Congestion reduction is an important aspect of improving air quality in London, so there needs to be a stronger focus on reducing car ownership both in the draft MTS and LES. We suggest that a stepping stone to achieving less car ownership is the introduction of car sharing models, particularly in outer London.
50. London can be a test bed for the development of zero emission freight vehicles due to 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. The Mayor should use his convening power to engage with businesses and help plan freight journeys more efficiently.

51. The draft LES discusses adopting smarter practices in the freight sector in relation to reducing air pollution. One opportunity could be to develop reverse-logistics arrangements (i.e. the same trucks delivering goods and taking away recyclables). There are legal requirements, such as being registered waste carriers, but we suggest this is not insurmountable for the industry.
52. The Mayor needs to work with the relevant authorities and organisations to reduce the emissions from non-road transport sources, such as river transport on the Thames and other waterways.
53. We support the development of a new enhanced web site for management of Non-Road Mobile Machinery (NRMM) and believe that existing control of NRMM through the planning system needs some refinement. Boroughs should be involved in the development of an improved scheme.
54. London should aim for the safe levels of air pollution as set by the EU as a minimum, but have a long term view to reaching the levels set out by the World Health Organisation (WHO), which are more stringent for Particulate Matter (PM). We therefore support the Mayor's commitment to reaching WHO limits for PM2.5 by 2030. Additionally, in geographical terms we should aim for the whole of London to meet these levels at all times with the area around Heathrow being a significant outer London location with notably poor air quality. This will require support funding for the boroughs to upgrade the necessary monitoring stations as a recent Ricardo Energy & Environment report for the Scottish Government shows that the expansion of the PM2.5 network is likely to be a costly exercise<sup>1</sup>.

**Q13. Do you agree with the Mayor's policies and proposals to raise Londoners' awareness of the impacts of poor air quality?**

55. It is important to have ongoing refinement of London Atmospheric Emissions Inventory (LAEI) as new evidence about emissions emerges, whilst ensuring it is still able to be used to measure progress. We particularly support the addition of information on Combined Heat and Power (CHP) plants.
56. The air quality monitoring network that exists in London is one of the most extensive in the world, but it needs to be maintained and we welcome the Mayor's recognition of this and willingness to continue to support this. Additional funding may be required to ensure the network remains as comprehensive as it currently is. In terms of personal air quality monitoring, it will be important to educate individuals on the technical limitations and correct use of air quality monitoring tools, and the related benefits and disadvantages to ensure that expectations are managed. With this in mind, one suggestion could be for the GLA to implement a process for accreditation of monitors for different purposes.
57. We support the Mayor's plans to reduce indoor air pollution through engaging with stakeholders and awareness-raising. Sharing information and building awareness amongst the public of air

<sup>1</sup> [http://www.scottishairquality.co.uk/assets/documents/technical%20reports/Scottish\\_Government\\_pm2-5-network\\_final\\_version\\_Approved.pdf](http://www.scottishairquality.co.uk/assets/documents/technical%20reports/Scottish_Government_pm2-5-network_final_version_Approved.pdf)

pollution events is necessary to reducing their impact, as individuals will be empowered to take action.

58. In relation to ambient air pollution the capital wide alert system is welcomed, and we feel that this could also be amended to include information prior to an expected event where possible. This is with the acknowledgement that forecasts of high pollution events are available only a few days before they occur, it would still be very useful to the public and agencies affected, for example health authorities.

**Q14. Do you agree with the Mayor's policies and proposals to safeguard the most vulnerable from poor air quality?**

59. Providing more information to those exposed to poor air quality is an important way to help change behaviour. It is important to consider how this action can be measured to ensure effectiveness. We would like more information on how the Mayor will work with other partners to spread the necessary information to the most vulnerable people. He could make use of the borough public health network. We also seek clarity around what 'emergency measures' constitutes – it is likely it would require close collaboration with the boroughs (as well as other stakeholders) to be effective.
60. Improving air quality around schools in London is absolutely critical given the serious health impacts air pollution has on children. The schools audit programme needs to be coordinated more effectively, and should be evidence based and relevant. As it currently stands the Mayor performs the audits, but the boroughs (or relevant authority if an academy or independent school) have to carry out the improvement measures. A more holistic approach to this system should be developed in collaboration with the boroughs that goes all the way from joint-audit to joint-implementing any necessary changes. There needs to be a recognition that there is limited action that boroughs can take for schools that are near busy Transport for London Road Network (TLRN) road(s). It would be useful for any learning from the school audit project to be shared with all of the boroughs.
61. There are a number of good examples of work that the boroughs have been conducting in this area, including: anti car idling events outside schools, holding car free days with a number of schools, pupil route planning, installing 'green screens' in front of schools, implementing school travel plans, installing living green walls at schools (which is also an example of improving biodiversity and resilience), and participating in community engagement and education campaigns.
62. London Councils believes that the Mayor should work with the boroughs to develop new proposals to be included in the London Plan that ensure that new schools, housing and care homes are not built in places with poor air quality, or that mitigation measures are undertaken if they are. This would help to reduce the number of people exposed to poor air quality by utilising the design process of new development.

**Q15. 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)?**

63. We support these emergency measures in principle. The boroughs are held accountable for the air quality in their areas, but, while having control of approximately 95% of the road network, they do not have control of some of the most polluting roads. We welcome much of what the Mayor has proposed in his draft MTS, but there needs to be a greater recognition of the

contribution of air pollution from the TLRN and Highways Agency roads. This is important as many of these roads are through routes, and the boroughs have no way of influencing their use. This links back to road pricing. The Mayor needs to continue to show leadership in this area and commit to action on TLRN roads to reduce air pollution. This could begin in a focused way, for example the dirtiest roads that are near schools. TfL should commit to conducting a network-wide review to establish the best course of action on their road network during periods of high air pollution. Closing busy strategic roads could in some circumstances result in more pollution as more cars are forced onto smaller roads causing increased congestion so these impacts will have to be planned and managed with the boroughs in advance.

**Q16. 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)?**

64. The Mayor should look to trial and encourage the rollout of zero emission construction equipment, such as electric diggers. We would welcome more detailed plans for how and where this could be done.
65. London Councils welcomes the commercial boiler scrappage initiative and believes it should be widely promoted. Further information on this should be provided to the boroughs so we can promote this scheme to borough businesses.
66. Reducing emissions from large scale generators in commercial buildings is an important issue, especially as more generators are installed across London to provide electricity backup to businesses such as data-centres. We strongly support the development of suitable retrofit solutions for existing generators as the current regulatory framework for controlling generators is incoherent. The Environmental Permitting (England and Wales) Regulations (2010) provides a mechanism to control emissions from plants above 20MW by the local authority and by the Environment Agency if over 50MW. Most generators installed in London tend to be below this capacity. The Medium Combustion Plant Directive (MCPD) needs to be transposed into UK law by December 2017. This will allow the control of emissions for plants over 1MW, eventually - the emission limit values set in the MCP Directive will have to be applied from 20 December 2018 for new plants and by 2025 or 2030 for existing plants, depending on their size. This will leave a lot of generators which are usually gas or diesel powered continuing to be used for a long time. However, this regime may be ineffectual for tackling generators as they only operate intermittently so may fall outside of its control.
67. Planning enforcement is crucial in ensuring new developments meet air quality standards. London needs stricter planning criteria in the new London Plan – this would help combat the reduced capacity of boroughs in this area as it would provide teeth and allow for boroughs to assert more pressure on developers to meet their environmental obligations. The Mayor needs to place a greater importance on environmental criteria, for instance air quality measures and greening, in the forthcoming London Plan to empower boroughs to enforce this more effectively.
68. Increasing planning fees, as has been proposed by the Government, will assist local planning authorities being able to attract and retain high quality staff which will lead to an increase and acceleration in development. However, the level of the fee rises suggested in the white paper will not address the entrenched difficulties experienced by London's boroughs. In the climate of Government cuts to local authorities, it is likely that the proposed 20 per cent fee rise will only be enough to ensure that similar to existing levels of housing delivery take place in London, and therefore it will be difficult for boroughs to access the proposed additional 20 per cent increase.

London's boroughs are receiving approximately 20 per cent of all England's planning applications and the Government can best assist the planning departments of London boroughs by enabling them to charge fees at a level which recovers the full costs of processing planning applications. However, allowing London's boroughs to take up the additional 20 per cent increase without the conditions would be of some assistance. We ask the Mayor to work with the boroughs to lobby government to increase funding for borough planning departments.

69. London Councils supports the increase in production of renewable (including non-combustion based) energy within the GLA boundary to heat, cool and power buildings across the capital. This will have widespread benefits, from reducing carbon emissions and making London more energy self-sufficient, to reducing the impact on air quality. We want the Mayor to provide further information on the 'Air Quality Positive' concept, and how it would apply in practice to the design of new developments and the related impact on borough work streams. We question whether it would be more resource efficient for the Mayor to enforce the Air Quality Neutral standard first before introducing a new standard. One option could be utilising the existing Air Quality Neutral Assessment but reducing the emissions benchmarks rather than devising a new methodology and imposing a new assessment for consultants to carry out and boroughs to review. The aim should be for more combustion free developments.
70. London needs to improve its provision of low carbon/renewable heat and power, therefore the Mayor's commitment to investigate new policies to be included in the London Plan to encourage this are welcomed. However we feel the proposal to consider preventing emissions from energy production plant, including from CHPs, that would exceed those of an ultralow NOx gas boiler, does not go far enough. If the Mayor is going to improve London's air quality whilst also decarbonising, then other options such as Fuel Cells and gas grid decarbonisation should be investigated and supported. We support the proposal for a London CHP register to improve coordination of the installations given the potential air quality issues that can arise from too much gas and biomass being installed.
71. Emissions from wood and other solid fuel burning in London is a growing problem. We support efforts to tackle this, although we are wary of the increased burden on boroughs that comes with more stringent enforcement measures. We highlight the challenges of funding and enforcement here.
72. If London is to create more of its own energy, Anaerobic Digestion (AD) plants could be a potential option. The air quality impacts of new AD plants will need to be considered given that most plants require on site back-up generators.
- Q17. Please provide any further comments on the policies and programmes mentioned in this chapter.**
73. Our overriding view is that the Mayor's actions to tackle air quality are positive, although we need to stress that much of the action, will likely be led by the London boroughs. We call on the Mayor to ensure the appropriate engagement mechanisms are established which enables upcoming policies to be designed inclusively.
74. We suggest that to monitor the progress of the strategy, the Mayor should provide regular (every 1-2 years) updates to London Councils' Transport and Environment Committee (TEC).



## Chapter 5 – Green Infrastructure

**Q18. 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?**

75. We support efforts to make London a greener city and welcome the Mayor's ambitious focus in this area. The practical implications of achieving National Park City status remain unclear. The draft LES does not provide any further detail on the form that designation would take its role in influencing development, and any implications for the management of London's diverse network of parks, green spaces and other green infrastructure. With this in mind we want to work with the Mayor to define the form and function of the National Park City ambition. 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.
76. The concept of a National Park City needs to be set out at a strategic and local level. To assist the Mayor in its development, we suggest the following:
  - i. Communications, led by the Mayor and supported by bespoke borough communications, about how people can help London become greener. For example, planting trees in their gardens or having window boxes outside their flats; not paving or decking over gardens or driveways; using permeable surfaces for driveways etc.
  - ii. Grants and support in-kind from the Mayor's office, along the lines of the Greener Spaces Fund the Mayor recently launched. Community groups, schools, businesses and resident groups should continue to be encouraged to green 'grey' spaces near them.
  - iii. Role for business and business improvement districts – existing and new developments can contribute to on-street and in-building greening efforts.
  - iv. Focus on water– blue infrastructure is also important. This might mean maximising opportunities for funding for flood risk projects through the Thames Regional Flood and Coastal Committee, and a focus on water quality, to improve London's waterways and make them pleasant neighbourhoods.
  - v. Strong London Plan policies that achieve green infrastructure on new developments and use Community Infrastructure Levy and Section 106 agreements to secure greening for existing land as well.
  - vi. Lobbying for better-resourced planning departments – the Mayor could join with boroughs in supporting efforts to better resourced planning departments, through locally-determined planning fees. This would help ensure that developers do meet the conditions of their development.
  - vii. Working with boroughs to identify spaces of community or biodiversity value that fall outside existing formal designations (such as Metropolitan Open Land or Green Belt) and consideration for how these spaces could be protected.
  - viii. While it should not prevent development, National park City status should affect the 'form' of development for instance in achieving exemplar standards for green/blue infrastructure.

**Q19. 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?**

77. 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. If the Mayor wants over half of London to be green by 2050, this will need to be coordinated properly.

78. A key challenge to the successful delivery of new green infrastructure (or indeed the realisation of the potential benefits of existing green infrastructure) is management and maintenance costs. We welcome the Mayors commitment to exploring ways of funding green infrastructure provision, and hope that this research will build on existing lessons learned from recent initiatives such as Rethinking Parks, which tested a number of different models and approaches. It is crucial that quantitative targets for the increase in green infrastructure do not do so at the expense of the effective management of existing green spaces. London Councils calls on the Mayor to set out more clearly the proposal to establish a London Green Spaces Commission including information around its powers and members. We see one of its role to promote the natural capital value of Green Infrastructure in London.
79. An important aspect of green infrastructure in a dense urban area such as London is the overall connectivity of green spaces. The creation of 'green corridors' can help unlock opportunities from existing green spaces by allowing plants and animals to move between them as well as providing enjoyable places for the public to walk and possibly cycle. Enhancing already existing corridors can create habitat areas in their own right, whilst also enhancing people's experience of a place, and improving London's resilience to climate change and potentially contributing to the improvement in air quality.
80. Almost all parks and green spaces are unique in some way. However some overriding principles and policies apply to all. The existence of several forums or partnerships, (The Local Nature Partnership for London, Parks for London, The London Tree Officers Association and The London Borough Biodiversity Forum to name a few), in London contribute to strategic management but what is required from the GLA is guidance and direction to provide the overarching policies and strategy and to co-ordinate positive actions.
81. The London Records Centre holds multiple layers of information on green space, habitats and species. Greenspace Information for Greater London (GIGL) can inform planners and managers on relevant data pertaining to their sites and provide an overview of London's habitats at a landscape scale. Some boroughs do not have a Service Level Agreement (SLA) with GIGL so do not have access to this information. The Mayor could support a strategic approach by funding an SLA for all London boroughs.
82. Monitoring of greenspaces either for condition, change or biological records is an issue as Boroughs have reduced capacity and funding to undertake this work. If London is to co-ordinate management then it is vital to understand changes and what is or is not there.
- Q20. Do you think the proposed policies and programmes will ensure London's important wildlife is protected and enhanced?**
83. The distinction between 'green spaces' and 'good quality green spaces' (for example spaces high in biodiversity, habitat opportunities and providing resilience to flooding that are also accessible by the public) needs to be central to London's green infrastructure plans. Focusing only on the total area of green space is insufficient as this ignores whether the specific green space is delivering all the benefits to London it has potential to offer. As local authorities continue to face difficult financial conditions, the fact that parks are a non-statutory provision for boroughs means that there is the potential for the quality and maintenance of parks to decrease over time as revenue resources are reduced. Some form of 'quality scores' should be developed that provide robust baselines for boroughs across London. This could take a similar form as the Healthy Streets Approach that provides a number of measures that could be taken to provide a number of benefits to different green spaces. These could include features such as: the use

SuDS; air quality levels; high levels of biodiversity; SINCS; the accessibility of the space; the services on offer (playgrounds, places to sit etc.). We would be happy to collectively produce such quality scores.

84. We support the Mayor's commitment to consider increasing the greening of buildings through the new London Plan, although we suggest it needs to be stronger than 'consider' if the Mayor wants London to become a National Park City. An approach to green infrastructure within the planning framework is required that reflects the importance of a broad range of green and blue infrastructure, which could include street trees, green walls, green roofs, brown roofs and small areas of green space. They provide a number of benefits including reducing surface flooding and the urban heat island effect.
85. We welcome the recognition of the importance of smaller green spaces within the draft LES (p157) but would encourage the Mayor to consider how this value and importance can best be secured beyond the confines of encouraging community involvement. While community management can provide significant benefits where there is the motivation and capacity to achieve it, it cannot be relied on as a strategy to secure the management of local green space and risks disadvantaging those communities without the necessary 'ingredients' for a successful community project to enhance and manage green spaces.
86. The advantages of planting the right kind of trees in different urban areas are clear. They can provide shade, reduce flooding (for example through the use of SuDS tree pits), improve air quality, increase biodiversity and offer places to rest and spend time. We support the Mayor's commitment for a tree planting programme, but we feel that the draft LES could include more of a focus on other forms of green infrastructure as trees get a disproportionate amount of focus. Other forms to consider are flowers, ferns, grasses and shrubbery. It is important to ensure that the installation of green infrastructure is designed well to avoid unwanted consequences; such as creating 'street canyons' which can act as air pollution traps, damage from tree roots to highway assets, such as pavements, roads and drainage infrastructure, and a reduction in pavement space.
87. London Councils 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.
88. The inclusion of Sites of Proposals of Importance for Nature Conservation (SINCS), the promotion of wildlife friendly landscaping in the new London Plan and the proposal to implement a biodiversity offsetting approach in London are both welcomed in principle. The boroughs would welcome more information on how this will be implemented when plans are developed. An idea is to develop an 'offsetting hierarchy'.
89. London Councils supports proposals from the Mayor to provide guidance and support on managing habitats and creating new ones. We too recognise that the amount of in-house borough expertise has fallen. We encourage the Mayor to draw upon existing established sources of expertise, and look at the models of delivery that have been considered first by the Green Infrastructure Taskforce and the London Assembly Environment Committee before developing new ones. We would also like to see more ambitious targets in Table 1 (habitat creation and restoration per hectare by 2050) for rivers and streams as the target is for only a 400 per cent increase, when the other targets are between 500 per cent and 1000 per cent increases. This is particularly the case given London's challenges with water quality.



90. We understand the need to collect the data in a consistent format and would welcome discussions about how this could be done in a financially sustainable way. We also seek clarification on whether this is monitoring of species or performance by landowners. We seek to understand whether this proposal involves using the Greenspace Information for Greater London (GIGL) database or developing something new. The Mayor should add to the GIGL database by investing in more research on the most effective species of plant or tree for the reduction of different pollutants in various planting locations – to advise and inform boroughs, businesses and residents on the best ways to improve air quality through installing greenery.
91. Educating others about the many benefits of installing green infrastructure will be crucial to increasing the provision in London. Providing a strong evidence base for green infrastructure as long as it is relatable to conventional economics and therefore usable by local authorities in their investment decisions is crucial. The SUDS Opportunity Modelling is much-delayed but potentially a very welcome piece of work that could help identify priority areas for green infrastructure. Any research or tools developed need to be publically accessible to boroughs and other users, such as developers and other landowners.
92. The commitment to finding new approaches to investment in green and blue infrastructure projects is welcomed, and the funding of projects across sub-regional partnerships should be encouraged, long as the 'pooling of funding at sub-regional level' does not remove funding from boroughs. The lack of references to the Thames Regional Flood and Coastal Committee is surprising in this context given that it has funding from Defra for flood risk management and sustainable drainage.
- Q21. Do you think the proposed policies and programmes will be effective in increasing London's tree canopy cover?**
93. The policies and programmes proposed to increase London's tree canopy cover are a positive addition to the draft LES. The role of the boroughs in increasing London's tree canopy cover is currently unclear within the draft LES and could require increased resources in relation to ongoing maintenance costs. Boroughs are also concerned that where an old tree needs to be removed because it is dying or dead, the new tree planted leads to a reduction in tree canopy cover, even if the new tree is a more suitable tree for the location, for example a pavement. Boroughs should not be criticised for replacing trees as necessary, and keeping the existing level of canopy cover is already a challenge. We therefore think a 10 per cent increase is highly ambitious.
- Q22. How best can natural capital thinking be used to secure greater investment in the capital's green infrastructure?**
94. The Greenspace Information for Greater London (GIGL) collates and manages datasets on the type and composition of London's green infrastructure alongside data on habitats and species. But the availability of data on the quality, functions and uses of London's green infrastructure is much more limited. Trialling new ways of measuring this could help build up the financial case to invest in green infrastructure in London. The 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.
95. It is important to recognise the latent potential in much of London's existing green infrastructure that could be realised through changes in form or management. In a context of declining

revenue budgets it is important that quantitative ambitions for green space do not spread reducing resources more thinly and undermine the ability of land managers to realise the benefits of existing green space. We would welcome a stronger emphasis on the identification of 'underperforming' green space and practical advice on modifications that can achieve the range of benefits that high quality green infrastructure should deliver.

**Q23. Please provide any further comments on the policies and programmes mentioned in this chapter.**

96. Although the air quality chapter in the draft LES is fairly comprehensive there could be a slightly stronger link between air quality and green infrastructure and energy sections (non-combustion sources of power). There is also a lack of comment on the links between green infrastructure and energy efficiency and energy generation - for instance when discussing green roofs the draft LES does not make it clear that they can be installed alongside solar panels, rather than instead of.
97. Reduced staff resource will also impact on the ability of boroughs to deal with the increased workload and ongoing costs associated with some of the Mayor's proposals. For instance, while we support 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.
98. Many boroughs have lost staff and teams working on various environmental areas, including energy and fuel poverty and green infrastructure. This then impacts on the boroughs ability to provide effective enforcement on a number of key areas, with planning being a key one, which will be crucial for many of the targets to be achieved. Boroughs struggle to enforce many of the planning measures that currently exist, due to lack of staff resource. This has created different approaches across London. Any changes to the London Plan need to recognise the limited resources of boroughs, and not just place burdens on the boroughs and expect the policies to be effective.

## Chapter 6 – Climate Change Mitigation and Energy

### **Q24. Do you agree that the policies and proposals outlined will meet the Mayor's ambition to make London a zero carbon city by 2050?**

99. London Councils support the Mayor's aim to make London a zero carbon city by 2050. We question whether the proposed approach and pace is realistic and achievable within the current national context, with a lack of funding programmes and policy frameworks in place.
100. As has been mentioned in our response to Chapter 5 (Green Infrastructure) achieving necessary performance (of green infrastructure or CO<sub>2</sub> reduction) on site should be priority for all development proposals. Any offsetting should represent a last resort – except in case of zero carbon (below). It is essential that the energy and carbon performance of new developments minimise the need for offsetting. Relying too heavily on offsetting could encourage developers to continue to use polluting practices, and delay the introduction of vital changes to legislation. The current London Plan's energy hierarchy for zero carbon development should be more detailed to provide more guidance to developers, placing offsetting as a last option and also reduce the amount of carbon that can be offset in relation to developments.
101. Monitoring and reporting on London's emissions regularly is important, as is the sharing of this data. We support the Mayor's commitment to publishing the London Energy and Greenhouse Gas Inventory on an annual basis.
102. Decentralised energy can be a useful tool at the Mayor's disposal to reduce CO<sub>2</sub> in London, although it is also important to highlight that decentralised does not necessarily mean low carbon or renewable, so this must always be a priority in any development programmes, and should be reflected in the final London Plan. We welcome the proposal for a District Heating Delivery Body for London – and want to highlight that boroughs should have a key role in coordinating this work. Given that London's population is due to increase, energy demand will only increase in the future, therefore it is crucial that the opportunities for this work are exploited with future demand in mind. The work needs to be linked to air quality and the energy hierarchy in order to prioritise non-combustion sources of energy rather than combustion. The use of fuel cells should be investigated and supported across the capital.
103. It is important that new decentralised energy projects are linked to the development of low energy design buildings to minimise demand and improve efficiency. A 'whole systems' approach should be adopted where possible to ensure that each stage of development and energy provision is contributing as effectively as it can to carbon and air pollution reduction. The London Heat Map is seen as a useful tool and hopefully the Decentralised Energy Enabling Project (DEEP) will maintain and update this regularly as part of its remit.
104. We support the pledge to increase solar energy generation capacity in London. Community energy projects can be an important vehicle for deployment of solar energy and the Mayor should aim to support projects where possible. Community energy projects can help to deliver other forms of renewable energy as well. Some boroughs are already doing this, so the Mayor should link with these and compliment this work where appropriate rather than work in conflict to these projects.
105. Better planning of energy systems is another important component of a move to a zero carbon city. Smart systems and increased use of demand side response mechanisms need to be

exploited. We support the Mayor's plans to undertake demonstration projects and trials in this area and call on the Mayor to work in collaboration with the boroughs on this.

106. It is important that the Mayor continues dialogue with central Government to increase ambition and provide clarity on sustainable design and construction approach. Boroughs are still impacted by policy uncertainty following removal of the Code for Sustainable Homes. London Plan ambitions are welcome and London should continue to lead the way in this policy area.

**Q25. 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?**

107. Improving the energy efficiency of London's homes is central to reducing demand and achieving zero carbon city status by 2050. We support the Mayor's aims in this area. We agree with assertions made by the boroughs that the 100,000 of retrofitted homes per annum target is unrealistic given current funding, national policy, previous performance (130,000 properties only lightly retrofitted since 2009 under RE:NEW) and the technical challenge of retrofitting pre-1919 homes. Considering the many challenges with retrofitting certain house types we consider that there is more scope for domestic solar (PV and thermal) on all house types including on pre-1919 homes as way of triggering a more energy conscious culture in the home. Solar panels can be installed under permitted development rights in most cases, and provides very limited technical risk. Solar thermal can remove all hot water heating demands over summer months while PV with battery storage is a better long term solution to future domestic energy profiles (smart home and Electric Vehicles (EVs)).
108. We welcome the commitment to the provision of technical assistance, support and funding to Londoners to improve energy efficiency. Many of the most effective energy efficiency measures are prohibitively expensive to install (solid wall insulation), making it difficult for many Londoners to afford. Unfortunately the market for many energy efficiency measures has stalled; therefore financial support is still needed. It might be more effective for London to focus mainly on fuel poor households and the private rented sector through a refreshed partnership with local authorities, whilst continuing to make the case for a shift in national policy on an overall national energy efficiency strategy. Councils are best placed to identify fuel poor households and are more likely to have funding available to support them as opposed to 'able to pay households'; there are also clear opportunities in relation to Minimum Energy Efficiency Standards (MEES) for the private rented sector. This approach would align with evidence from the Policy Exchange and Cambridge Econometrics<sup>2</sup> demonstrating that energy efficiency programmes targeted solely at the fuel poor secure higher carbon savings than those offered randomly to both able to pay and fuel poor (which can increase emissions). As well as tackling domestic carbon and fuel poverty simultaneously the approach would also protect fuel poor homes from being disproportionately affected by future national policies supporting decarbonisation – because financing such initiatives is typically recovered through household energy bills. Protecting poor households from the policy costs of decarbonisation therefore becomes a precondition for a socially just decarbonisation strategy. Alongside this the Mayor should campaign for a national Government energy efficiency strategy which should deal with all sectors, including the able to pay households.

<sup>2</sup> <https://policyexchange.org.uk/wp-content/uploads/2016/09/warmer-homes.pdf>

109. The Government has to do more on energy efficiency. The Green Deal, the last flagship policy focused on retrofitting buildings, ended in 2015 and no alternative has been forthcoming. The Committee on Climate Change believes the Government should set out an annual retrofit rate for renewable-compatible building stock, although this would also require funding from central government. Engaging the 'able to pay' sector will be crucial in the long term to helping reduce costs in energy efficiency measures, but targeting fuel poor households now will address multiple challenges. We also feel that the greater role for local authorities in ECO should be formalised when ECO3 arrives, and the Mayor should campaign to support this with the boroughs.

110. We support the Mayor piloting state of the art methods of implementation for energy efficiency retrofitting. The Mayor needs to explain how the learning from these trials will be shared with boroughs and Londoners. We would like to see that this is contributing to the market and not replicating work being done by others.

**Q26. Which policies or programmes would most motivate businesses to reduce energy use and carbon emissions?**

111. Non-domestic and commercial buildings will play a big part in reducing CO<sub>2</sub> emissions and improving air quality, given their energy use, which is often powered and heated by combustible sources. We welcome the Mayor's proposal to provide direct technical support to the public sector to reduce CO<sub>2</sub> emissions and believe that the expanded focus of RE:FIT is a good thing, as is the Mayor's focus on commercial buildings.

112. The financial savings that energy efficiency measures can bring need to be promoted in order for businesses to recognise the benefits, and link them to opportunities for funding and support. For example, the Mayor could offer 'carbon-saving' investment loans to businesses.

**Q27. 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.**

113. We support the aims of the Fuel Poverty Action Plan and welcome the Mayor's acknowledgement of borough capacity issues in this document, and his commitment to support boroughs to target fuel poverty in London. There may be a need for the Mayor to say more about the financial incentives that the Mayor can offer directly (for example in terms of supporting applications for grant funding) because, as has been mentioned above, the significant bulk of carbon reductions from domestic properties are from 'able to pay' households.

114. In relation to the Mayor tendering for an energy supply company, we agree that Londoners need a better deal when it comes to their energy bills. We question whether the stated approach (using a white-label company) is the best option. Some of the boroughs are already ahead of the Mayor in this area, and we feel that it is essential for the Mayor to positively work with the boroughs to avoid competition for the same customers or duplication of effort. It may be better for the Mayor to support the existing programmes, and perhaps set up a fully-fledged energy supply company instead which would have a more transformative impact on the market, for example by procuring only renewable energy, and prioritising non-combustion sources of power where appropriate.

115. We support the Mayor's opposition to fracking.

116. The introduction of five year carbon budgets for London to manage the pathway to a zero carbon city is welcomed if the Mayor's carbon budgets are for reference to help drive action rather than enforce any additional responsibility on local authorities. We strongly support the carbon budget proposal but consider that defining the scope of policies and programmes before concluding this would have provided a better evidence base for their scope over this Mayoral term (which broadly aligns with the proposed first budget period of 2018-2022). In its absence, Figure 33 actually shows very limited Mayoral led carbon reduction action to 2022 (only the zero carbon buildings standard) and only a 40 per cent reduction ambition, which is likely to be met by grid decarbonisation alone (London emission are already 30% below 2005 levels). We therefore consider that a more ambitious target to 2020 should be proposed and clearer definition should be provided about the progress required over the Mayoral term/first budget period. This could include, for example, how many homes require retrofitting between now and 2022; how much renewable energy needs to be deployed; and the extent to which decentralised energy (for example heat networks) infrastructure should be in place.
117. We welcome the acknowledgement that there is often a performance gap between the design of buildings and their actual performance. This comes back to the changes needed in clear, strong planning requirements and the better design of buildings.



## Chapter 7 - Waste

### **Q28. Do you agree that the Mayor's policies and proposals will effectively help Londoners and businesses to recycle more?**

118. The zero waste aim is laudable and we welcome the ambitious nature of the Mayor's aims but there is a lack of clarity around what the term 'zero waste' actually means. This potentially devalues the term, and we would seek further clarification on what the term means in real terms, whether it is zero waste to landfill or zero waste arising for example.
119. London Councils supports the Mayor's ambitions for London to be recycling more of its waste. However, this must be viewed within the overall waste hierarchy which means London needs to reduce the overall amount of waste it produces. This is particularly the case when the government is concerned about the quality of the recyclate (as are boroughs, since higher quality materials fetch higher prices than poor quality materials) yet the Mayor continues to focus on a tonnage target.
120. London Councils welcomes the recognition 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. Nevertheless without additional funding the 42 per cent target will be challenging to achieve. The boroughs alone cannot expect to shoulder this burden, and central Government will need to do more to help push a transition to a low carbon circular economy by engaging with producers of consumer goods, and setting national requirements for their performance.
121. We are deeply concerned at the passing reference to the significant costs of "implementing the best set of household interventions" which is estimated to be £107m-£319m<sup>3</sup>. The draft LES suggests these costs can be offset by income from offering business waste services, reducing disposal costs, and developing more shared contracts. We welcome the stated £200m savings achieved by the South London Waste Partnership's joint procurement, but the Mayor needs to provide more evidence that it is possible to realise savings and qualify that these savings are usually over long return periods. The length of contracts is ignored by the draft LES. We also assume the GLA has evidence that local authorities are successful at winning Business Improvement District contracts and we would welcome these examples in the final LES.
122. We seek more information on the other non-household waste collection services (page 281) that will enable boroughs to be able to fund the needed seven percentage points boost in recycling rates. Appendix 2 does not appear to reference this. As we understand it, this could include collecting offensive waste (such as hygiene and sanitary products like nappies) and collecting hazardous waste (which the City of London undertakes on behalf of all the boroughs). The challenge for boroughs is that as producer responsibility rightly accelerates over the lifetime of the LES, this will leave local authorities responsible for collecting materials of lower quality and that are least recyclable or reusable. This means that the challenge to recycle more will become harder. A useful reference could be the Scottish Government's duty to separate which is designed to match reliable feedstocks to investment in new infrastructure. The Mayor should campaign for central government to develop a similar policy.

<sup>3</sup> Draft London Environment Strategy, page 279

123. Whilst it is usually cheaper to recycle than send waste to landfill, this relies on there being a strong market for recyclate. The risk of countries such as China significantly changing their import controls on recyclate cannot be ignored. WRAP have recently appealed to Defra to maximise the opportunity associated by these import control changes to “*encourage the use of secondary materials in UK manufactured products and open up new market opportunities*”<sup>4</sup> and link this to the developing Industrial Strategy. The recent fall in oil prices has caused virgin plastic to become more economically attractive, damaging the prices local authorities receive for their recyclate. Business waste services are also yet to be fully developed. If the Mayor is committed to helping boroughs address the costs of changing their waste arrangements, he should forward fund the costs, to be repaid from the savings he is confident will materialise.
124. We are also concerned that the focus on waste collection systems obscures the more fundamental challenge that regardless of the collection service boroughs provide, convincing the public to use the service correctly is challenging. People are busy; speak multiple languages; and are disinterested in environmental matters. Borough communications departments are diminished and therefore even if every borough did offer the same service, there would still be the challenge of getting everyone to recycle correctly.
125. Boroughs lack effective enforcement powers to require residents to recycle, following the Deregulation Act 2015. It is possible to enforce, but in a much more lengthy and challenging process. Regardless, the powers are unusable for communal collections where it is impossible to know who is not recycling correctly.
126. London Councils advocates converting the Mayor’s published household waste recycling targets into residual waste per household targets. Improved household waste services should be measured via a kilogram per household indicator that is pegged against the Mayor’s recycling target. The following interventions become complementary to such a target: waste prevention campaigns; producer take-back schemes; producer light-weighting; private sector recycling; and ‘de-materialisation’. Without this boroughs seeking to reduce waste arising are potentially working in opposition to a tonnage-based household waste recycling target. For commercial waste we continue to view a percentage based target as the most effective as it would avoid prejudicing boroughs that did not actively pursue commercial waste contracts with local businesses, particularly if their area is already well served.
127. We support the Mayor’s proposal to support efforts to consolidate commercially collected waste services, and preferably this would put local authorities in a strong position to bid for consolidated contracts. Whilst the draft LES acknowledges the Mayor has no powers over the private waste sector, and discusses the role of Business Improvement Districts in consolidating waste locally, we also want to see the Mayor using his ability to convene directly the private waste sector. The Mayor should commit to encouraging these contractors to do more to increase business recycling and consolidate their operations, to support the Mayor’s other objectives regarding reduced journeys, improved air quality, and improved road safety. The same is true for construction, demolition and excavation waste.
- Q29. 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?**

<sup>4</sup> Letter to Defra Minister the Confederation of Paper Industries, Resource Association, the Recycling Association and Environmental Services Association - [<https://www.letsrecycle.com/news/latest-news/trade-bodies-call-for-urgent-action-on-china/>]



128. We support the Mayor's ambitions to collect food waste and the six main recyclable items but note that Proposal 7.2.1a only concerns kerbside properties. We know that there is more to be done on introducing food waste and we welcome continued support from LWARB and Resource London for boroughs looking to introduce these collections, particularly in flats. Perception data gathered by Resource London indicates young people aged 16-24 are least likely to engage with food waste. This is a concern, especially if these habits stay with them for life.
129. WRAP modelling undertaken for the London Waste and Recycling Board indicates that the costs to offer flats food recycling are significant and doing so can only increase London's recycling rate by one per cent. We therefore agree that Proposal 7.2.1a should not include food waste for flats, although if any borough can achieve a financial business case for doing so we support this. Whilst Proposal 7.2.1a concerns only kerbside properties, we acknowledge that flats recycling services are not universal depending on the type of flat (typically flats above shops are the most difficult type of property to offer recycling to). We welcome continued efforts by Resource London to work with boroughs to develop suitable flats recycling services.
130. The overall timescale for boroughs to be collecting food waste by 2020 is an unacceptably close timescale which the Mayor will not achieve. This target demonstrates a lack of understanding of how local authorities contract their waste services.
131. For the other six recyclable materials, the Mayor needs to be careful not to overstate the picture. Existing arrangements and/or market conditions may prohibit the full range of six designated materials being sent for recycling.
132. Behaviour change campaigns will be fundamental to success. Critical to achieving the remaining change is to persuade more people to use the recycling services and to use them properly (i.e. no contamination).
133. We support the mention in the draft LES of small electricals, foil and tetra packs but again think the situation is overplayed. Most boroughs already collect foil and tetra packs as part of their regular recycling service. Small electricals are usually collected at Household Waste and Recycling Sites or via reuse centres. The Mayor should be lobbying industry for greater producer responsibility and 'bring back' schemes here. The Mayor could add batteries to this list as well.

**Q30. Do you think the Mayor should set borough specific household waste recycling targets?**

134. We agree with the Mayor that to achieve 42 per cent, 50 per cent and 65 per cent pan-London recycling targets, at a local level some boroughs will need aim for higher recycling rates (perhaps by as much as 70 to 80 per cent recycling) in recognition that some boroughs will struggle to achieve much lower rates. We do not support individual borough recycling targets as we feel this would be an unhelpful layer of bureaucracy and prescription from the Mayor to the boroughs. However, we suggest that the WRAP modelling undertaken for Resource London gives an indication of the recycling potential in each borough and this could be developed further by Resource London working with the boroughs to help them identify what may be achievable given service constraints, their specific housing stock and the costs involved. We also reiterate our position above about the need to reduce waste overall, not just recycle more of it, and recycling targets risk obscuring this.

**Q31. What needs to happen to tackle poor recycling performance in flats?**

135. We support the overall aim to increase recycling in flats given how many properties in London are flats. Flats should not be considered as one homogenous unit, however. They typically break down to:
- i. Converted houses with multiple flats, where individual property kerbside collections are usually possible;
  - ii. Purpose built low-rise flats where communal collections are more likely but may still be kerbside or near kerbside;
  - iii. Purpose built high-rise flats where communal collections are inevitable and will involve the crew spending considerably longer emptying waste receptacles;
  - iv. Flats above shops, where a lack of frontage means waste is collected from the street or from a nearby communal waste point. Timed collections may be used if waste and recycling is collected from the street.
136. We think the Mayor, via LWARB and Resource London, needs to use this segmentation when addressing flats recycling because we do need to see a rollout of 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, boroughs are unlikely to be able to introduce food waste services into flats where they do not already exist by 2020 unless this contract change is already planned.
137. Planning is an important tool at the Mayor's disposal when it comes to encouraging recycling. We want to see the Mayor include reference to LWARB and LEDNET's flats guidance in the London Plan and Housing Supplementary Planning Guidance which ensures that developers design-in space in kitchens for residents to sort their waste; create enough waste storage for low-frequency collections (whatever the local authority offers); designs-out the risks of residents contaminating collections; and has space for council waste vehicles to safely collect waste without blocking the street.
- Q32. What are the most effective measures to reduce single-use packaging in London such as water bottles and coffee cups?**
138. Reducing the use of single use packaging will be a key psychological factor in the shift to a low carbon circular economy as well as reducing waste in London. London Councils supports the Mayor's proposals to do this in the absence of national action. We feel that in relation to the creation of a deposit return scheme for water bottles, the Mayor should look to lead on this issue, not wait for government action. A lot of environmental organisations are already active on plastic bottle waste and there could be some useful synergies. The Mayor might also consider one or more London pilot 'refill' schemes<sup>5</sup>. These are projects aiming to encourage more people to refill existing bottles with water, rather than purchase new ones. As the paper cup industry is currently actively addressing coffee cups, we suggest the Mayor support these efforts but focus directly on addressing water bottles, especially by using the GLA estate and the convening power he has to encourage other landowners to do the same, including the boroughs. The overall aim, however, should be to encourage government to take national action to address single-use packaging. The recent initial steps by government to start looking at this should be welcomed and supported by the Mayor.
139. We are confused by the references to the Government's Litter Strategy Group given that the Litter Strategy has already been published without the GLA seeking to be involved, and the

<sup>5</sup> <https://www.refill.org.uk/refill-schemes/>

government is now focused on implementation, again without the GLA seeming to sit on any of the working groups.

**Q33. Please provide any further comments on the policies and programmes mentioned in this chapter.**

140. London Councils notes that the 'general conformity' responsibilities of boroughs regarding waste have been expanded, particularly in relation to the inclusion in Box 30 (page 259) of the requirement to *"carry out any other relevant activity supporting the Mayor's policies and targets"*.
141. London Councils supports the aims of the Mayor to reduce emissions from the transport of waste but believes it could take decades to transition to a zero-carbon fleet due to the lack of vehicle options available and the length of contracts. London Councils have previously called for more rail and river transport of waste and freight, which some waste authorities and boroughs are using effectively. As we have set out in our response to the draft MTS, we therefore encourage Transport for London and the Port of London Authority to take the necessary steps to support the decarbonisation of fleets. To increase the usage of the Thames the related river infrastructure needs to be developed – for instance London needs more docks and piers to accommodate the increased use of the river. It should be a key ambition that London's rail and river transport systems are decarbonised at the same rate as road transport.
142. We support the use of local waste facilities by waste authorities (Proposal 7.4.1a) although this may be dependent on private contractor sites if the services are outsourced. Treating London's waste within the capital is a laudable ambition, and one that could provide a number of benefits, such as eliminating all the costs associated with transfer stations and bulk-haulage fleets through direct delivering, potential for reduced congestion and air pollution. However, the pressure on space for development and the lack of space for new waste infrastructure, including re-use, needs to be considered in the forthcoming London Plan.
143. We do not feel that the infographics given on pages 268 and 269 or any of the supporting text explains how the Mayor will achieve zero waste London by 2050. We also want to see garden waste illustrated as a separate waste stream, and not included in the non-recyclable waste stream of film, broken or contaminated waste, and drink cups. Outer London boroughs with large numbers of gardens are already demonstrating that this is an important part of their ability to reach high recycling rates. Page 263 says London has few gardens, yet the green infrastructure section of the draft LES says 24 per cent of London is gardens, with about 60 per cent of this being green. Given how important these boroughs will be to achieving the recycling targets in London, we find it anomalous not to recognise that garden waste is a waste stream, and one that counts as 'recyclable'. We want to see this rectified in the final LES.
144. The proposed draft LES does not assist the development of heat networks powered by energy from waste (EfW) facilities. There is great potential to increase the numbers of homes and businesses connected to EfW powered low carbon heat networks however investment and commitment is required by the Mayor in order to overcome initial hurdles which is holding back development at present. The GLA do not currently provide funding to connect EfW to heat networks. An example is the RRR facility in Bexley which is not connected to any heat network (such as the proposed Thames Gateway Heat Network).
145. No commitment is made by the Mayor towards decarbonising current EfW facilities, something which is already happening at EfW facilities elsewhere in Europe (for example in Oslo, Amsterdam, Rotterdam and Hengelo). The GLA should take a leading role in partnership with

the waste authorities to ensure that London's EfW facilities remain up to date and contribute towards energy provision and waste recovery objectives.

146. The Mayor should further develop the Transport for London Greenwich power station to South East London Combined Heat Power (SELCHP) electricity cable link proposal which will enable powering the Underground with low carbon electricity generated from waste.

## Chapter 8 – Adapting to Climate Change

### **Q34. Do you think the Mayor's policies and proposals are sufficient to increase London's resilience to climate change?**

147. London Councils supports the Mayor's plans in relation to developing monitoring indicators for London's resilience. It is important that this information is promoted and shared widely.
148. The approach to reducing the various types of flooding is welcomed and the policies to achieve this are strongly supported. There are clear links between resilience to flooding and green infrastructure, which are recognised in the draft LES.
149. While welcomed, the management of fluvial flood risk seems to be mostly focused on the Environment Agency, despite the reference to all flood risk authorities. It would be more accurate if it were to include a slightly better reflection of the borough role in terms of ordinary watercourses.
150. London Councils supports the Mayor's proposals to maintain London's standard of protection from increasing risk of tidal flooding as well as plans to support measures to build the city's protection from the Thames and Thames Estuary, including safeguarding of sites for a new Thames Tidal Barrier in the east.
151. The Mayor needs to consider Sustainable Drainage Systems (SuDS) on the Transport for London Road Network (TLRN) as well as in new developments across the capital in the London Plan. We are also surprised that proposal 42 in the draft MTS (to install SuDS to enable the removal of 50,000m<sup>2</sup> of impermeable highway surface per year in London) is not mentioned in the draft LES.
152. The need for green infrastructure to be included in new developments or areas of redevelopment is important to reduce the risk of surface water flooding across London. As such we welcome the Mayor's proposal to consider more ambitious requirements for SuDS at new developments, and continue to encourage the Mayor to strengthen SuDS requirements in the forthcoming London Plan. There is a role for taking a catchment based approach to surface water flooding, as with other types of flooding. Many of these opportunities are outside of London's boundaries, however we would support the Mayor continuing to work with the Thames Regional Flood and Coastal Committee to maximise opportunities to manage risk upstream.
153. We support the proposal to implement the actions in the London Sustainable Drainage Action Plan to retrofit more sustainable drainage for London. Private property owners, among others, are important stakeholders here.
154. The Mayor should ensure that any communications protocol identifies the correct partners to spread the information quickly, accurately and to the right people. The boroughs will be a key player here, and will need to be part of the development of the protocol.
155. We support the Mayor's proposals to work with infrastructure providers to improve their understanding of the effect of increased temperatures and the Urban Heat Island effect in London. We are supportive of the Mayor's proposals to minimise the risk of new developments overheating, although note that planning departments are under-resourced and rarely able to check that developers deliver on the conditions they are required to meet. Ensuring synergy with green infrastructure and sustainable water policies is necessary to minimise impact on

borough workloads. However we also acknowledge that there is often an inconsistent approach to enforcement across London, and this must be addressed.

- 156. The provision of shaded public areas is something that we support, and we support the Healthy Streets concept developed by the Mayor. Providing green infrastructure to meet this objective will also contribute towards reducing the urban heat island effect and make places more pleasant to spend time.
- 157. The impact of heat on public transport is important to tackle and we welcome the innovative and comprehensive proposals set out in this area without focusing heavily on using air conditioning, which would increase energy demand overall.

**Q35. 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?**

- 158. We welcome the focus on educating and informing Londoners on the risks of climate change. Behaviour change of individuals and organisations will be crucial to mitigation and adaptation to climate change, and will help improve London's resilience, giving people an understanding of how to limit and eliminate certain risks, but also on how to recover from incidents quickly.
- 159. In our response to the draft MTS we propose that any new transport infrastructure be future-proofed to ensure resilience is built into the system. This should be the same for energy, water and critical infrastructure. Regular flood risk assessments of existing critical transport infrastructure should also be undertaken.
- 160. We believe that the Mayor has a strong role to play in promoting resilience measures in London, and that London can have a strong leadership role on this issue in the UK and internationally.
- 161. It is also important to highlight that climate change also means we are going to suffer from more erratic weather. This means that extreme cold should also be included in resilience planning, which can have devastating impacts on vulnerable groups if not protected properly. In the period 2008 - 2011 an estimated 19 per cent of deaths were considered Excess Winter Deaths in London<sup>6</sup>. People become accustomed to mild winters, meaning they are not prepared when a very cold period arrives and this heightens the impact.

**Q36. Do you agree with the Mayor's policies and proposals to reduce water demand and leakages in London?**

- 162. London Councils in principle supports the planning and development of a new water resource for London, although we would need to see more detail on any proposals before making further comment.
- 163. We agree that the Mayor should hold London's water companies to account on the need to further reduce leakage rates and reduce the likelihood of major water mains bursts, but would welcome more information on how he proposes to do this.

<sup>6</sup> <https://data.london.gov.uk/dataset/excess-winter-deaths-borough>



164. Water meters could be a driver for behaviour change when it comes to reducing water demand, which is especially important as London is one of the most water-stressed cities in the world. The public need to be engaged on this issue and the benefits.
165. The Mayor's proposal to support delivery of water saving measures through the Energy for Londoners programme is welcomed, but we feel that water poverty should be more explicitly mentioned in the Fuel Poverty Action Plan, given it is an essential utility and its price has increased by 41 per cent over the last decade, much higher than inflation<sup>7</sup>.
166. While we support the ambition of the Mayor to consider the policies that require new housing developments to be more water efficient, we would question the level of ambition in the draft LES. The stated target of 105 litres per person per home was the original target before the Code for Sustainable Homes was scrapped in 2014. We question whether the Mayor's ambition could go further on this. Again, borough planning departments would be responsible for ensuring developers deliver, which is challenging.
- Q37. What do you see as the biggest opportunities to tackle climate change risks in London and how can the Mayor support this?**
167. The challenges of climate change adaptation and mitigation are massive; it is already destabilising systems and industries that have existed for decades. This can bring opportunities, for example in the growth of new industries and sectors that look to tackle the climate change challenge. This has already begun to be seen with the electric vehicle market, and the green tech sector. Given the slow rate of renewable energy installations seen in London compared to other areas over the last few years, there are still opportunities for more renewable heat and power capacity right across the capital. The same is true for energy efficiency retrofit installations.
- Q38. Please provide any further comments on the policies and programmes mentioned in this chapter.**
168. Every borough and sector will have its own particular climate impact risks and opportunities. We support the proposal to establish a baseline with partners because it will enable the GLA to identify the biggest risks and opportunities at a London scale and then work with those sector partners to address them. Boroughs are concerned about surface flooding, the loss of green space through development pressure and the impact of heat waves and cold spells on vulnerable groups. There are potentially significant opportunities to address all four of these issues through improved adaptive capacity in highways/public realm improvement projects. Ensuring the incorporation of SuDS into all new developments, rain gardens to increase green space provision and shading and water fountains to provide respite for the elderly is necessary.

<sup>7</sup> <http://www.independent.co.uk/news/business/news/household-bills-rose-twice-as-fast-as-salaries-over-last-decade-a7810971.html>

## Chapter 9 – Ambient Noise

**Q39. Are there any other actions you think the Mayor should be taking to work with the boroughs and other key stakeholders to reduce noise?**

169. We support the Mayor's Policy and associated proposals to minimise the adverse impacts of noise from London's road transport network, including working with TfL to encourage mode shift, the transition to a zero emissions traffic network, and work to reduce noise from freight activity. If the uptake of electric vehicles increases in line with industry expectations this will bring expected reductions in traffic noise.
170. With the introduction of night-time tube services and potential expansion of the number of lines and introduction of Overground services, we would welcome specific mention of public transport regarding actions to mitigate noise impacts from the night-time economy.
171. The Mayor's proposals to encourage quieter driving styles and provide low noise road surfaces are welcomed but we feel that boroughs should be able to implement the measures appropriate to their areas that help achieve the goal of reducing noise from traffic. The issue of traffic speed enforcement needs to be co-ordinated more effectively with police.
172. We are similarly supportive of the Mayor's policies and associated proposals to minimise the adverse impacts of noise from non-road transport and non-transport sources. We would again highlight the need for ongoing engagement with the boroughs as they will have an important role in much of these actions. The issue of noise from helicopters and other light aircraft is something that impacts on residents. The control for managing this lies with the Civil Aviation Authority, and the Mayor should look to engage with them to minimise unnecessary flights over residential areas
173. London Councils does not have a formal position on Heathrow Airport expansion and will leave affected boroughs to comment on this.
174. London Councils supports in principle the promotion of use of good acoustic design through the London Plan.
175. One area of potential conflict is the increasing take-up of 'time of use tariffs' which could result in the greater use of more appliances at later times, such as at night, which can result in night noise for neighbouring properties.

**Q40. 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?**

176. Improving compliance will be crucial to the success of lower speed limits. We want to see the Mayor addressing this in the final MTS and LES with a commitment by the Metropolitan Police Service to enforce all speed limits. If the Mayor opts not to direct his police force in this way, then London Councils wants to work with the Mayor and TfL to explore how powers to ensure compliance with road speeds could be devolved to boroughs in London. The Mayor could also work with car insurance companies on incentives for using 'black box' devices that monitor speed and road compliance.



**Q41. Do you agree with the Mayor's policies and proposals to improve Londoners' awareness of the health risks of noise?**

177. London Councils agrees with the promotion of more quiet and tranquil spaces across London. As funding will be challenging, we want the Mayor to explore through the Green Spaces Commission the opportunities for innovative funding models. We think the draft LES could do more to articulate and emphasise the actions that are proposed to improve awareness of health risks associated with noise.

**Q42. Please provide any further comments on the policies and programmes mentioned in this chapter.**

178. London Councils' supports efforts to ensure London has a vibrant night-time economy, but there is a balance between promoting this and dealing with the noise/complaints that may arise from residents.

## Chapter 10 – Transition to a Low Carbon Circular Economy

179. We agree that London can build on work to grow the low carbon and environmental goods and services sector. London can be a leader in the Cleantech sector, and we welcome the Mayor's previous commitment to this industry. The Cleantech industry can be a huge boost in moving towards a low carbon circular economy, and can harness the excellent resources at its disposal in the form of the academic institutions across London.
180. We see sustainable procurement practices as a very powerful tool, and there needs to be a joined up approach to encouraging demand for low carbon goods and services. Many boroughs have been operating sustainable procurement policies for years. The development of financing mechanisms in the green economy continues to be an important issue, and would certainly be welcomed considering the difficult financial situation faced by the public sector.
181. We support the principle behind the Mayor's policy to build on London's strengths and enable London's businesses, academia and citizens to actively compete in and contribute to the low carbon circular economy. We would welcome more detail about the programmes of work the Mayor plans to implement in this endeavour, and the role the boroughs might play in this.
182. One issue that needs more attention in this section of the draft LES, but also in the MTS, is the development of consolidation centres. London will need more consolidation centres. These should also be developed alongside resource hubs that can then distribute the waste material. These could help avoid significant tonnages of waste that otherwise arise due to the (understandable) restrictions that are placed on the construction industry as to when they can get materials in and waste out. This could be seen as a parallel to reverse logistics within private sector supply chains.
183. Finally information sharing in this sector is key to continued improvement. The transition will have to be planned across all industries and sectors if London is to become a zero carbon, more self-sufficient, and less congested city with cleaner air.

# London Councils' TEC Executive Sub Committee

## Transport & Mobility Services Performance Information

Item No: 04

**Report by:** Tony O'Connor **Job title:** Mobility Services Manager

**Date:** 16 November 2017

**Contact Officer:** Tony O'Connor

**Telephone:** 020 7934 9501 **Email:** [tony.o'connor@londoncouncils.gov.uk](mailto:tony.o'connor@londoncouncils.gov.uk)

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**Summary:** This report details the London Councils Transport and Mobility Services performance information for Q1 and Q2 in 2017

**Recommendation:** Members are asked to note the report.

### Performance Monitoring and Reporting

1. London Councils provides a number of transport and mobility services on behalf of the London boroughs. These include London Tribunals, Freedom Pass, Taxicard, the London European Partnership for Transport, the London Lorry Control Scheme, the Health Emergency Badge scheme and providing a range of parking services and advice to authorities and the public.
2. Appendix 1 sets out the latest position against key performance indicators for each of the main services. This report covers Quarters 1 and 2 in 2017/18, and provides complete figures for 2016/17.

### Equalities Considerations

None.

### Financial Implications

None.

# APPENDIX 1: TRANSPORT & MOBILITY SERVICES: PERFORMANCE QUARTER 1

## LONDON TRIBUNALS

	Target (where appropriate)	2016/17 Full Year	2017/18 Q1	2017/18 Q2	Red / Amber / Green (RAG) rating Q2
<b>Environment and Traffic Adjudicators (ETA)</b>					
No. of appeals received	N/A	43,219	10,477	10,235	N/A
No. of appeals decided	N/A	38,678	8,835	9,832	N/A
% allowed	N/A	48%	50%	50%	N/A
% Did Not Contest	N/A	21%	26%	26%	N/A
% personal hearings started within 15 minutes of scheduled time	80%	87%	88%	88%	Green
Average number of days (from receipt) to decide appeals (postal)	56 days	36 days	28 days	27 days	Green
Average number of days (from receipt) to decide appeals (personal)	56 days	42 days	45 days	44 days	Green
Average number of days (from receipt) to decide appeals (combined)	56 days	38 days	34 days	32 days	Green
<b>Road User Charging Adjudicators (RUCA)</b>					
No. of appeals received	N/A	6,876	3,592	3,168	N/A
No. of appeals decided	N/A	6,331	2,807	2,482	N/A
% allowed	N/A	28%	44%	38%	N/A
% Did Not Contest	N/A	24%	35%	27%	N/A
% personal hearings started within 15 minutes of scheduled time	80%	84%	85%	82%	Green
Average number of days (from receipt) to decide appeals (postal)	56 days	56 days	47 days	54 days	Green*
Average number of days (from receipt) to decide appeals (personal)	56 days	48 days	43 days	59 days	Amber*
Average number of days (from receipt) to decide appeals (combined)	56 days	55 days	45 days	56 days	Green*
<b>Overall service</b>					
Notice of Appeal acknowledgments issued within 2 days of receipt	97%	99%	99%	100%	Green
Hearing dates to be issued to appellants within 5 working days of receipt	100%	99%	99%	100%	Green
Number of telephone calls to London Tribunals	N/A	35,778	9,779	10,888	N/A
% of calls answered within 30 seconds of the end of the automated message	85%	99%	99%	99%	Green

**Comment:**

\* The delay in deciding appeals in RUCA has increased for both personal and postal appeals as the number of appeals has increased. TfL changed contractors at the beginning of the year and have made other improvements in their own service resulting in as many appeals in the last 6 months as there were in the whole of last year. London Councils will be working with the Chief Adjudicator to see if we can reduce this delay.

**FREEDOM PASS**

	<b>Target (where appropriate)</b>	<b>2016/17 Full Year</b>	<b>2017/18 Q1</b>	<b>2017/18 Q2</b>	<b>Red / Amber / Green (RAG) rating Q2</b>
Number of active passes at end of period	N/A	1,238,168	1,226,207	1,229,760	N/A
Number of new passes issued (BAU)	N/A	40,380	10,501	10,644	N/A
Number of passes issued (2016 Renewal)	N/A	12,062	0	0	N/A
Number of replacement passes issued	N/A	83,638	19,955	20,618	N/A
Number of phone calls answered (BAU)	N/A	191,810	46,942	49,997	N/A
% Answered within 30 seconds (BAU)	85%	84%	83%	73%	Red*
Number of phone calls answered (2015 & 2016 Renewal)	N/A	3,753	0	0	N/A
% Answered within 30 seconds (2016 Renewal)	85%	83%	N/A	N/A	N/A
Number of letters, emails and faxes answered	N/A	37,001	11,534	12,364	N/A
Number of emails answered (2016 Renewal)	N/A	5,823	0	0	N/A

BAU = Business as Usual

**Comment:**

\*The percentage of calls answered within 30 seconds declined in Q2 due to contractor staffing issues and a higher than expected number of calls. Officers are working with the contractor to improve performance, particularly for the new contract, which started on 1 October 2017.

## TAXICARD

	Target (where appropriate)	2016/17 Full Year	2017/18 Q1	2017/18 Q2	Red / Amber / Green (RAG) rating Q2
Number of active passes at end of period	N/A	64,451	65,202	67,244	N/A
Number of new passes issued	N/A	8,309	1,687	2,205	N/A
Number of replacement cards issued	N/A	4,214	1,070	1,053	N/A
Number of phone calls answered at London Councils	N/A	36,374	8,323	7,226	N/A
% Answered within 30 seconds	85%	96.71%	96.40%	98.12%	Green
Number of journeys using Taxicard	N/A	1,276,481	333,839	323,817	N/A
% in private hire vehicles	N/A	12%	11%	10%	N/A
% of vehicles arriving within 15 minutes (advance booking)	95%	96.61%	96.64%	96.12%	Green
% of vehicles arriving within 30 minutes (on demand)	95%	97.18%	96.65%	96.98%	Green

### Comment:

\*The number of Taxicard journeys has increased marginally by 0.60% in Qs 1 & 2 compared to the same quarters in 2016/17. After a 4% increase in 2016/17 it appears that trip numbers have stabilised.

## TRACE (TOWAWAY, RECOVERY AND CLAMPING ENQUIRY SERVICE)

	Target (where appropriate)	2016/17 Full Year	2017/18 Q1	2017/18 Q2	Red / Amber / Green (RAG) rating Q2
Number of vehicles notified to database	N/A	44,612	10,042	10,601	N/A
Number of phone calls answered	N/A	17,430	3,589	3,444	N/A
% of calls answered within 30 seconds of the end of the automated message	85%	97%	95%	93%	Green

## LONDON LORRY CONTROL SCHEME

	Target (where appropriate)	2016/17 Full Year	2017/18 Q1	2017/18 Q2	Red / Amber / Green (RAG) rating Q2
Number of permits on issue at end of period	N/A	70,292	68,121	67,344	N/A
Number of permits issued in period	N/A	26,952	5,591	6,172	N/A
Number of vehicle observations made	10,800 per year 2,700 per quarter	14,459	3,793	3,298	Green
Number of penalty charge notices issued	N/A	6,033	1,278	1,017	N/A
Number of appeals considered by ETA	N/A	91	16	13	N/A
% of appeals allowed	Less than 40%	57%	56%	61%	Red*

### Comment:

\*The relatively low number of appeals means performance against this objective can fluctuate greatly. Allowed appeals include those that are not contested by London Councils as the enforcement authority. Appellants often do not provide evidence that vehicles were not in contravention until the appeal stage rather than at enquiry stage as they should do.

## TRANSACTIONAL SERVICES: DEBT REGISTRATIONS AND WARRANTS

	Target (where appropriate)	2016/17 Full Year	2017/18 Q1	2017/18 Q2	Red / Amber / Green (RAG) rating Q2
Traffic Enforcement Court: number of debt registrations	N/A	532,353	130,135	182,044	N/A
Traffic Enforcement Court: number of warrants	N/A	438,378	108,016	145,281	N/A
Traffic Enforcement Court: % registered in 1 day	97%	100%	N/A*	N/A*	N/A*

### Comment:

\*The Traffic Enforcement Centre (TEC) updated their validation rules in April 2017 without advance notification to London Councils or the boroughs, causing batch files sent by London Councils to TEC to fail. System development is required to resume business as usual. Files are being processed manually whilst the changes are agreed, scoped and implemented so the the SLA has been suspended.



## HEALTH EMERGENCY BADGES

	Target (where appropriate)	2016/17 Full Year	2017/18 Q1	2017/18 Q2	Red / Amber / Green (RAG) rating Q2
Number of badges on issue at end of period	N/A	3,848	3,797	3,726	N/A
Number of badges issued in period	N/A	3,797	304	443	N/A

## LONDON EUROPEAN PARTNERSHIP FOR TRANSPORT

	Target (where appropriate)	2016/17 Full Year	2017/18 Q1	2017/18 Q2	Red / Amber / Green (RAG) rating Q2
Number of Boroughs participating in EU transport funding projects	7	8	5	5	Amber

### Comment:

LEPT coordinated a bid on digital personalised travel planning under the Horizon 2020 calls for proposal: MG-4-1-2017: Increasing the take up and scale up of innovative solutions to achieve sustainable mobility solutions in urban areas.

The first stage bid was submitted on 25 January 2017. PTP-Commute was successfully evaluated at stage 1. LEPT have now submitted a full stage 2 proposal, the proposed budget for the project is €4,486,862.25. Horizon 2020 offers a funding rate of 100% on all costs for all non-profit organisations (including Local Authorities). The results of the final evaluation will be known by 27 May 2018. The project has enlisted the participation of 20 partners in an international consortium of cities, consultancies, private businesses, universities and NGOs and includes the London Borough of Haringey as a Champion City partner.

The 8 participating Boroughs in 2016/17 were: Barking and Dagenham (NoveLog), Hounslow (SWITCH), Newham (PASTA), Southwark, Lambeth (VeloCita), Westminster (Frevue) & (Freight Tales), Hackney (STARS) and Haringey (PTP-Cycle).

# London Councils' TEC Executive Sub-Committee

## Month 6 Revenue Forecast 2017/18      Item No 05

**Report by:** Frank Smith      **Job title:** Director of Corporate Resources  
**Date:** 16 November 2017  
**Contact Officer:** Frank Smith  
**Telephone:** 020 7934 9700      **Email:** Frank.smith@londoncouncils.gov.uk

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**Summary**      This report outlines actual income and expenditure against the approved budget to the end of September 2017 for TEC and provides a forecast of the outturn position for 2017/18. At this mid-year stage, a surplus of £1.001 million is forecast over the budget figure. In addition, total expenditure in respect of Taxicard trips taken by scheme members is forecast to underspend by a net figure of £809,000, if current trip volumes continue for the remainder of the year. The net borough proportion of this underspend is projected to be £613,000, with £196,000 accruing to TfL.

**Recommendations**      The Executive Sub-Committee is asked to :

- note the projected surplus of £1.001 million for the year, plus the forecast net underspend of £809,000 for overall Taxicard trips, as detailed in this report; and
  - note the projected level of Committee reserves, as detailed in paragraph 5 of this report and the commentary on the financial position of the Committee included in paragraphs 6-9.
-

## Report

1. This is the second budget monitoring report to be presented to the Committee during the current financial year. The next report will be the Month 9 figures (31 December 2017) for the year, which will be reported to the February 2018 meeting of this Committee.
2. The London Councils Transport and Environment Committee's income and expenditure revenue budget for 2017/18, as approved by the Full Committee in December 2016, is set out in Appendix A (Expenditure) and Appendix B (Income), as adjusted for the confirmation of borough funding and TfL funding for the Taxicard scheme for the year. In addition, carried forward sums from 2016/17 of £227,000 approved by this Sub-Committee in July 2017 have also been added to the revised budget for the current year, funded by additional transfers from reserves. The appendices show the actual income and expenditure at 30 September 2017 and a projection of the forecast outturn for the year, together with the projected variance from the approved budget.

## Variance from Budget

3. The current figures indicate that the Committee is projected to underspend gross expenditure budgets by £600,000 and achieve a surplus of income of £401,000 over the approved budget target for the year. These figures include offsetting amounts of £809,000 relating to payments and income for taxicard trips, plus additional payments and income for the registration of parking debt of £800,000, making an overall projected surplus of £1.001 million. Table 1 below summarises the forecast position, with commentary that details the trends that have began to emerge during the year to date and provides explanations for the variances that are projected.

**Table 1 –Summary Forecast as at 30 September 2017**

	<b>M6 Actual</b>	<b>Budget</b>	<b>Forecast</b>	<b>Variance</b>
<b>Expenditure</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>
Employee Costs	312	675	622	(53)
Running Costs	134	387	387	-
Central Recharges	-	90	90	-
<b>Total Operating Expenditure</b>	<b>446</b>	<b>1,152</b>	<b>1,099</b>	<b>(53)</b>
Direct Services	3,713	8,211	8,974	763
Research	-	40	40	-
Payments in respect of Freedom Pass and Taxicard	177,720	359,781	358,472	(1,309)
One-off payment to boroughs	-	340	340	-
<b>Total Expenditure</b>	<b>181,879</b>	<b>369,524</b>	<b>368,924</b>	<b>(600)</b>
<b>Income</b>				
Contributions in respect of Freedom Pass and Taxicard	(178,504)	(359,838)	(359,207)	631
Income for direct services	(3,064)	(8,650)	(9,684)	(1,034)
Core Member Subscriptions	(97)	(97)	(97)	-
Government Grants	-	-	-	-
Interest on Investments	(7)	-	(7)	(7)

Other Income	(52)	(84)	(75)	9
Transfer from Reserves	-	(855)	(855)	-
<b>Total Income</b>	<b>(181,724)</b>	<b>(369,524)</b>	<b>(369,925)</b>	<b>(401)</b>
<b>Net Expenditure</b>	<b>155</b>	<b>-</b>	<b>(1,001)</b>	<b>(1,001)</b>

4. The projected surplus of £1.001 million is made up broadly of the following:

- A projected overall surplus of £246,000 in respect of TEC parking traded services, after considering an estimate of the level of borough/TfL/GLA usage volumes during the year to date. This is attributable to a number of areas.
  - Firstly, there is a projected net surplus of £229,000 in respect of parking and traffic appeals. The estimated number of notice of appeals and statutory declarations received to date amounts to 17,199, giving a projected number for the year of 41,278, 692 more than the budgeted figure of 40,586. The current indicative throughput of appeals is 3.14 appeals per hour, compared to a budget figure of 2.7.
  - Secondly, the transaction volumes for other parking systems used by boroughs and TfL to date are projected to result in a net deficit of £23,000; and
  - Finally, the fixed cost element of the RUCA contract with the GLA/TfL is projected to generate additional income of £42,000, due to an increased share of the rechargeable costs of Chancery Exchange attributable to RUCA activities.
- A projected marginal overspend of £6,000 in respect of employee costs. The cost of staff providing direct services (included within the direct services administration charge) is estimated to overspend by £30,000, although this is offset by an underspend on staffing costs attributable to non-operational and policy staff of £24,000. In addition, the maternity cover budget is estimated to be underspent by £30,000.
- A reduction of £34,000 in respect of the estimated Business Rates payable in respect of the hearing centre at Chancery Exchange, arising from the actual bill for 2017/18 being less than the projected increase calculated at the budget setting stage in November 2016.
- A projected underspend of £400,000 in respect of the £1.7 million budget for payments to independent bus operators, which is based on claims to date and a forecast of 4% increase on average fares. In addition, four of the current operators are new and although there is an assumed 1% increase in journeys on these routes, it is difficult to accurately predict future trends as it takes time for the new operators to build up patronage. However, there is an overall underlying reduction in bus ridership.
- A projected underspend of £120,000 in respect of the £1.518 million budget for the issuing/reissuing costs of Freedom Passes and undertaking the mid-term review during 2017/18.
- Based on income collected to date, receipts from Lorry Control PCN income are forecast to breakeven against the budget of £800,000.

- Based on income collected to date, income receipts from replacement Freedom Passes are forecast to exceed the budget of £600,000 by £183,000. For replacement Taxicards, there is a projected deficit on the £24,000 income budget of £5,000 for the year.

## Committee Reserves

5. Table 2 below updates the Committee on the projected level of reserves as at 31 March 2018, if all current known liabilities and commitments are considered. This takes into account the adjustment of £195,000 arising out of the external audit of the 2016/17 accounts:

**Table 2– Analysis of Projected Uncommitted Reserves as at 31 March 2018**

	<b>General Reserve</b>	<b>Specific Reserve</b>	<b>Total</b>
	<b>£000</b>	<b>£000</b>	<b>£000</b>
<b>Audited reserves at 1 April 2017</b>	<b>3,341</b>	<b>1,734</b>	<b>5,075</b>
Transfer between reserves	(1,000)	1,000	-
One-off payments to boroughs 2017/18	(340)	-	(340)
Approved in setting 2017/18 budget (December 2016)	(288)	-	(288)
Carried forward amounts from 2016/17	(227)	-	(227)
Projected Budget Surplus 2017/18	698	303	1,001
<b>Estimated Residual Balances at 31 March 2018</b>	<b>2,184</b>	<b>3,037</b>	<b>5,221</b>

## Conclusions

6. This report reflects the position at the mid-point stage in the current financial year and forecasts a surplus position of £1.001 million for the year. In addition taxicard trips are forecast to underspend by £809,000, with the borough proportion of this underspend projected to be £613,000, with £196,000 accruing to TfL.
7. The majority of the projected surplus is attributable to a projected net surplus on trading operations based on transaction volumes to date, an underspend on Freedom Pass issue costs and a reduction in bus ridership plus additional projected income from replacement Freedom Passes.
8. After taking into account the forecast surplus and known commitments, general reserves are forecast to be £2.184 at the year-end, which equates to 17.8% of revised budgeted operating and trading expenditure of £12.272 million. This figure currently exceeds the Committee's formal policy on reserves, agreed in November 2015 that reserves should equate to between 10-15% of annual operating expenditure. The budget proposals, which are subject to a separate report on this agenda, recommend the transfer of £289,000 to the revenue account to balance the budget for 2018/19. If this Sub-Committee is minded to recommend this proposal to the main meeting of TEC in December, and if this recommendation is approved by the main Committee, uncommitted reserves would reduce to £1.895 million, which would equate to 16.2% of the proposed operating and trading expenditure for 2018/19, marginally above the benchmark indicator.
9. In addition, a sum of £3.037 million is projected to be held in the specific reserve - £2.837 million in respect of the 2020 freedom Pass issue and £200,000 in respect of TEC special projects to be prioritized by the main Committee.

## **Recommendations**

10. Members are asked to :

- note the projected surplus of £1.001 million for the year, plus the forecast underspend of £809,000 for overall Taxicard trips, as detailed in this report; and
- note the projected level of Committee reserves, as detailed in paragraph 5 of this report and the commentary on the financial position of the Committee included in paragraphs 6-9.

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## **Financial Implications for London Councils**

As detailed in report

## **Legal Implications for London Councils**

None

## **Equalities Implications for London Councils**

None

## **Appendices**

Appendix A (Expenditure), Appendix B (Income)

## **Background Papers**

London Councils-TEC Budget working papers 2017/18

London Councils Income and Expenditure Forecast File 2017/18



## TEC M6 Expenditure Forecast 2017/18

## Appendix A

	Revised 2017/18 £000	Month 6 ATD £000	Month 6 Forecast £000	Month 6 Variance £000
<b>Payments in respect of Concessionary Fares</b>				
TfL	324,181	161,766	324,181	0
ATOC	18,872	9,436	18,872	0
Other Bus Operators	1,700	486	1,300	-400
Freedom Pass issue costs	1,518	254	1,398	-120
Freedom Pass Administration	484	242	485	1
City Fleet Taxicard contract	12,499	5,263	11,690	-809
Taxicard Administration	527	273	546	19
	359,781	177,720	358,472	-1,309
<b>TEC Trading Account Expenditure</b>				
Payments to Adjudicators	1,173	456	1,094	-79
Northgate variable contract costs	518	293	584	66
Payments to Northampton County Court	3,000	1,912	3,800	800
Lorry Control Administration	709	358	715	6
ETA/RUCA Administration	2,769	684	2,738	-31
HEB Expenditure	43	10	43	0
	8,211	3,713	8,974	763
<b>Sub-Total</b>	<b>367,993</b>	<b>181,433</b>	<b>367,446</b>	<b>-547</b>
<b>Operating Expenditure</b>				
<b>Contractual Commitments</b>				
NG Fixed Costs	89	45	89	0
	89	45	89	0
<b>Salary Commitments</b>				
Non-operational staffing costs	626	302	603	-23
Members	19	10	19	0
Maternity Provision	30	0	0	-30
	675	312	622	-53
<b>Other Commitments</b>				
Supplies and service	297	89	297	0
Research	40	0	40	0
One off payment to boroughs	340	0	340	0
	677	89	677	0
<b>Total Operating Expenditure</b>	<b>1,441</b>	<b>446</b>	<b>1,388</b>	<b>-53</b>
<b>Central Recharges</b>	<b>90</b>	<b>0</b>	<b>90</b>	<b>0</b>
<b>Total Expenditure</b>	<b>369,524</b>	<b>181,879</b>	<b>368,924</b>	<b>-600</b>

	Revised 2017/18 £000	Month 6 ATD £000	Month 6 Forecast £000	Month 6 Variance £000
Borough contributions to TfL	324,181	161,766	324,181	0
Borough contributions to ATOC	18,872	9,346	18,872	0
Borough contributions to other bus operators	1,700	850	1,700	0
Borough contributions to FP issue costs	1,518	759	1,518	0
Borough contributions to freedom pass administration	0	0	0	0
Income from replacing lost/faulty freedom passes	600	391	783	-183
Income from replacing lost/faulty taxicards	24	9	19	5
Borough contributions to Comcab	2,409	1,380	1,796	613
TfL contribution to Taxicard scheme	10,090	3,669	9,894	196
Borough contributions to taxicard administration	334	334	334	0
TfL Contribution to taxicard administration	110	0	110	0
	359,838	178,504	359,207	631
<b>TEC trading account income</b>				
Borough contributions to Lorry ban administration	0	0	0	0
Lorry ban PCNs	800	390	800	0
Borough parking appeal charges	957	459	1,101	-144
TfL parking appeal charges	238	60	243	-5
GLA Congestion charging appeal income	313	38	383	-70
Borough fixed parking costs	2,190	525	2,190	0
TfL fixed parking costs	214	54	214	0
GLA fixed parking costs	454	55	496	-42
Borough other parking services	484	129	457	27
Northampton County Court Recharges	3,000	1,354	3,800	-800
	8,650	3,064	9,684	-1,034
<b>Sub-Total</b>	<b>368,488</b>	<b>181,568</b>	<b>368,891</b>	<b>-403</b>
<b>Core borough subscriptions</b>				
Joint Committee	46	46	46	0
TEC (inc TfL)	51	51	51	0
	97	97	97	0
<b>Other Income</b>				
TfL secretariat recharge	41	31	31	10
Investment income	0	7	7	-7
Other income	0	2	5	-5
Sales of Health Emergency badges	43	19	39	4
	84	59	82	2
<b>Transfer from Reserves</b>	<b>855</b>	<b>0</b>	<b>855</b>	<b>0</b>
<b>Central Recharges</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Total Income Base Budget</b>	<b>369,524</b>	<b>181,724</b>	<b>369,925</b>	<b>-401</b>

# London Councils' TEC Executive Sub-Committee

## Draft Revenue Budget and Borough Charges 2018/19 Item no: 06

<b>Report by:</b>	Frank Smith	<b>Job title:</b>	Director of Corporate Resources
<b>Date:</b>	16 November 2017		
<b>Contact Officer:</b>	Frank Smith		
<b>Telephone:</b>	020 7934 9700	<b>Email:</b>	frank.smith@londoncouncils.gov.uk

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### Summary

This report details the outline revenue budget proposals and the proposed indicative borough subscription and charges for 2018/19.

The Executive Sub-Committee is asked to comment on these outline proposals, with particular consideration to the three specific proposals detailed at paragraph 4, in order that any comments can be consolidated in the further report for the main TEC meeting in December, where the detailed budget proposals and levels of subscriptions and charges for 2018/19 will be presented for approval.

### Recommendations

The Executive-Sub Committee is asked to recommend that the main Committee approve at their meeting on 7 December:

- The proposed individual levies and charges for 2018/19 as follows:
  - The Parking Core Administration Charge of £1,500 per borough and for TfL (2017/18 - £1,500; paragraph 38);
  - The Parking Enforcement Service Charge of £0.4226 per PCN which will be distributed to boroughs and TfL in accordance with PCNs issued in 2016/17 (2017/18 - £0.4915 per PCN; paragraphs 36-37);
  - No charge to boroughs in respect of the Freedom Pass Administration Charge, which is covered by replacement Freedom Pass income (2017/18 – nil charge; paragraph 15);
  - The Taxicard Administration Charge to boroughs of £338,182 in total (2017/18 - £338,182; paragraphs 17).
  - No charge to boroughs in respect of the Lorry Control

Administration Charge, which is fully covered by estimated PCN income (2017/18 – nil charge; paragraphs 19-20);

- Road User Charging Appeals (RUCA) – to be recovered on a full cost recovery basis under the new contract arrangements with the GLA (paragraph 28);
- In addition, after considering the specific proposals outlined at paragraph 4, the Executive-Sub Committee is also asked to recommend that the main Committee approve at their meeting on 7 December:
  - A unit charge of £12 for the replacement of a lost or damaged Freedom Pass (2017/18 - £10; paragraph 10);
  - Environment and Traffic Appeals (ETA) charge of £30.63 per appeal or £27.02 per appeal where electronic evidence is provided by the enforcing authority (2017/18 - £32.00/£28.50 per appeal). For hearing Statutory Declarations, a charge of £25.21 for hard copy submissions and £23.53 for electronic submissions (2017/18 - £26.74/£26.06 per SD) (paragraph 27);
  - The TRACE (Electronic) Charge of £7.53 per transaction (2017/18 - £7.31; paragraphs 29-35);
  - The TRACE (Fax/Email) Charge of £7.70 per transaction, which from 1 April 2018 would be levied, in addition to the electronic charge of £7.53 per transaction, making a total of £15.23 (2017/18 - £7.48; paragraphs 29-35);
  - The TEC<sup>1</sup> Charge of £0.175 per transaction (2017/18 - £0.17; paragraphs 29-35).
- The provisional gross revenue expenditure of £368.775 million for 2018/19, as detailed in Appendix A; and
- On the basis of the agreement of all the above proposed charges as outlined in this report (including those at paragraph 4), the provisional gross revenue income budget of £368.486 million for 2018/19, with a recommended transfer of £289,000 from uncommitted Committee reserves to produce a balanced budget, as shown in Appendix B.

The Executive-Sub Committee is also asked to note:

- the current position on reserves, as set out in paragraphs 52-55 and Table 9 of this report; and
- the estimated total charges to individual boroughs for 2018/19, as set out in Appendix C.1.

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<sup>1</sup> The system that allows boroughs to register any unpaid parking tickets with the Traffic Enforcement Centre and apply for bailiff's warrants.

## **Introduction**

1. This report details the outline revenue budget proposals and the proposed indicative borough subscription and charges for 2018/19. The reports seeks comments from the Executive Sub-Committee in order that recommendations can be made to the main Committee meeting in December, who will formally set the budget and the associated level of subscriptions and charges for 2018/19.
2. The report will, therefore, examine the key features of the proposed budget for 2018/19 and make proposals as to the level of charges for the Committee's consideration.

## **Proposed Revenue Budget 2018/19 – Provisional Overview**

3. The budget proposals in this report incorporate the following assumptions:
  - A reduction in the TfL element of the Freedom Pass settlement for 2018/19 of £865,000, or 0.27% (subject to further negotiation);
  - An increase in the Rail Delivery Group (formerly ATOC) element of the freedom pass settlement of £681,000 (3.61%);
  - The budget for payments to other bus operators for local journeys originating in London has been reduced from the current year's level of £1.7 million to £1.5 million, following projections for 2018/19, based on current claim trends being lodged by operators.
  - The annual Freedom Pass survey and reissue costs budget to remain at the current year's level of £1.518 million, which will be able to contain the increases in contract prices arising from the recent tender exercise;
  - Subject to its annual business plan approval process, TfL will provide an estimated fixed contribution of £10.292 million, inclusive of an assumed annual Taxicard tariff inflation of £202,000 (2%), compared to £10.090 million for 2017/18. At this stage, the total borough contribution towards the Taxicard scheme in 2018/18 is estimated to be £2.409 million, the same as for the current year, although the decision on boroughs' contributions is a matter for boroughs to take individually and will be confirmed in February 2018. The indicative budgetary provision for the taxicard trips contract with CityFleet Networks Limited, will, therefore, be an amalgam of the TFL and borough funding, currently equating to £12.701 million for 2018/19, a provisional increase of £202,000 on the revised budget of £12.499 million for the current year;
  - A continued nil charge to boroughs in respect of the Freedom Pass administration fee, which remains fully funded by income receipts from replacing Freedom Passes that are lost or damaged;
  - A continued nil charge to boroughs in respect of the London Lorry Control scheme, which remains fully financed from PCN income receipts. The income budget for such receipts is proposed to remain at £800,000 for 2018/19. A sum of £50,000 will remain in the budget to fund further work on the development of the Lorry Control scheme during 2018/19, as a result of the recent scheme review;

- The total Taxicard administration charge of £338,182 being held at the current year's level, which will be apportioned to boroughs in accordance with the total scheme membership as at 30 September 2017;
- The Parking Core administration charge being held at the 2017/18 level of £1,500;
- A reduction in the Parking Enforcement service charge of £0.0689 per PCN, or 14%, which will be apportioned to boroughs and TfL in accordance with the total number of PCNs issued by enforcing authorities in 2016/17;
- An estimated 1½% cost of living increase on all officer salary costs and 1% in respect of adjudicators' fees. A provision of 2% is also required to cover the employers' pension contributions for adjudicators who have been automatically enrolled into a pension scheme and have elected to remain within the scheme. The overall staffing budget continues to include a £30,000 provision for maternity cover and the vacancy level remains at 2%; and
- A 3% inflationary increase in all other running cost budgets for 2018/19, unless subject to binding contractual increases.

#### **Additional specific proposals for 2018/19**

4. Taking into account the draft proposals and provisional overview highlighted in paragraph 3 above, if these were to be agreed by the main Committee in December, there would be an indicative budget deficit of £141,000 for 2018/19. This would be the position after the transfer of £288,000 from uncommitted general reserves, the same amount approved by the main Committee for the current financial year to balance the budget. The indicative deficit could be managed by the transfer of an additional £141,000 from uncommitted reserves. However, this would lead to a total transfer of £429,000 from reserves, which is clearly not a sustainable budget strategy in the medium to long term, and for that reason is not recommended by the Director of Corporate Resources. Officers have, therefore, identified three areas where it would be possible to increase charges to users in order to eliminate the projected deficit of £141,000. These are:
  - To increase the unit cost of a replacement Freedom Pass by £2 from £10 to £12. The cost has not increased since it was introduced in November 2012 and the proposed increase would offset some of the increased direct service administration contract costs reported to the main TEC meeting in March 2017. There would be an estimated 5% falloff in the base number of replacement passes issued due to the proposed increase. The income budget for such receipts would, therefore, increase by a net figure of £84,000 to £684,000 for 2018/19;
  - To top slice the forecast reductions in the unit cost of all ETA appeals and statutory declarations by £1. The forecast reductions are based on significantly improved performance levels, which have been achieved through systems and service improvements over the past 12 months. If the proposed £1 top slice is approved, this would still reduce the unit cost of hard copy parking appeals charged to boroughs and TfL by a net figure of £1.37 per appeal, or 4.29%. For appeals where evidence is submitted electronically, the



unit cost will reduce by £1.48 or 5.18%. For statutory declarations, a hard copy transaction will reduce by £1.53 or 5.71%, with electronic transactions reducing by £1.57 or 6.01%. This measure will build in a degree of contingency given fluctuations in the number of appeals observed in the year to date and allow for unforeseen in-year costs, as well as raising a projected additional £42,000 income in 2018/19; and

- A 3% increase in the charges to boroughs for TEC and TRACE electronic transactions and the phasing out of TRACE fax and email transactions for purposes other than disaster recovery<sup>2</sup>. Changes to the standard charges (TEC and TRACE electronic charges) reflect anticipated increases in contract costs during 2018/19, which will raise an additional £15,000 in 2018/19. Phasing out of TRACE fax and emails is part of London Councils wider programme of channel shift in relation to the ETA Tribunal. These charges have not been increased to users since 2010/11.
5. The following paragraphs detail the main proposed budget headings for 2018/19 and highlight any significant changes over 2017/18. The proposed level of expenditure for 2018/19 amounts to £368.775 million. A sum of £357.070 million relates to direct expenditure on the transport operators providing the Freedom Pass and the Taxicard schemes, leaving a sum of £11.705 million relating to expenditure on parking and traffic related traded service and other operating expenditure. This compares to a revised budget figure of £12.272 million for the current year, a reduction of £567,000, or 4.6%.

## **Freedom Pass**

6. The main settlement with TfL for concessionary travel on its service is estimated to be £323.316 million, although the final figure is subject to further negotiations. This represents a provisional cash reduction of £865,000, or 0.27%, on the figure of £324.181 million for 2017/18. On a gross costs basis the settlement is down by 0.1%. Members will recall that last year's settlement included a one off adjustment to account for the introduction of the Mayor's bus hopper fare. When the effect of this is factored out of last year's settlement the true year on year reduction is 1%. This is made up of a 2.3% reduction in total journeys (although some modes such as DLR saw increases), offset by real fares demand change<sup>3</sup> of just over 1%.
7. The ATOC (now Rail Delivery Group (RDG)) settlement is based on a further two year extension to the settlement agreed in 2011. The agreement extension allows for inflationary increases at July RPI +1.75% (3.61%). This leads to an increase of £681,000 to £19.553 million over the budget of £18.872 million for the current year.
8. The budget for payments to other bus operators for local journeys originating in London has been reduced by £200,000 from the current year's level of £1.7

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<sup>2</sup> London Councils will continue to accept TRACE email and fax during the 2018/19 financial year, but notices sent in this way will be charged the fax / email rate in addition to the electronic rate, as this method causes significant additional effort for London Councils and its contractor.

<sup>3</sup> This factors in the effect of a 3.3% inflationary increase on demand in the absence of increased ticket prices i.e. if prices in the wider economy increase, but travel fares do not, the price of travel becomes relatively cheaper and the demand for travel increases. This effect impacts the settlement and offsets decreasing journey numbers.

million to £1.5 million, following projections for 2018/19, based on previous years' outturn and the wider decline in bus ridership.

9. The budget for pass issue and support services remains at £1.518 million, which is intended to provide sufficient headroom to allow for the new contract rates advertised to TEC in March 2017 and any additional development and maintenance work to be carried out on the Freedom Pass web service and customer relationship management system. The budget will continue to be reviewed each year in the light of estimated annual reissue numbers in the run up to the next substantive reissue exercise in 2020.
10. For income in respect of replacement Freedom Passes, current trends indicate that significant income continues to accrue. Subject to specific member approval as outlined in paragraph 4, it is proposed to increase the unit cost of a replacement pass by £2 from £10 to £12 from 1 April 2018. However, it is estimated that there will be a 5% falloff in overall income arising from behavioural change due to the price increase, so the net increase in income will be £84,000, increasing the budget to £684,000 and contributing to the setting of a balanced budget for the year. As stated in paragraph 3 and detailed in paragraph 15 below, it is proposed that the in-house cost of administering the Freedom Pass scheme will be fully funded by this income stream in 2018/19.
11. As agreed by this Committee in December 2014, any annual surplus arising from both the freedom pass issuing costs budget of £1.518 million (paragraph 9 above) and replacement freedom passes income budget of £684,000 (paragraph 10 above) will be transferred to a specific reserves to accumulate funds to offset the cost of the next major pass reissue exercise scheduled for 2020. The current projected balance on this element of the specific reserve is £2.837 million, as highlighted in paragraph 52.
12. Final negotiations on the actual amounts payable to transport operators will be completed in time for the meeting of the main Committee on 7 December and any late variations to these provisional figures will be tabled at this meeting.
13. A summary of the provisional freedom pass costs for 2018/19, compared to the actual costs for the current year, are summarised in Table 1 below:

**Table 1 – Comparative cost of Freedom Pass 2018/19 and 2017/18**

<b>Estimated Cost of Freedom Pass</b>	<b>2018/19(£000)</b>	<b>2017/18(£000)</b>
TfL Settlement	323,316	324,181
ATOC Settlement	19,553	18,872
Non TfL Bus Operators Settlement	1,500	1,700
Support services and issue costs	1,518	1,518
<b>Total Cost</b>	<b>345,887</b>	<b>346,271</b>

14. The total cost of the scheme is fully funded by boroughs and the estimated cost payable by boroughs in 2018/19 is £345.887 million, compared to £346.271 million payable for 2017/18. This represents a reduction of £384,000 or 0.11%. The majority of costs payable by boroughs will be apportioned in accordance with usage data, in accordance with the agreed recommendations of the arbitrator in 2008.
15. The administration of the freedom pass covers London Councils in-house costs in negotiating the annual settlements and managing the relationships with transport

operators and contractors. For 2018/19, the total cost is estimated to be £478,830, compared to £483,814 in 2017/18. This equates to £14,450 per borough. However, it is proposed to continue to use income accruing from the replacement of lost and damaged Freedom Passes (refer paragraph 10) to continue to levy a nil charge in 2018/19, which members are asked to recommend to the main Committee. This position will be reviewed annually to ensure forecast income streams continue to cover the in-house costs of administering the scheme.

## **Taxicard**

16. As stated in paragraph 3, TfL will provide an estimated fixed contribution of £10.292 million, inclusive of an assumed annual Taxicard tariff inflation of £202,000 (2% - to be confirmed), compared to £10.090 million for 2017/18. At this stage, the total borough contribution towards the Taxicard scheme in 2018/19 is estimated to be £2.409 million, the same as for the current year, although the decision on boroughs' contributions is a matter for boroughs to take individually and will be confirmed in February 2018. The indicative budgetary provision for the taxicard trips contract with CityFleet Networks Limited, will, therefore, be an amalgam of the TfL and borough funding, currently equating to £12.701 million for 2018/19, a provisional increase of £202,000 on the revised budget of £12.499 million for the current year. Members should note that this contract is currently out to tender and the budget is based on current contract rates, which could change.
17. The gross cost of administration of the Taxicard Scheme is estimated to be £537,006 in 2018/19 compared to £526,694 in 2017/18. After excluding an estimated separate contribution from TfL towards these administrative costs of £112,155 and anticipated income of £21,000 from charging for replacement taxicards, the net cost chargeable to boroughs in 2018/19 is £403,851. However, it is proposed to continue to use uncommitted general reserves held by the Committee of £65,669 to hold the total charge to boroughs at the 2017/18 level of £338,182.
18. The active Taxicard total membership as at 30 September 2018 is 67,244, compared to 64,611 as at 30 September 2016, an increase of 2,633, or 4.1%. The increase in the spreading base has reduced the underlying subsidised unit cost of a permit from £5.24 to £5.03 per member.

## **Lorry Control Scheme**

19. The total charge is calculated in the same manner as the Freedom Pass and taxicard administration charge, although it is apportioned to boroughs in accordance with the ONS mid-year population figures for, in the case of 2018/19, June 2016. The total cost of administering the scheme is estimated to be £706,738 in 2018/19, compared to £672,708 in 2017/18. This figure includes a sum of £50,000 that has been retained in anticipation of further development of the scheme in 2018/19.
20. After analysing receipts from PCNs issued in relation to the scheme over the past three financial years, it is proposed to keep the income forecast at £800,000 for 2018/19, meaning that there will be a continuation of the nil charge to the 29 participating boroughs plus TfL towards the scheme in 2018/18. Again, this

position will be reviewed annually to ensure forecast income streams continue to cover the costs of administering the scheme.

### **Environment and Traffic Adjudicators (ETA) Fees**

21. The budget for adjudicators' fees and training will be increased for 2018/19, in accordance with the recommendation of the Senior Salaries Review Board in respect of the 2017 pay award. This mechanism, which was agreed by TEC in November 2001, keeps the Adjudicators' pay at 80% of that for Group 7 full-time judicial appointments outside London. This hourly rate increases by £0.61, or 1% from £61.21 to £61.82, inclusive of employers' National Insurance Contributions. In addition, all adjudicators have been entitled to be provided with a workplace pension scheme from August 2017. The employers' contribution to the scheme offered to the adjudicators will be 2% from 1 April 2018. Current estimates indicate that 80% of ETA adjudicators will be eligible to remain in the scheme under current earnings eligibility rules. This will add a further 1.6% onto the payroll cost in 2018/19, giving an average hourly rate of £62.81.
22. The estimated volume of ETA appeals and statutory declarations for 2018/19, based on volumes generated in the first five months of 2017/18 is 41,278, slightly higher than the 40,586 budgeted level for the current year. The actual number of appeals heard in 2016/17 was 41,855 including Statutory Declarations, Moving Traffic Contraventions and Lorry Control Appeals, indicating that the current number of ETA appeals is relatively stable.
23. The average throughput of appeals for the first five months of the current year is 3.14 appeals heard per hour (compared to 2.7 appeals per hour when the current year's budget was set in December 2016). This average figure takes account of all adjudicator time spent on postal and personal appeal hearing and also non-appeal 'duty adjudicator' activities. The increase in throughput is attributable to system and service improvements introduced during 2016/17 that is now feeding through into the processing figures. The ETA adjudicator fees base budget of £920,100 has, therefore, been reduced by £114,967 to £805,133 for 2018/19 to reflect the current volumes and throughput rate, and then inflated by £21,062 to £826,195 to reflect the pay award and the estimated effect of enrolment to the adjudicators' pension scheme.

### **Road User Charging Adjudicators (RUCA) Fees**

24. The estimated volume of RUCA appeals for 2018/19, based on current trends is 7,800, compared to 6,348 for the current year. This estimate is based on forecasting done with the GLA and reflects an increase to take into account more effective enforcement and a likely increase in appeal numbers following the implementation of the emissions surcharge in October 2017. The actual number of RUCA Appeals dealt with in 2016/17, including Statutory Declarations, was 6,602.
25. The budget for RUCA adjudicators' fees has, therefore, been increased by £26,000 from £253,000 to £279,000 for 2018/19 to reflect current costs, and then inflated by £7,000 to £286,000 to reflect the assumed pay award and pensions provision obligation. The Committee will be fully reimbursed at cost by the GLA/TfL for the hearing of RUCA appeals under the current contract arrangements.

## Appeals Unit Charges 2018/19

26. The estimated overall cost for hearing appeals for 2018/19 is laid out in Table 2 below:

**Table 2 – Proposed Unit Cost for Appeals 2018/19**

	<b>ETA</b>	<b>RUCA</b>	<b>Total</b>
<b>Estimated Appeal Nos.</b>	<b>41,278</b>	<b>7,800</b>	<b>49,078</b>
<b>Average Case per hour</b>	<b>3.14</b>	<b>1.71</b>	<b>2.77</b>
<b>Adjudicator Hours</b>	<b>13,154</b>	<b>4,549</b>	<b>17,703</b>
<b>Expenditure</b>			
Adjudicators Fees	826,195	285,725	1,111,920
Admin Variable Cost	297,606	67,308	364,914
<b>Total</b>	<b>1,123,801</b>	<b>353,033</b>	<b>1,476,834</b>
<b>Income</b>			
Hearing Fees	1,165,080	353,033	1,518,113
<b>Average Indicative Unit Cost of Appeal</b>	<b>27.23</b>	<b>45.26</b>	<b>30.09</b>

27. Subject to specific member approval as outlined in paragraph 4, for ETA appeals, based on an estimated 41,278 appeals and a projected throughput rate of 3.14 cases being heard per hour during 2018/19, it is proposed that the indicative hard copy unit ETA appeal cost for 2018/19 is £30.63, a reduction of £1.37 or 4.29% on the charge of £32.00 for 2017/18. For appeals where electronic evidence is provided by an enforcing authority, it is proposed that the unit cost will reduce by £1.48 to £27.02. The lower charge to boroughs recognises the reduced charge from London Councils contractor for processing electronic appeals, demonstrating that there remains a clear financial incentive for boroughs to move towards submitting electronic evidence under the current contract arrangements. Boroughs will pay a differential charge for the processing of ETA statutory declarations. For hard copy statutory declarations, the proposed unit charge will be £25.21 compared to the charge of £26.74 for the current year, which represents a reduction of £1.53, or 5.71%. For electronic statutory declarations, the proposed unit charge will be £24.49, a reduction of £1.57, or 6.01% on the electronic appeal unit charge for the current year. This proposal will create an estimated surplus of appeals income over projected expenditure of £42,000 and contribute towards delivering a balanced budget for TEC for the year. The Executive Sub-Committee is asked, therefore, to recommend that the main Committee approve these appeal charges to users for 2018/19.
28. London Councils is contracted to provide the RUCA appeals service up until January 2022 under the current contract arrangements effective from 1 January 2017. There is a continuation of the previous agreement for TfL/GLA to reimburse London Councils on an actual cost-recovery basis for the variable cost of these transactions, rather than on a unit cost basis. Continuation of this agreement will ensure that a breakeven position continues in respect of these transactions, so the estimated cost of £353,033 for hearing an estimated 7,800 RUCA appeals will be fully recovered. The fixed cost element of the new contract is £497,372, an increase of £43,761 of the recharge of £453,611 for 2017/18, due to an increase in the proportion of RUCA appeals in relation to the overall number of appeals.

## Parking Managed Services – Other Variable Charges to Users

29. These variable charges form part of the parking managed service contract provided by Northgate, the volumes of which the Committee has no control. The individual boroughs are responsible for using such facilities and the volumes should not, therefore, be viewed as service growth. The volumes are based on those currently being processed by the contractor and are recharged to the boroughs and TfL as part of the unit cost charge. Current trends during the first five months of 2017/18 suggest that the TRACE electronic transactions have slightly increased but that TRACE Fax transactions have reduced by nearly 30%. Comparable figures indicate that use of the TEC system by boroughs has increased by 15% over 2017/18. The estimated effect on expenditure trends are illustrated in Table 3 below:

**Table 3 – Estimated expenditure on variable parking services 2018/19 and 2017/18**

<b>2018/19</b>	<b>Estimated Volumes (Nos)</b>	<b>Contractor Charge (£)</b>	<b>Expenditure Budget (£)</b>
TRACE (Electronic)	34,064	1.737/1.789	60,525
TRACE (Fax Transaction)	7,215	3.825/3.94	28,207
TEC	1,068,010	0.092/0.948	100,691
<b>Total</b>			<b>189,422</b>
<b>2017/18</b>	<b>Estimated Volumes (Nos)</b>	<b>Contractor Charge (£)</b>	<b>Expenditure Budget (£)</b>
TRACE (Electronic)	33,804	1.698/1.732	58,269
TRACE (Fax Transaction)	10,614	3.739/3.814	40,301
TEC	926,540	0.09/0.92	84,790
<b>Total</b>			<b>183,359</b>

30. The estimated increase in expenditure between 2017/18 and 2018/19 based on the current projected transaction volumes for 2018/19 and estimated movement in contract prices is £6,063.
31. The corresponding estimated effect on income trends are illustrated in Table 4 below:

**Table 4 – Estimated income accruing from variable parking services 2018/19 and 2017/18**

<b>2018/19</b>	<b>Estimated Volumes (Nos)</b>	<b>Proposed Unit Charge (£)</b>	<b>Income Budget (£)</b>
TRACE (Electronic)	34,064	7.53	256,502
TRACE (Fax Transaction)	7,215	7.70	55,552
TEC	1,068,010	0.175	186,902
<b>Total</b>			<b>498,955</b>
	<b>Estimated</b>		<b>Income</b>



<b>2017/18</b>	<b>Volumes (Nos)</b>	<b>Actual Unit Charge (£)</b>	<b>Budget (£)</b>
TRACE (Electronic)	33,804	7.31	247,107
TRACE (Fax Transaction)	10,614	7.48	79,393
TEC	926,540	0.17	157,512
<b>Total</b>			<b>484,012</b>

32. The corresponding estimated effect on income, between 2017/18 and 2018/19, based on the current projected transaction volumes for 2018/19 and a 3% increase in charges to users, is an increase of £14,943, leading to a net overall increase in budgeted income of £8,881. The charging structure historically approved by TEC for the provision of the variable parking services (excluding appeals) includes a profit element in each of the charges made to boroughs and other users for these services. The charges to boroughs have not been reviewed since 2010/11 and with increases of up to 3% expected at the next contract anniversary date in July 2018, it is proposed to increase the three charges to boroughs by 3% for 2018/19, subject to specific member approval as outlined in paragraph 4.
33. In addition to the 3% increase in charges in relation to parking services, London Councils proposes from 1 April 2018 to begin phasing out TRACE fax and email as a default means for enforcement authorities to notify the service of vehicles that have been moved. The reasons for this are two-fold. First, it is part of London Councils channel shift programme. Second, the fax and email option was intended at the start of the contract with NPS in July 2015 to be used as a disaster recovery option only. However, use of this method has increased over the past few years, increasing the amount of manual effort required to process information sent by enforcement authorities.
34. In order to encourage enforcement authorities to use the electronic notification systems by default and thereby reduce processing time, London Councils proposes from 1 April 2018 to charge all TRACE fax and email notifications at the electronic rate (£7.53) plus the fax/email rate (£7.70) making a total of £15.23 per transaction. The fax and email option will remain open for enforcement authorities to use, and will be in place for its intended purpose of disaster recovery, but will attract an additional charge when it is not being used for this reason.
35. The Executive Sub-Committee is asked, therefore, to recommend that the main Committee approve the following non-appeal charges to users for 2018/19:
- The TRACE (Electronic) charge of £7.53 per transaction, compared to £7.31 for the current year;
  - The TRACE (Fax/email) Charge of £7.70 per transaction, which from 1 April 2018 would be levied, in addition to the electronic charge of £7.53 per transaction, making a total of £15.23 (2017/18 - £7.48);
  - The TEC charge of £0.175 per transaction, compared to £0.17 for the current year.

## Parking Enforcement Service Charge

36. The majority of this charge is made up of the fixed cost element of the parking managed service contract provided by Northgate and the provision of accommodation and administrative support to the appeals hearing centre. The calculation for 2018/19 reflects a clarification of the level of Business Rates payable at the hearing centre at Chancery Exchange following the recent review of rateable values. The total fixed cost is allocated to users in accordance with the number of PCNs issued, which for 2018/19 will be those issued by enforcing authorities during 2016/17, which is detailed in Appendix D. For 2018/19, expenditure of £2.663 million needs to be recouped, compared to £2.769 million for 2017/18, which is detailed in Table 5 below:

**Table 5 – Breakdown of Parking Enforcement Charge 2017/18**

	<b>2018/19 (£000)</b>	<b>2017/18 (£000)</b>
Fixed Contract Costs	1,112	1,079
Hearing Centre Premises Costs	624	644
Direct Staffing Costs	485	500
General Office Expenditure	46	191
Central Recharges	396	355
<b>Total</b>	<b>2,663</b>	<b>2,769</b>

37. After top-slicing this amount for the revised fixed contract sum of £497,000 attributable to congestion charging and LEZ contraventions rechargeable to the GLA (refer paragraph 28), a total of £2.166 million remains to be apportioned through the 5.126 million PCNs issued by boroughs and TfL in 2016/17 in respect of parking, bus lane, moving traffic and lorry ban enforcement, compared to 4.713 million issued in 2015/16. The increase in the number of PCNs issued over the two comparative years increases the spreading base, which together with a reduction in total costs of £106,000 leads to a reduction in the proposed unit charge to boroughs and TfL of £0.0689, or 14%, from £0.4915 to £0.4226 per PCN for 2018/19, which members are asked to recommend to the main Committee. In addition, under the terms of the contract with Northgate, there is a separate fixed cost identified in respect of the use of the TRACE and TEC systems. For 2017/18, this sum was £89,000 and is estimated to increase to £92,000 in 2018/19. This sum will be apportioned to boroughs in accordance with volumes of transaction generated on each system.

## Parking Core Administration Charge

38. The core subscription covers a proportion of the cost of the central management and policy work of the Committee and its related staff, accommodation, contract monitoring and other general expenses. It is charged to boroughs and TfL at a uniform rate, which for 2017/18 was £1,500 per borough. As there is limited scope for additional savings or efficiencies to be identified from within the £51,000 this levy raises for the Committee, it is recommended that this charge be held at the current level of £1,500 per borough and TfL for 2018/19.

## Registration of Debt at the Traffic Enforcement Centre (TEC) - Northampton County Court

39. Expenditure in respect of the registration of debt related to parking penalties is directly recouped from the registering borough, so the transactions have a neutral effect on the financial position of the Committee. The Court Service last increased the £7 unit fee to £8 in July 2016, although no further increases are envisaged during 2018/19. Volumes generated by users registered parking debt is expected to exceed £3 million for the current year, so it is, therefore, proposed to maintain both the income and expenditure budgets for 2018/19 at £3 million.
40. Estimated individual borough costs for 2018/19, covering the proposed charges highlighted in paragraphs 15-37 above, are detailed in Appendix C.1 and can be compared against the estimated charges for the current year at Appendix C.2, forecast at the budget setting stage for the current year 12 months ago. Indicative overall estimated marginal saving of £15,000 in 2018/19 to boroughs and TfL arising from the proposed charges, together with the projected transaction volumes, are projected, assuming that the detailed proposed charges for 2018/19 are approved in full by the main Committee in December.

## Contractual Commitments

41. **Staffing Costs** -The proposed staffing budget for TEC for 2018/19 is illustrated in Table 6 below:

<b>Table 6– TEC Indicative Staffing Budget 2018/19</b>	<b>£000</b>
<b>2017/18 Revised Budget</b>	<b>2,058</b>
1½% pay award 2018/19	30
Incremental salary drift/other adjustments	(36)
<b>2018/19 Base Budget</b>	<b>2,052</b>
Split between:	
Services – Parking and Traffic	97
Services – ETA	330
Services - RUCA	155
Services – Transport and Mobility	752
PAPA - Policy	366
PAPA - Communications	234
Chief Executive – Committee Servicing	49
Chief Executive – DP/FOI work	69
<b>2017/18 Base Budget</b>	<b>2,052</b>

42. In line with other London Councils funding streams, the vacancy level for 2018/19 remains at 2%. The salary figures include an estimated 1½% cost of living increase on all salary costs and a reduction to cover incremental salary drift of £24,000 plus a reduction in bespoke FOI related work directly recharged to the Committee of £12,000. In addition to the salaries figure of £2.052 million shown in Table 6, the £18,987 budgetary provision for member's allowances has been maintained at the 2017/18 level, as has the provision for maternity cover of £30,000.
43. **Accommodation Costs – Chancery Exchange** – The appeals hearing centre at Chancery Exchange, EC4 has been operational since July 2015. The budget for

2018/19 of £496,893 includes the full year cost of the leasehold agreement plus other premises running costs. In addition, a budget for depreciation in respect of the refurbishment costs of Chancery Exchange of £103,166 is required, along with the continuation of a provision for potential redecoration, dilapidation and reinstatement costs payable at the end of the Chancery Exchange lease of £24,191 per annum. These premises costs are fully recovered as part of the Parking Enforcement service charge (refer paragraphs 34-35).

44. **Accommodation Costs - Southwark Street** – These are included as part of central recharges cost and covers the 16.5 desks at Southwark Street that are used by staff who are directly chargeable to the TEC funding stream. Use of this accommodation will attract a desk space charge of £198,038 for 2018/19. In addition, ancillary premises costs such as cleaning, security and maintenance contracts, plus accumulated depreciation, again apportioned on a per capita basis, come to £80,832. The recharges in respect of the Southwark Street accommodation forms part of the administration charge for the direct services– for the freedom pass, taxicard, health emergency badge and the London lorry control scheme, as detailed in paragraphs 6-20 of this report.

### Discretionary Expenditure

45. **Research Budget** – It is recommended that the budget for 2018/19 is maintained at the current year's level of £40,000.
46. **General/Office Costs** - The budgetary provision of £506,000 for 2018/19 is broken down in Table 7 below:

<b>Table 7 – TEC General/Office costs budget 2018/19</b>	<b>£000</b>
<b>2017/18 Revised Budget</b>	<b>585</b>
Reduction in direct general/office costs	(94)
General/office costs inflation	15
<b>2018/19 Base Budget</b>	<b>506</b>
Split between:	
System Developments	100
General/Office costs – postage, telephones, copiers, etc.	198
Appeals related legal costs	26
Staff Training/Recruitment Advertising	29
Staff Travel	4
External audit fees*	22
City of London finance, legal, HR and IT SLA*	127
<b>2018/19 Base Budget</b>	<b>506</b>

\*forms part of central recharge costs

47. The reduction of £79,000 primarily relates to a reduction in the level of direct general/office costs incurred; the majority of these services are now fully provided for centrally and recharged through central recharges.
48. Inflation of 3% has been allowed for 2018/19 on general running costs, except where there are contractual commitments. This factor has been applied to all London Councils budgets.

## Central Recharges

49. Southwark Street accommodation costs (paragraph 42), the Parking Enforcement Charge (paragraph 34) and general office costs (paragraph 44) all contain significant element of central recharge costs, which are apportioned to all London Councils functions in accordance with a financial model that is subject to annual scrutiny by the external auditors. The premises costs of the hearing centre are split between the ETA and RUCA functions, as detailed in paragraphs 34-35. Of the total central costs apportioned to TEC in 2018/19 (excluding LEPT) of £964,000, a sum of £849,000 feeds into the recharges for the direct services administration charges based at Southwark Street and for the ETA and RUCA services at the appeals hearing centre. The residual £115,000 relates the TEC policy and administrative function based at Southwark Street. In addition, as detailed in paragraph 34, a further sum of £624,000 relates the premises costs at Chancery Exchange.
50. As detailed in paragraph 51 below, it is proposed that this Committee recommend that the main Committee approved the transfer of a sum of £289,000 from uncommitted general reserves to smooth the effect of the underlying increase to direct service costs.

## Other Income

- 51. Miscellaneous Income** – It is estimated that income of £75,000 will continue to accrue from two main sources in 2017/18. Firstly, £44,000 is expected to accrue for the administration of the Health Emergency badge (HEB) in the form of registration fees and charges for badges to medical professionals. This will enable this service to be provided at no cost to boroughs. Secondly, £31,000 is expected to accrue from TfL for secretarial services provided by the Committee during the Freedom Pass negotiations.

## Committee Reserves

52. Table 8 below updates the Committee on the revised projected level of reserves as at 1 April 2018, if all current known liabilities and commitments are considered and the draft proposals outlined in this report are agreed in December:

**Table 8– Analysis of Estimated Uncommitted Reserves as at 1 April 2018**

	<b>General Reserve</b>	<b>Specific Reserve</b>	<b>Total</b>
	<b>£000</b>	<b>£000</b>	<b>£000</b>
<b>Audited reserves at 31 March 2017</b>	<b>3,341</b>	<b>1,734</b>	<b>5,075</b>
Amount carried forward from 2016/17	(227)	-	(227)
Repayment to boroughs and TfL in 2017/18	(340)	-	(340)
Proposed use in setting 2017/18 budget	(288)	-	(288)
Transfer between reserves	(1,000)	1,000	-
Projected Budget Surplus 2018/19	698	303	1,001
<b>Projected uncommitted reserves as at 31 March 2018</b>	<b>2,184</b>	<b>3,037</b>	<b>5,221</b>
Proposed use in setting 2018/19 budget	(289)	-	(289)
<b>Estimated uncommitted reserves as at 1 April 2018</b>	<b>1,895</b>	<b>3,037</b>	<b>4,932</b>

53. The projected level of uncommitted general reserves as at 1 April 2018 assumes that the draft proposals as laid out in this report is agreed are by this Committee and approved by the main TEC meeting in December. It is proposed that a sum of £239,000 be transferred from general reserves to continue to smooth the effect of the underlying increase in direct service charges and also a continuing sum of £50,000 to enhance the IT systems development budget for 2018/19 only as a contingency for any further expenditure on developing the parking managed services IT system at Chancery Exchange.
54. In addition, the overall reserves position also reflects the projected amount expected to be held in the specific reserve as at 1 April 2018 of £3.037 million (£2.837 million to meet the cost of the next bulk freedom pass renewal exercise in 2020 and £200,000 for other TEC project work). For comparative purposes, the final cost of the 2015 bulk freedom pass renewal exercise was £2.61 million.
55. After taking into account the forecast surplus of £1.001 million for the current year, which is subject to a separate report on this agenda, uncommitted general reserves are forecast to be £1.895 million as at 1 April 2018. This equates to 16.2% of proposed operating and trading expenditure of £11.705 million for 2018/19. This figure, therefore, marginally exceeds the Committee's formal policy on reserves, agreed in December 2015 that reserves should equate to between 10-15% of annual operating and trading expenditure.

## **Summary**

56. This report details the outline revenue budget proposals and the proposed indicative borough subscription and charges for 2018/19. The Executive Sub-Committee is asked to comment on these outline proposals in order that any comments can be consolidated in the further report for the full TEC meeting in December, where the detailed budget proposals and levels of subscriptions and charges for 2018/19 will be presented for final approval. The proposed level of expenditure for 2018/19 amounts to £368.775 million. A sum of £357.07 million relates to direct expenditure on the transport operators providing the Freedom Pass and the Taxicard schemes, leaving £11.705 million relating to expenditure on parking and traffic related traded service and other operating expenditure. This compares to a comparable sum of £12.282 million for the current year, a reduction of £577,000, or 4.7%.

## **Recommendations**

57. The Executive-Sub Committee recommends that the main Committee approve at their meeting on 7 December:
- The proposed individual levies and charges for 2018/19 as follows:
    - The Parking Core Administration Charge of £1,500 per borough and for TfL (2017/18 - £1,500; paragraph 38);
    - The total Parking Enforcement Service Charge of £0.4226 which will be distributed to boroughs and TfL in accordance with PCNs issued in 2016/17 (2017/18 - £0.4915 per PCN; paragraphs 36-37);
    - No charge to boroughs in respect of the Freedom Pass Administration Charge, which is covered by replacement Freedom Pass income (2017/18 – nil charge; paragraph 15);

- The Taxicard Administration Charge to boroughs of £338,182 in total (2017/18 - £338,182; paragraphs 17).
- No charge to boroughs in respect of the Lorry Control Administration Charge, which is fully covered by estimated PCN income (2017/18 – nil charge; paragraphs 19-20);
- Road User Charging Appeals (RUCA) – to be recovered on a full cost recovery basis under the new contract arrangements with the GLA (paragraph 28);
- In addition, after considering the specific proposals outlined at paragraph 4, the Executive-Sub Committee is also asked to recommend that the main Committee approve at their meeting on 7 December:
  - A unit charge of £12 for the replacement of a lost or damaged Freedom Pass (2017/18 - £10; paragraph 10);
  - Environment and Traffic Appeals (ETA) charge of £30.63 per appeal or £27.02 per appeal where electronic evidence is provided by the enforcing authority (2017/18 - £32.00/£28.50 per appeal). For hearing Statutory Declarations, a charge of £25.21 for hard copy submissions and £23.53 for electronic submissions (2017/18 - £26.74/£26.06 per SD) (paragraph 27);
  - The TRACE (Electronic) Charge of £7.53 per transaction (2017/18 - £7.31; paragraphs 29-35);
  - The TRACE (Fax/Email) Charge of £7.70 per transaction, which from 1 April 2018 would be levied, in addition to the electronic charge of £7.53 per transaction, making a total of £15.23 (2017/18 - £7.48; paragraphs 29-35);
  - The TEC<sup>4</sup> Charge of £0.175 per transaction (2017/18 - £0.17; paragraphs 29-35).
- The provisional gross revenue expenditure of £368.775 million for 2018/19, as detailed in Appendix A; and
- On the basis of the agreement of the above proposed charges, (including those at paragraph 4), the provisional gross revenue income budget of £368.486 million for 2018/19, with a recommended transfer of £289,000 from uncommitted Committee reserves to produce a balanced budget, as shown in Appendix B.

58. The Executive-Sub Committee is also asked to note:

- the current position on reserves, as set out in paragraphs 52-55 and Table 9 of this report; and
- the estimated total charges to individual boroughs for 2018/19, as set out in Appendix C.1.

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<sup>4</sup> The system that allows boroughs to register any unpaid parking tickets with the Traffic Enforcement Centre and apply for bailiff's warrants.



**Financial Implications for London Councils**

None, other than those detailed in the report

**Legal Implications for London Councils**

None

**Equalities Implications for London Councils**

None

**Appendices**

Appendix A – Proposed revenue expenditure budget 2018/19;

Appendix B – Proposed revenue income budget 2018/19;

Appendix C.1 – Indicative charges to boroughs 2018/19;

Appendix C.2 – Indicative charges to boroughs 2018/19; and

Appendix D – Parking Enforcement statistics 2016/17.

**Background Papers**

TEC Budget Working Papers 2017/18 and 2017/18;

TEC Final Accounts Working Papers 2016/17;

TEC Revenue Budget Forecast Working Papers 2017/18; and

London Councils Consolidated Budget Working Papers 2017/18 and 2018/19.

## TEC Expenditure Base Budget 2018/19

## Appendix A

	Revised 2017/18 £000	Develop- ments £000	Base 2018/19 £000	Inflation £000	Original 2018/19 £000
<b>Payments in respect of Concessionary Fares</b>					
TfL	324,181	-865	323,316	0	323,316
ATOC	18,872	0	18,872	681	19,553
Other Bus Operators	1,700	-200	1,500	0	1,500
Freedom Pass issue costs	1,518	0	1,518	0	1,518
Freedom Pass Administration	484	-5	479	0	479
City Fleet Taxicard contract	12,499	0	12,499	202	12,701
Taxicard Administration	527	10	537	0	537
	359,781	-1,060	358,721	883	359,604
<b>TEC Trading Account Expenditure</b>					
Payments to Adjudicators- ETA	920	-115	805	21	826
Payments to Adjudicators - RUCA	253	26	279	7	286
Northgate variable contract costs - ETA	275	14	289	9	298
Northgate variable contract costs - RUCA	60	6	66	1	67
Northgate variable contract costs - Other	183	0	183	6	189
Payments to Northampton County Court	3,000	0	3,000	0	3,000
Lorry Control Administration	709	-2	707	0	707
ETA/RUCA Administration	2,769	-105	2,664	0	2,664
HEB Administration	43	2	45	0	45
	8,212	-174	8,038	44	8,082
<b>Sub-Total</b>	<b>367,993</b>	<b>-1,234</b>	<b>366,759</b>	<b>927</b>	<b>367,686</b>
<b>Operating Expenditure</b>					
<b>Contractual Commitments</b>					
NG Fixed Costs	89	1	90	2	92
	89	1	90	2	92
<b>Salary Commitments</b>					
Non-operational staffing costs	626	4	630	9	639
Members	19	0	19	0	19
Maternity/Paternity Provision	30	0	30	0	30
	675	4	679	9	688
<b>Discretionary Expenditure</b>					
Supplies and services	297	-139	158	0	158
Research	40	0	40	0	40
One off payment to boroughs	340	-340	0	0	0
	677	-479	198	0	198
<b>Total Operating Expenditure</b>	<b>1,441</b>	<b>-474</b>	<b>967</b>	<b>11</b>	<b>978</b>
<b>Central Recharges</b>	<b>90</b>	<b>21</b>	<b>111</b>	<b>0</b>	<b>111</b>
<b>Total Expenditure</b>	<b>369,524</b>	<b>-1,687</b>	<b>367,837</b>	<b>938</b>	<b>368,775</b>

	Original 2017/18 £000	Develop- ments £000	Revised 2017/18 £000	Inflation £000	Base 2018/19 £000
Borough contributions to TfL	324,181	-865	323,316	0	323,316
Borough contributions to ATOC	18,872	0	18,872	681	19,553
Borough contributions to other bus operators	1,700	-200	1,500	0	1,500
Borough contributions to surveys/reissue costs	1,518	0	1,518	0	1,518
Borough contributions to freedom pass administration	0	0	0	0	0
Income from replacing lost/faulty freedom passes	600	-36	564	120	684
Income from replacing lost/faulty taxicards	24	-3	21	0	21
Borough contributions to Taxicard scheme	2,409	0	2,409	0	2,409
TfL contribution to Taxicard scheme	10,090	0	10,090	202	10,292
Borough contributions to taxicard administration	326	-2	324	0	324
TfL Contribution to taxicard administration	118	6	124	0	124
	359,838	-1,100	358,738	1,003	359,741
<b>TEC trading account income</b>					
Borough contributions to Lorry ban administration	0	0	0	0	0
Lorry ban PCNs	800	0	800	0	800
Borough ETA appeal charges	957	13	970	-40	930
TfL ETA appeal charges	238	7	245	-10	235
RUCA appeals income	313	36	349	4	353
Borough fixed parking costs	2,190	-145	2,045	0	2,045
TfL fixed parking costs	214	0	214	0	214
RUCA fixed parking costs	454	43	497	0	497
Borough other parking services	484	1	485	15	500
Northampton County Court Recharges	3,000	0	3,000	0	3,000
	8,650	-45	8,605	-32	8,573
<b>Sub-Total</b>	<b>368,488</b>	<b>-1,145</b>	<b>367,343</b>	<b>971</b>	<b>368,314</b>
<b>Core borough subscriptions</b>					
Joint Committee	46	0	46	0	46
TEC (inc TfL)	51	0	51	0	51
	97	0	97	0	97
<b>Other Income</b>					
TfL secretariat recharge	41	-10	31	0	31
Sales of Health Emergency badges	43	1	44	0	44
Miscellaneous income	0	0	0	0	0
	84	-9	75	0	75
<b>Transfer from Reserves</b>	<b>855</b>	<b>-566</b>	<b>289</b>	<b>0</b>	<b>289</b>
<b>Central Recharges</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Total Income Base Budget</b>	<b>369,524</b>	<b>-1,720</b>	<b>367,804</b>	<b>971</b>	<b>368,775</b>

# Indicative Charges to Boroughs 2018/2019

# Appendix C.1

BOROUGH	Core Parking (£)	Fixed Parking (£)	Con.Fares Admin. (£)	Taxicard Admin. (£)	Lorry Ban Admin. (£)	Parking Appeals (£)	TRACE Electronic (£)	TRACE FAX (£)	TEC (£)	Total Estimate 2018/19 (£)	Total Estimate 2017/18 (£)	Estimated Movement (£)
Barking & Dagenham	1,500	45,467	0	6,989	0	29,100	0	55	0	83,111	85,210	-2,099
Barnet	1,500	89,281	0	14,159	0	75,993	0	0	8,777	189,711	195,214	-5,503
Bexley	1,500	27,067	0	4,953	0	12,118	0	0	0	45,638	46,554	-916
Brent	1,500	79,533	0	13,953	0	53,588	1,061	15,155	0	164,790	157,729	7,061
Bromley	1,500	37,690	0	5,918	0	11,699	0	109	0	56,916	62,461	-5,545
Camden	1,500	104,630	0	11,746	0	48,162	19,203	1,056	13,907	200,204	213,498	-13,294
Croydon	1,500	49,019	0	12,002	0	25,085	1,656	0	10,844	100,107	111,088	-10,981
Ealing	1,500	68,022	0	13,863	0	34,449	0	237	9,284	127,355	128,735	-1,380
Enfield	1,500	47,538	0	5,556	0	12,701	7,890	565	4,560	80,310	80,395	-85
Greenwich	1,500	16,433	0	11,449	0	11,771	0	0	3,007	44,160	46,486	-2,326
Hackney	1,500	42,552	0	14,783	0	34,540	13,918	255	3,000	110,549	119,485	-8,936
Hammersmith & Fulham	1,500	100,523	0	9,443	0	31,668	23,036	146	9,512	175,828	186,604	-10,776
Haringey	1,500	79,811	0	11,399	0	17,894	18,868	1,840	15,933	147,244	150,819	-3,575
Harrow	1,500	69,964	0	11,902	0	28,959	0	0	1,907	114,231	144,647	-30,416
Havering	1,500	30,090	0	13,908	0	31,893	0	0	0	77,392	55,238	22,154
Hillingdon	1,500	36,270	0	5,380	0	11,556	0	0	4,310	59,015	50,391	8,625
Hounslow	1,500	51,220	0	10,021	0	20,555	651	7,978	4,905	96,830	95,755	1,075
Islington	1,500	99,715	0	13,958	0	17,653	9,080	1,038	12,875	155,820	148,186	7,633
Kensington & Chelsea	1,500	86,558	0	9,840	0	24,180	39,448	1,548	10,910	173,983	172,160	1,823
Kingston	1,500	74,155	0	9,272	0	29,506	0	91	3,729	118,253	104,073	14,180
Lambeth	1,500	78,368	0	10,288	0	52,780	707	7,905	14,994	166,542	160,114	6,428
Lewisham	1,500	29,780	0	8,794	0	16,181	0	0	5,272	61,528	48,708	12,820
Merton	1,500	60,964	0	10,429	0	27,706	0	18	0	100,617	100,930	-313
Newham	1,500	65,850	0	13,380	0	46,822	56,455	1,311	13,350	198,668	212,665	-13,997
Redbridge	1,500	55,539	0	15,331	0	57,801	0	0	3,100	133,271	122,650	10,621
Richmond	1,500	33,594	0	10,172	0	12,073	0	565	1,544	59,447	58,656	792
Southwark	1,500	48,427	0	15,301	0	16,916	3,256	7,377	5,998	98,775	108,692	-9,918
Sutton	1,500	10,931	0	7,281	0	3,255	0	0	1,693	24,660	23,231	1,429
Tower Hamlets	1,500	49,438	0	8,598	0	37,916	21,287	73	0	118,812	107,939	10,873
Waltham Forest	1,500	62,151	0	8,050	0	29,350	28,413	710	0	130,175	150,596	-20,421
Wandsworth	1,500	58,779	0	9,699	0	12,367	10,550	583	3,052	96,531	100,587	-4,056
City of Westminster	1,500	136,269	0	9,720	0	43,026	1,023	6,940	20,439	218,917	192,310	26,607
City of London	1,500	26,986	0	578	0	7,982	0	0	0	37,046	37,445	-399
	<b>49,500</b>	<b>1,952,615</b>	<b>0</b>	<b>338,118</b>	<b>0</b>	<b>927,244</b>	<b>256,502</b>	<b>55,556</b>	<b>186,902</b>	<b>3,766,436</b>	<b>3,779,251</b>	<b>-12,815</b>
Transport for London - Street Management	1,500	213,753	0	0	0	235,290	0	0	0	450,543	453,075	-2,532
Transport for London - Congestion Charging	0	497,372	0	0	0	353,033	0	0	0	850,405	766,729	83,676
Lorry Control	0	2,550	0	0	0	2,588	0	0	0	5,138	4,863	275
TEC/TRACE fixed costs	0	0	0	0	0	0	0	0	0	92,000	89,000	3,000
Registration of Debt	0	0	0	0	0	0	0	0	0	3,000,000	3,000,000	0
Transfer from Reserves	0	0	0	0	0	0	0	0	0	0	0	0
<b>Grand Total</b>	<b>51,000</b>	<b>2,666,290</b>	<b>0</b>	<b>338,118</b>	<b>0</b>	<b>1,518,155</b>	<b>256,502</b>	<b>55,556</b>	<b>186,902</b>	<b>8,164,522</b>	<b>8,092,918</b>	<b>71,604</b>

## Indicative Charges to Boroughs 2017/2018

## Appendix C.2

BOROUGH	Core Parking (£)	Fixed Parking (£)	Con.Fares Admin. (£)	Taxicard Admin. (£)	Lorry Ban Admin. (£)	Parking Appeals (£)	TRACE Electronic (£)	TRACE FAX (£)	TEC (£)	Total Estimate 2017/18 (£)
Barking & Dagenham	1,500	45,467	0	7,703	0	30,540	0	0	0	85,210
Barnet	1,500	89,281	0	13,975	0	85,222	0	0	5,236	195,214
Bexley	1,500	27,067	0	5,046	0	12,941	0	0	0	46,554
Brent	1,500	79,533	0	13,797	0	43,448	0	19,451	0	157,729
Bromley	1,500	37,690	0	5,806	0	17,446	0	19	0	62,461
Camden	1,500	104,630	0	13,011	0	67,237	13,384	6,341	7,394	213,498
Croydon	1,500	49,019	0	12,146	0	42,288	488	0	5,646	111,088
Ealing	1,500	68,022	0	13,362	0	38,066	17	524	7,244	128,735
Enfield	1,500	47,538	0	4,768	0	10,666	6,326	3,665	5,931	80,395
Greenwich	1,500	16,433	0	11,764	0	13,790	0	582	2,418	46,486
Hackney	1,500	42,552	0	14,284	0	31,888	24,120	931	4,210	119,485
Hammersmith & Fulham	1,500	100,523	0	9,448	0	44,709	23,580	1,377	5,467	186,604
Haringey	1,500	79,811	0	10,952	0	25,468	17,602	4,577	10,910	150,819
Harrow	1,500	69,964	0	14,138	0	52,375	0	0	6,670	144,647
Havering	1,500	30,090	0	13,902	0	9,745	0	0	0	55,238
Hillingdon	1,500	36,270	0	4,611	0	5,822	0	0	2,188	50,391
Hounslow	1,500	51,220	0	9,600	0	19,390	0	9,677	4,368	95,755
Islington	1,500	99,715	0	13,121	0	15,185	8,313	97	10,255	148,186
Kensington & Chelsea	1,500	86,558	0	10,202	0	27,825	36,040	3,161	6,874	172,160
Kingston	1,500	74,155	0	9,647	0	14,412	0	19	4,339	104,073
Lambeth	1,500	78,368	0	10,391	0	36,103	17	7,039	26,695	160,114
Lewisham	1,500	29,780	0	8,992	0	7,182	0	0	1,255	48,708
Merton	1,500	60,964	0	10,333	0	28,113	0	19	0	100,930
Newham	1,500	65,850	0	13,304	0	63,885	58,627	795	8,704	212,665
Redbridge	1,500	55,539	0	15,013	0	43,288	0	0	7,310	122,650
Richmond	1,500	33,594	0	9,820	0	11,789	0	465	1,487	58,656
Southwark	1,500	48,427	0	15,070	0	21,482	174	14,932	7,107	108,692
Sutton	1,500	10,931	0	7,037	0	2,949	0	0	813	23,231
Tower Hamlets	1,500	49,438	0	8,829	0	25,074	23,039	58	0	107,939
Waltham Forest	1,500	62,151	0	8,106	0	52,363	24,381	2,094	0	150,596
Wandsworth	1,500	58,779	0	9,872	0	16,569	8,871	175	4,822	100,587
City of Westminster	1,500	136,269	0	9,883	0	29,415	2,126	2,948	10,169	192,310
City of London	1,500	26,986	0	629	0	7,884	0	446	0	37,445
	<b>49,500</b>	<b>1,952,615</b>	<b>0</b>	<b>338,562</b>	<b>0</b>	<b>954,562</b>	<b>247,107</b>	<b>79,393</b>	<b>157,512</b>	<b>3,779,251</b>
Transport for London - Street Management	1,500	213,753	0	0	0	237,822	0	0	0	453,075
Transport for London - Congestion Charging	0	453,611	0	0	0	313,118	0	0	0	766,729
Lorry Control	0	2,550	0	0	0	2,313	0	0	0	4,863
TEC/TRACE fixed costs	0	0	0	0	0	0	0	0	0	89,000
Registration of Debt	0	0	0	0	0	0	0	0	0	3,000,000
Transfer from Reserves	0	0	0	0	0	0	0	0	0	0
<b>Grand Total</b>	<b>51,000</b>	<b>2,622,529</b>	<b>0</b>	<b>338,562</b>	<b>0</b>	<b>1,507,816</b>	<b>247,107</b>	<b>79,393</b>	<b>157,512</b>	<b>8,092,918</b>

**Parking Enforcement Fixed Costs 2018/19**  
(based on PCNs issued for 2016/17)

**Appendix D**

Enforcing Authority	Total PCNs	Parking Fixed Costs
		0.4226
Barking & Dagenham	107,589	45,467.11
Barnet	211,267	89,281.43
Bexley	64,048	27,066.68
Brent	188,199	79,532.90
Bromley	89,185	37,689.58
Camden	247,586	104,629.84
City of London	63,858	26,986.39
Croydon	115,995	49,019.49
Ealing	160,961	68,022.12
Enfield	112,490	47,538.27
Greenwich	38,885	16,432.80
Hackney	100,692	42,552.44
Hammersmith & Fulham	237,869	100,523.44
Haringey	188,856	79,810.55
Harrow	165,555	69,963.54
Havering	71,203	30,090.39
Hillingdon	85,825	36,269.65
Hounslow	121,202	51,219.97
Islington	235,957	99,715.43
Kensington & Chelsea	204,822	86,557.78
Kingston	175,473	74,154.89
Lambeth	185,443	78,368.21
Lewisham	70,469	29,780.20
Merton	144,260	60,964.28
Newham	155,821	65,849.95
Redbridge	131,422	55,538.94
Richmond	79,494	33,594.16
Southwark	114,592	48,426.58
Sutton	25,866	10,930.97
Tower Hamlets	116,985	49,437.86
Waltham Forest	147,068	62,150.94
Wandsworth	139,090	58,779.43
Westminster	322,454	136,269.06
Transport for London Street Management	505,804	213,752.77
London Councils London Lorry Control Scheme	6,034	2,549.97
<b>Total</b>	<b>5,132,319</b>	<b>2,168,918</b>

## London Councils' Transport and Environment Committee – 12 October 2017

Minutes of a meeting of London Councils' Transport and Environment Committee held on Thursday 12 October 2017 at 2:30pm in the Conference Suite, London Councils, 59½ Southwark Street, London SE1 0AL

### Present:

Council	Councillor
Barking and Dagenham	Cllr Lynda Rice
Barnet	<b>Apologies</b>
Bexley	Cllr Colin Tandy (Deputy)
Brent	
Bromley	Cllr Tim Stevens (Deputy)
Camden	
Croydon	Cllr Stuart King
Ealing	Cllr Julian Bell (Chair)
Enfield	Cllr Vicki Pite (Deputy)
Greenwich	Cllr Sizwe James
Hackney	Cllr Feryal Demirci
Hammersmith and Fulham	Cllr Larry Culhane (Deputy)
Haringey	
Harrow	Cllr Graham Henson
Havering	Cllr Jason Frost
Hillingdon	Cllr Douglas Mills (Deputy)
Hounslow	<b>Apologies</b>
Islington	Cllr Claudia Webbe
Kensington and Chelsea	Cllr Will Pascall
Kingston Upon Thames	Cllr Phil Doyle
Lambeth	Cllr Jennifer Brathwaite
Lewisham	
Merton	Cllr Nick Draper (Deputy)
Newham	Cllr Pat Murphy
Redbridge	Cllr John Howard
Richmond Upon Thames	Cllr Peter Buckwell
Southwark	
Sutton	Cllr Jill Whitehead
Tower Hamlets	
Waltham Forest	Cllr Clyde Loakes
Wandsworth	Cllr Caroline Usher
City of Westminster	
City of London	
Transport for London	Alex Williams

## **1. Apologies for Absence & Announcement of Deputies**

### Apologies:

Cllr Dean Cohen (LB Barnet)  
Cllr Alex Sawyer (LB Bexley)  
Cllr Colin Smith (LB Bromley)  
Cllr Daniel Anderson (LB Enfield)  
Cllr Wesley Harcourt (LB Hammersmith & Fulham)  
Cllr Keith Burrows (LB Hillingdon)  
Cllr Amrit Mann (LB Hounslow)  
Cllr Martin Whelton (LB Merton)

### Deputies:

Cllr Colin Tandy (LB Bexley)  
Cllr Tim Stevens (LB Bromley)  
Cllr Vicki Pite (LB Enfield)  
Cllr Larry Culhane (LB Hammersmith & Fulham)  
Cllr Douglas Mills (LB Hillingdon)  
Cllr Nick Draper (LB Merton)

## **2. Declaration of Interests**

### Freedom Pass Holders/60+ Oyster Cards

Cllr Phil Doyle (RB Kingston), Cllr Pat Murphy (LB Newham), Cllr Peter Buckwell (LB Richmond), Cllr Jill Whitehead (LB Sutton), Cllr Caroline Usher (LB Wandsworth), Cllr Colin Tandy (LB Bexley), Cllr Vicki Pite (LB Enfield), and Cllr Nick Draper (LB Merton).

### North London Waste Authority

Cllr Daniel Anderson (LB Enfield), Cllr Claudia Webbe (LB Islington), and Cllr Clyde Loakes (LB Waltham Forest).

### East London Waste Authority

Cllr Lynda Rice (LB Barking & Dagenham), Cllr Pat Murphy (LB Newham) and Cllr John Howard (LB Redbridge)

### West London Waste Authority

Cllr Peter Buckwell (RB Richmond upon Thames) and Cllr Graham Henson (LB Harrow)

### Western Riverside Waste Authority

Cllr Wesley Harcourt (LB Hammersmith & Fulham) and Cllr Jenny Brathwaite (LB Lambeth)

### South London Waste Partnership

Cllr Stuart King (LB Croydon), Cllr Phil Doyle (RB Kingston), and Cllr Jill Whitehead (LB Sutton).



#### London Waste & Recycling Board

Cllr Feryal Demirci (LB Hackney)

#### Car Club

Cllr Julian Bell (LB Ealing – Chair) and Cllr Feryal Demirci (LB Hackney)

#### Thames Regional Flood & Coastal Committee (Thames RFCC)

Cllr Lynda Rice (LB Barking & Dagenham)

Cllr Jenny Brathwaite (LB Lambeth)

Cllr Nick Draper (LB Merton)

#### London Cycling Campaign

Cllr Julian Bell (LB Ealing - Chair) and Cllr Feryal Demirci (LB Hackney)

#### Wandle Valley Regional Park

Cllr Jill Whitehead (LB Sutton)

### **3. Mayor's Environment Strategy – Introduction by Shirley Rodrigues, Deputy Mayor for Environment and Energy, GLA**

Shirley Rodrigues introduced the Mayor's draft London Environment Strategy and made the following comments:

- The Environment Strategy would cover areas like air quality, climate change and waste, and would be aligned with the Transport Strategy being undertaken by Val Shawcross, Deputy Mayor for Transport, GLA.
- It was an ambitious strategy to 2050 and aims to provide certainty in the long-term.
- The Mayor's aim was to improve the environment now through implementing policies for air quality, green infrastructure, energy efficiencies and fuel poverty.
- A new "T-Charge" (Toxicity Charge) would come in to force on 23 October 2017 and would have wide reaching implications for health. The introduction of the Ultra Low Emission Zone (ULEZ) would improve air quality further.
- Part of plans for increasing green infrastructure was to make London a "National Park City" by 2050. Green belt land would continue to be protected. A "Green Spaces Commission" would be set-up to look at parks and open spaces.
- The Environment Strategy included targets for waste and recycling (65% recycling rate by 2030).
- There would be a new Thames Flood Barrier in the future.
- There were health issues regarding ambient noise, especially with regards to aircraft noise due to aviation expansion. The Environment Strategy contained proposals to have areas of respite to get away from ambient noise.
- The Mayor's draft Environment Strategy consultation would end on 17 November 2017.

#### Q and As

Councillor Brathwaite asked whether the Mayor would have an influence on manufacturers and retail organisations with regards to waste. She felt that TfL needed to be more accountable when it came to its tree funding programme. Councillor Loakes asked whether the Mayor would call for the devolution of landfill tax. Councillor Whitehead said that the South London Waste Partnership already had a recycling rate of 55%. She asked how the Mayor's 65% recycling target would affect this rate. Councillor Whitehead said that the borough of Sutton had a problem with helicopter noise, especially in the summer months.

Shirley Rodrigues said that the Mayor had strong convening powers when it came to influencing manufacturers on waste. The GLA was working with organisations to help reduce waste. The London Waste and Recycling Board (LWARB) would be leading and supporting small businesses on this. Shirley Rodrigues informed members that part of the Healthy Streets approach in the draft Transport Strategy included planting more trees and ensuring environmental integration – TfL would be looking further into this. With regards to the devolution of landfill tax, Shirley Rodrigues said that there was uncertainty over this while the UK was leaving the EU, but this would be flagged-up post Brexit. Shirley Rodrigues said that the waste targets were not borough targets, but Londonwide targets. She confirmed that the Mayor had no powers over helicopter noise.

Councillor Webbe asked if any dovetailing with regards to the Environment Strategy and tackling air pollution from diesel vehicles was being carried out. Shirley Rodrigues said that more work was being undertaken on air pollution from non-transport areas, like indoor air quality and wood burners, along with emissions from river transport. She said that these areas had been cross referenced with other Mayoral strategies. Councillor Webbe felt that the strategies should be made clearer to the public. Shirley Rodrigues said that major policies like the ULEZ and T-Charge were being communicated to the public. She said that details of a scrappage fund for diesel vehicles would also be released soon. Residents should no longer be using coal on open fires as well. Val Shawcross said that the next stage after ULEZ/Euro 6 would be to have zero emissions from exhausts, through the take-up of hydrogen and electric vehicles.

The Chair introduced Councillor Will Pascall, the new TEC member from RB Kensington and Chelsea and Councillor Phil Doyle (RB Kingston), the new Conservative TEC Vice Chair.

Councillor Pascall asked whether the Mayor would be trying to influence consumer decision making, when it came to purchasing new vehicles. Shirley Rodrigues said that a "cleaner vehicle checker" had been introduced, where a person could go to a website and check how clean their vehicle was. She said this information was being made available for consumers through communication including social media.

The Chair said that the process now was for London Councils' officers to continue to develop the response to the Environment Strategy consultation. Katharina Winbeck said that the draft response would be presented to the TEC Executive Sub Committee on 16 November 2016, and submitted on 17 November 2017. She said that all TEC members would be invited to attend the TEC Executive meeting. The Chair thanked Shirley Rodrigues for her presentation to TEC.

#### **4. Response to Mayor's Draft Transport Strategy – Val Shawcross, Deputy Mayor for Transport, GLA, was available to answer questions.**

The Committee received a report that summarised the development process of the London Councils' draft response to the draft Mayor's Transport Strategy and sought member approval for its contents.

Val Shawcross added the following comments:

- London Councils' draft response to the Mayor's Transport Strategy was very substantial and was very welcomed.
- 350 detailed submissions had been received from stakeholders, along with 6000 individual submissions.
- A large number of seminars, workshops and public focus groups had convened and this had helped to develop a stronger transport strategy. There might also be an Annual Conference Programme, something that would continue to be explored with the Chair and officers at London Councils.
- A lot more work would be carried out on freight which included the "Vision Zero" road safety policies.
- A change to modal shift in outer London needed to take place, facilitated by more public transport.
- On the draft LIP 3 Guidance, it was recognised that this needed to be more policy led and TfL and London Councils' officers were starting to work on this jointly.

The Chair said that this agenda item, and agenda item 5 ("Response to the Mayor's Draft LIP Guidance") would be taken together.

#### Q and As

Councillor Tandy said that it was hoped that the extension from Barking Riverside to Abbey Wood would extend to Bexleyheath in due course. Councillor Tandy said that it was very difficult to get to places like Croydon from Bexley, without experiencing a great deal of traffic and pollution. He said that there also used to be an upper station at Brockley and consideration needed to be given to re-establishing this link.

Councillor Whitehead said that it would be very beneficial if the tramlink could be extended to the borough of Sutton. She said that there was poor public transport in Sutton and some areas had no bus services at all. Councillor Whitehead said that a large number of new development sites were being built and therefore the need for better public transport was increasing. She said that the issue of school runs did not appear to be in the document. Councillor Whitehead said that the majority of parents dropped their children off by car, owing to the poor public transport in the borough. Councillor Frost said that he acknowledged the variations in outer London. He said that population growth in the borough of Havering was expected to increase rapidly over the coming years and infrastructure needed to be in place to support this. Reference to this was not in the current MTS.

Val Shawcross said that TfL was moving forward with a river crossing section on the Gospel Oak line. Network Rail was looking at integrating freight and increasing network links for outer London. Val Shawcross said it was hoped that tram extensions would link into the Crossrail 2 project, although there were only a certain amount of resources available. She said funding being made available was reliant on boroughs putting together a planning framework to support the scheme. Val Shawcross said that the "STARS" programme could encourage better access to schools. A review had also taken place which looked at providing better bus services to hospitals in London.

Councillor Stevens said that it would be beneficial if the tram could be extended to Crystal Palace. Councillor Loakes said that the police did not have the resources to enforce speeding and boroughs should have the powers to carry this out. Councillor Rice said that she appreciated what TfL were doing with regards to buses and the school run, although more capacity was needed on these routes. Councillor King said that more journeys were now taking place on trams and the tram networks in Nottingham and Manchester were being extended. He felt that the tram network now needed to be extended in London.

Councillor Webbe said that she had hoped that the MTS would be looking at a 20mph limit for all London roads and for London to be diesel free by 2025. She said that the electrification of the Barking to Gospel Oak line was a good thing and these benefits should be spread across London. Councillor Usher said that she would like to see some of the targets in the MTS brought forward. The Chair voiced concern at the loss of the Local Transport Funding element of £100,000 per borough that was being taken away from LIP funding annually.

Val Shawcross said that it would be useful to visit Bromley to look at how the borough was connected via transport links. She said that the LGA supported local authorities to have increased powers for speed enforcement and more lawfulness was needed on the roads. Val Shawcross said that the issue of road space allocation and looking at the next generation of technology were in the MTS. She said that proposals to extend the tramlink were being looked at more closely. Val Shawcross said southern boroughs were getting more efficiency out of the National Rail network. She confirmed that the DLR was set to be extended and an extension across the river was currently being discussed.

Val Shawcross said that the issue of road safety around schools was being looked into. She said that the GLA also supported a 20mph limit on London roads where appropriate. Val Shawcross informed members that the MTS document was a 25-year vision document. It was hoped to be more ambitious, but resources had to be balanced. Discussions were taking place with regards to autonomous vehicles. With regards to phasing out diesel vehicles, Val Shawcross said that TfL could only do what was realistic. She informed the Committee that the trials that had been carried out on electric double decker buses had not been going very well, but single decker buses were successful.

Val Shawcross confirmed that TfL and the Mayor were keen to drive-up transport investment, but resources were limited and prioritisation was key. She said that TfL no longer received a grant from the Government and decisions needed to be made on what could be delivered with the resources available.

The Chair said that he would like both references to emission standards in the draft MTS response to highlight that London should be aiming for the more stringent World Health Organisation ones.

Councillor Webbe said that the need for more opportunities for groups of boroughs to work on issues with a lot of commonality had been discussed at the TEC Labour Group meeting. The Chair said that the submission mentioned the role of sub-regional partnerships. Val Shawcross said that south west London was a good example of this. She said that TfL now had a Stakeholder Manager for each of the boroughs, and London Councils was welcome to approach them with regards to sub-regional meetings. The Chair thanked Val Shawcross for her discussion at TEC on the MTS.

**Decision:** The Committee:

- Noted and discussed the report and draft response to the draft Mayor's Transport Strategy; and
- Agreed that further re-drafting of the draft response, as outlined at Appendix 1, including the comments made at the meeting, would take place, and the Chair and vice chairs would sign this off for submission.

**5. Local Implementation Plan Guidance Response – Val Shawcross available to answer any questions.**

The Committee received a report that summarised the development process of London Councils' draft Local Implementation Plan (LIP) Guidance and sought member approval for its contents.

This item had already been discussed in conjunction with agenda item 4.

**Decision:** The Committee:

- Noted and discussed the report and draft response to the draft LIP Guidance at Appendix 1; and
- Agreed to submit the draft response to the draft LIP Guidance as outlined at Appendix 1.

**6. Flooding Investment in London and Introduction of the new Chair of the Thames Regional Flood & Coastal Committee**

The Committee considered a report that provided members with the annual update from the Thames Regional Flood and Coastal Committee (Thames RFCC) on its work and progress on the six-year capital programme to improve flood defence. The report included a business case presented by the Environment Agency on behalf of the Thames RFCC for an increase in local levy.

Robert Van de Noort, the new Chair of the Thames Regional Flood and Coastal Committee (Thames RFCC), introduced the report and the following comments were made:

- Robert Van de Noort was new to the role and had been Chair of the Thames RFCC for only three weeks. He works at the University of Reading. He had previously chaired the South West RFCC for four years.
- One million people were currently at risk from flooding in London.
- A 25-year approach to flooding had been agreed this year by the Thames RFCC.
- The Thames RFCC was working on a number of "themes", including:
  - (1) Slowing the flow – keeping water further upstream to help prevent flooding. A grant of £500k had been received for this;
  - (2) Reducing surface flooding and sewage flooding – work was taking place with Thames Water on this;
  - (3) Promoting the value of flood plains;
  - (4) Reducing the tidal flow risk in the Thames Estuary – this was ongoing;
  - (5) Empowering communities to become more resilient to flooding;

- (6) Delivering forward-looking, integrated schemes, including major projects; and
- (7) Promoting maintenance and the need for contingency plans.
- TEC supported, in principle, a levy increase in 2014 of 1.99% per annum for a six-year programme. Members were now being asked to provide a steer to the TEC members who sat on the Thames RFCC recommending a levy increase of 1.99% for 2018/19.
- The national six-year programme would benefit the whole country. There was still much more to do to reduce flood risks.

### Q and As

Councillor Whitehead confirmed that the “Worcester Park Surface Water Flood Alleviation Scheme” was in the borough of Merton and not Sutton (page 35, Appendix B). She said that there was concern over residents concreting over their gardens, which was contributing to flooding. Councillor Tandy said that there was currently a skills shortage within boroughs with regards to flooding experts and this was making the delivery of schemes, within deadlines, very difficult. He felt that more work needed to be undertaken between London Councils and the Thames RFCC to help break through this skills shortage.

Councillor Draper said that the issue of flooding tended to get pushed down the list of priorities due to the fact it happened so rarely. He said that there were a number of borough officers in south west London that had experience in flooding matters and closer relations were needed between them. The Thames RFCC could help in that respect.

Robert Van de Noort said that concreting over drives and gardens accelerated rain water run-off. He said that people needed to be made aware of the effects that concreting over their drives had on flooding. Robert Van de Noort said that it was recognised that there was a skills shortage. He informed members that the Thames RFCC had a group of advisers that were agreeing a programme to help develop more flood engineers. There would also be opportunities to develop scheme using the apprenticeship levy and discussions were already taking place on this.

### **Decision:** The Committee:

- Agreed that the steer to the TEC members who sit on the Thames RFCC would be to increase the levy by 1.99% for 2018/19;
- Noted the new Chair of the Thames RFCC was Robert Van de Noort; and
- Noted that Worcester Park (Surface Water Flood Alleviation Scheme – page 35 of the report) was in the borough of Merton and not Sutton.

## **7. Chair’s Report**

The Committee received a report that updated members on transport and environment policy since the last TEC meeting on 15 June 2017 and provided a forward look until the next TEC meeting on 7 December 2017.

The Chair said that agreement was now being sought from TEC for the Healthy Streets Board to become an official advisory board. He also asked boroughs that had not already done so, to return the delegated authority forms that allowed London Councils’ TEC to have operational management over the Go Ultra Low City Scheme

(GULCS). An email would be sent to those boroughs to remind them to send back the form. Councillor Doyle said that a TfL communications plan regarding Healthy Streets had been discussed. He said that more momentum was needed on this as this helped the boroughs.

**Decision:** The Committee:

- Agreed that the Healthy Streets Board would become an official advisory board to which London Councils' TEC would nominate members annually at its June AGM; and
- Agreed that an email would be circulated to the boroughs that had not yet returned their delegated authority forms for GULCS (ie to give authority for London Councils to potentially undertake the operational management of the Go Ultra Low City Scheme).

## **8. GLC Parks Byelaws – Setting Penalty Levels**

The Committee considered a report that provided members with the results of the GLC Parks Byelaws consultation which was run over the summer on behalf of TEC.

The Chair asked whether the old byelaws would be brought up-to-date. Jennifer Sibley, Principal Policy Officer, London Councils, said that it was a complex process to try and update the byelaws, although the consultation was part of efforts by the London borough of Wandsworth to modernise its Parks Byelaws.

**Decision:** The Committee:

- Noted the consultation outcome;
- Agreed to set a fixed penalty level of £80 for breaches to the GLC Parks Byelaws; and
- Agreed to set the level of reduced payment at £50 if the fixed penalty was paid within 14 days from the date of the notice.

## **9. Proposed Freedom Pass Settlement Adjustment for Rail Network Disruption**

This report was withdrawn.

## **10. Direct Vision Standard for Heavy Goods Vehicles**

The Committee received a report that gave members an update on Transport for London's (TfL) work on using a Direct Vision Standard (DVS) for Heavy Goods Vehicles (HGVs) to deliver the Mayoral commitment to ban or restrict the most unsafe (zero star) HGVs from London by 2020, and ensure that only HGVs suitable for urban environments (three star and above) were used in London from 2024.

Alex Williams said that there had been 19 pedestrian and cyclist fatalities so far this year, and 25 the previous year involving HGVs. He said that two of the main issues that needed looking at were: (a) how to define the standard and (b) how to apply the standard by 2020. A phased delivery would take place and the preferred regulatory option was currently through TEC's London Lorry Control Scheme (LLCS). The

emerging scheme proposals were due out for consultation in November 2017. He urged members to consider the standard in relation to their own fleets and contracts.

Councillor Frost said that the borough of Havering did not operate the LLCS. Spencer Palmer confirmed that although Havering currently opts out of enforcement of the Scheme, it was in the Traffic Order. He said that the borough of Barnet, however, was not in the Traffic Order and changes would have to be made if Barnet was to become part of the LLCS or the DVS if the LLCS Order was used to implement it.

Councillor Usher asked TfL about collision avoidance systems for HGVs. She said that many new cars were now fitted with these systems. Alex Williams said that TfL had looked at such systems for HGVs. They found that they did not always work so well in a busy urban environment, as the sensors around the vehicle would make the alarm go off all the time. Councillor Usher asked how long ago these tests had been carried out. Alex Williams said that the tests were carried out approximately two years ago. Councillor Usher asked if she could be sent details of the TfL tests on this. Councillor Bell mentioned that his own authority had successfully fitted sensors that used missile detection technology to some of their own fleet.

**Decision:** The Committee:

- Noted the progress made in developing the Direct Vision Standard and proposals to ban or restrict the most unsafe HGVs from London's roads;
- Noted and supported TfL's intention to carry out a policy consultation on a HGV Safety Standard Permit scheme proposal in autumn 2017;
- Noted TfL's work with London Councils to explore the existing London Lorry Control Scheme as the implementation mechanism for any permit scheme; and
- Noted that Alex Williams would let Councillor Usher have the information regarding the tests carried out on HGVs and poor visibility.

## **11. Assisted Transport Allowances**

The Committee received a report that informed the Committee of the outcome of a recent Assembly investigation into improving door-to-door transport services in London and the recommendations made by the Assembly in their subsequent report "Door-to-Door Transport in London – Delivering a User-Led Service".

Joyce Mamode, Head of Passenger Services, TfL, introduced the report and made the following comments:

- There was a proposal for London Councils to work with TfL in scoping a pilot for the Assisted Transport Allowances concept.
- The concept of the small pilot would be to replace individual trips with a "virtual" budget.
- The risks and challenges would be looked at, along with the potential benefit to improve the choice of flexibility. The pilot was currently at the early stages of development.
- Members were being asked to endorse the draft and agree to London Councils participating in a joint steering group to develop the pilot.

**Decision:** The Committee:



- Endorsed the outline proposed objectives and scope for a pilot of Assisted Transport Allowances in two London boroughs;
- Proposed that one of the pilots would be an inner London and the other an outer London borough;
- Agreed to the participation of London Councils in a joint steering group with TfL, to develop the detailed scope of the proposed pilot during October and November 2017;
- Noted that TfL would provide the majority of resources required to undertake the analysis and modelling required to scope the pilot with subject matter expertise provided by London Councils' staff, and
- Noted that an update on the proposed pilot, together with a more detailed proposal, would be presented to members at the TEC meeting in December 2017.

## **12. Code of Practice for Parking Enforcement Part 2**

The Committee considered a report that updated members on the Code of Practice for Parking Enforcement in London. The code was being updated in two parts. The revised Part 1 was agreed at TEC in December 2016. This report sought approval of Part 2 of the revised Code of Practice relating to back office functions.

**Decision:** The Committee:

- Noted the contents of the revised Part 2 of the Code of Practice and agree that it should replace of the existing part of the Code relating the back office functions; and
- Recommended the adoption of Part 2 of the Code of Practice by all London authorities that carried out civil parking enforcement of parking regulations.

## **13. TfL Consultation on Penalty Charge Levels**

The Committee received a report that contained details of TfL's consultation on plans to increase Penalty Charge notices (PCNs) on their network and outlined the reasons why London Councils was not undertaking a similar consultation for PCN levels on borough roads at this time.

**Decision:** The Committee noted the contents of the report regarding TfL plans to increase PCN levels on their network.

## **14. Re-appointment of Environment and Traffic Adjudicators**

The Committee considered a report that proposed the re-appointment of nine environment and traffic adjudicators under the terms of the Traffic Management Act 2004.

Councillor Tandy asked how many times the environment and traffic adjudicators could be re-appointed. Caroline Hamilton, Chief Adjudicator, London Tribunals, confirmed that the adjudicators could get re-appointed every five years, up to the age of 70 years old.

**Decision:** The Committee agreed that the following adjudicators be appointed for a period of 5 years from 10 December 2017:

Neeti Haria  
Caroline Hamilton  
John Hamilton  
Mamta Parekh  
Sean Stanton-Dunne  
Carl Teper  
Timothy Thorne.

Michel Aslangul to be appointed until 26<sup>th</sup> July 2020.  
Francis Lloyd to be appointed until 13<sup>th</sup> March 2021.

#### **15. Environment & Traffic Adjudicators' Annual Report 2016/17**

The Committee received a joint Annual Report by the Environment and Traffic Adjudicators for the reporting year 2016/17.

Caroline Hamilton informed members that the report contained various statistics on appeals over the year and drew attention to a number of individual parking cases. The report could be found on the London Tribunals' website.

**Decision:** The Committee received and noted the report.

#### **16. TEC Constitutional Matters**

The Committee received a report that summarised the key changes to constitutional documents agreed by the Leaders' Committee AGM on 11 July 2017. Changes were being recommended for the following documents: (a) London Councils' Standing Orders, (b) London Councils' Scheme of Delegation to Officers, (c) Terms of Reference for Sub-Committees, and (d) Financial Regulations.

**Decision:** The Committee noted the changes to the London Councils' constitutional documents.

#### **17. Minutes of the TEC Executive Sub Committee held on 15 September 2017 (for noting)**

*Item 3: Air Pollution & Smart Mobility, Q and As (page 2, end of para 4)* – agreed to replace “car” pollution with “air” pollution, (re sentence by Councillor Rice).

Subject to the above minor amendment, the minutes of the TEC Executive Sub Committee held on 15 September 2017 were noted.

#### **18. Minutes of the TEC Main Meeting held on 15 June 2017 (for agreeing)**

The Minutes of the TEC Main Meeting held on 15 June were agreed as an accurate record.

**The meeting finished at 16:25pm**

## **LONDON COUNCILS' TRANSPORT AND ENVIRONMENT EXECUTIVE SUB COMMITTEE**

Minutes of a meeting of the London Councils' Transport and Environment Executive Sub Committee held on **15 September 2017** at 10:00am, at London Councils, Meeting Room 4, 1<sup>st</sup> Floor, 59½ Southwark Street, London, SE1 0AL

### **Present:**

Councillor Julian Bell	LB Ealing (Chair)
Councillor Lynda Rice	LB Barking & Dagenham
Councillor Stuart King	LB Croydon
Councillor Feryal Demirci	LB Hackney
Councillor Phil Doyle	RB Kingston-upon-Thames
Councillor Caroline Usher	LB Wandsworth

### **1. Apologies for Absence & Announcement of Deputies**

Apologies for absence had been received from Councillor Daniel Anderson (LB Enfield), Councillor Peter Buckwell (LB Richmond) and Councillor Jill Whitehead (LB Sutton). No deputies were present.

### **2. Declarations of Interest**

There were no additional declarations of interest other than what was on the sheet provided at Item 2 on the agenda.

### **3. Air Pollution & Smart Mobility – Presentation by Laurie Laybourn-Langton, Institute for Public Policy Research (IPPR)**

Laurie Laybourn-Langton, Institute for Public Policy Research (IPPR) introduced the report and made the following comments:

- There were a number of transport related problems in London, including air pollution, road safety, carbon emissions and congestion.
- The current policy approach was to seek to achieve a reduction in the number of vehicles, greater efficiency of the available space and vehicles themselves, as well as phasing out unsustainable fuels (mainly diesel) and increasing public transport accessibility. Accelerating modal shift was also well underway (eg increase cycling, walking etc).
- New transport technologies were also emerging, like journey planner platforms, car clubs and on-demand hire. It is already possible to plan all journeys on an app on your mobile phone including peer-to-peer rentals (cars are unlocked with your phone as opposed to a key).
- There are positive and negative network effects: Positives included lower car ownership and therefore reduced use of private vehicles, car club fleets have generally cleaner vehicles, which leads to a reduction in air pollution/carbon emissions. Negative effects – Big corporations, such as Google could offer incentives to book with Uber and make it so cheap, that it could result in more vehicles on the road. Efforts could be undermined to realise more sustainable travelling behaviours.

- Crossroads makes some key recommendations for the Mayor: Whilst the report is supportive of the key policies and ambitions in the Mayor's Transport Strategy (MTS), it should include measures for how car clubs could help achieve key transport objectives and also needs to respond to new technologies.  
The Mayor should develop a Framework to include an audit of new mobility markets and their potential effects on key transport objectives and TfL should be a central body for assessing the potential for mobility as a service (MaaS) platform market in London and to develop recommendations for its implementation.
- There needed to be rules to prevent monopolies. TfL should assess the potential for a smart charging system (eg to pay monthly for all journeys taken in a month, which can include an integrated road pricing scheme by making journeys taken by car more expensive, for example).  
Laurie concluded that London was now at a crossroads and needed to decide which way it wanted to turn. New mobility development needs to be embraced with a comprehensive policy framework as the cost of inaction was too high.

### Q & As

Councillor Demirci said that although smart mobility was more efficient, this in itself did not tackle the issue of congestion and/or air quality (ie more cars were not being removed from the roads). Laurie Laybourn-Langton said that there was potential to remove more cars off the roads through smart mobility. He said that car sharing was performing very well in cities like Berlin and Munich and was reducing the number of private cars on the roads, resulting in less congestion and better air quality. Councillor Demirci felt that congestion could increase when Uber vehicles were taken into consideration.

Councillor Usher said that paying a monthly fee for all journeys was a good way forward. She said that an extra fee could be charged for people that drove their vehicles in to congested areas, and reward points given for driving in to less congested areas. Laurie Laybourn-Langton said that TfL could use a version of Google maps to depict differential charging on different roads at different times of day. This technology does exist.

Councillor Doyle said that approximately 10,000 people died as a consequence of air pollution and improvements on this were needed through changes in transport policy in particular. Laurie Laybourn-Langton agreed and mentioned that there were positives to be found with car clubs and warnings to be had with the likes of Uber, especially with regards to the potentially large increase in car usage and congestion. There was also a very large increase in the number of parcels now being delivered by road (eg Amazon), which is a public attitude that requires changing.

Laurie Laybourn-Langton said that a change was required at a national level, especially with regards to an air quality strategy and scrappage funds for diesel vehicles. The Chair said that a Government "cap" on Uber licences could be beneficial and both the Mayor of London and London Councils have previously lobbied along these lines. Councillor Rice said that caution needed to be taken when it came to presenting statistics on the effects of poor air quality. She said that not all the deaths were a direct result of air pollution.

Councillor Demirci felt that lobbying for more transport powers should take place. She said that there were, however, areas that the boroughs could have a direct

influence on, like car clubs and a reduction in private car use. Councillor Demirci voiced concern that a number of local authorities were not making any space for car clubs, and there was a great deal that boroughs could do to meet these various challenges.

The Chair noted that “floating” car clubs could lead to a larger number of drivers giving up their cars. He said that a representative from Zipcar (Kate Hinton) and Drive Now (James Taylor) were present to get their perspective of where we were at. Zipcar flex currently operates in four boroughs in south west London and Drive Now in four boroughs in north east London. James Taylor mentioned that car sharing in Germany was now taken up by 1.7 million members, increasing from about 150k members within six years. He felt that London had the opportunity for such growth, but the boroughs needed to work more closely together to achieve this. It was not beneficial for a driver to have to get out of a car and potentially into a new one when they crossed borough boundaries. A target of 1 million car club members had been set a number of years ago in London by the Car Club Coalition and there was a now a need to look into how this target might be achieved. Incorporating different operating models needed to be looked at more widely as well. There was also the need to meet the MTS targets and to change behaviours.

Kate Hinton said that orbital trips were used more by drivers (east to west), rather than radial journeys. James Taylor said that none of their cars were diesel and they are looking to increase their electric car offer. Kate Hinton said that 16per cent of Zipcar’s fleet were now electric (EVs) and the aim was to have 80per cent EVs by 2025, although a significant increase in infrastructure was needed. Oliver Lord said that half of all car journeys were made in outer London and there was high car ownership in these boroughs. A more cohesive use of car clubs was needed. The Chair thanked Laurie Laybourn-Langton for his presentation.

**Decision:** The TEC Executive Sub Committee:

- Agreed that Alan Edwards would send round to TEC Executive members the slides from the presentation and a link to the report that was published earlier in the year; and
- Noted and commented on the report.

#### **4. Cleaner Vehicle Checker**

The TEC Executive Sub Committee considered a report that informed members of a “Cleaner Vehicle Checker” that the GLA would be introducing. The checker would tell those who wanted to buy a new car, the emission performance of that car in real world driving conditions. The aim would be to influence purchasing decisions towards those cars that created less pollution.

Oliver Lord, Deputy Air Quality Manager, GLA, introduced the report and made the following comments:

- Diesel cars do not currently perform to set emissions standards and the UK will be phasing them out. Other countries are planning to ban diesel cars much earlier.
- The Cleaner Vehicle Checker was a web-based tool that would rate how well your car was performing from A+ (best) to H (worst).

- Findings from Emissions Analytic showed that some diesel vehicles did perform just as well as some petrol vehicles and the public should be made aware of this.
- TEC Executive endorsement was now sought to agree that the Cleaner Vehicle Checker was a worthwhile project.
- There would also be a service for fleets of cars (a “fleet checker”). This would let organisations know the rating their fleets would get if all their vehicles were replaced with Euro 6 compliant vehicles.
- The aim of the Cleaner Vehicle Checker was to influence procurement decisions. This could, in turn, affect parking tariff ratings (eg an A+ rated vehicle might not have to pay a tariff or a lower tariff.)

### Q & As

The Chair said that TEC welcomed the Cleaner Vehicle Checker and would be very supportive of it. Councillor King asked how the success of the vehicle checker would be measured. Oliver Lord said that it was a web-based tool and success could be measured on how much the checker was used. Surveys could also be carried out to ascertain its popularity. Councillor King felt that this could become expensive, unless the tool was meaningful. Oliver Lord said that the checker was a consumer friendly web-based tool and was free of charge.

Councillor Usher asked what the car manufacturers thought of the Cleaner Vehicle Checker. Oliver Lord said that they had not challenged this yet and would soon have to produce similar tests themselves. The checker was simply a “nudge” tool. Councillor Demirci said that she welcomed the checker. She said that this would be particularly useful for local Councillors who sat on procurement committees who made the decisions as to which vehicles/fleets to purchase for their borough.

Councillor Doyle said that the checker was a great initiative. He asked whether any other data would be provided along with the rating. Oliver Lord said that the checker was based on NO<sub>x</sub> emissions, although CO<sub>2</sub> emissions could also be highlighted. Owain Mortimer asked whether any other networks had been engaged with this. Oliver Lord confirmed that they had.

**Decision:** The TEC Executive Sub Committee noted and welcomed the report:

## **5. Month 3 Revenue Forecast 2017/18**

The TEC Executive Sub Committee received a report that outlined actual income and expenditure against the approved budget to the end of June 2017 for TEC and provided a forecast of the outturn position for 2017/18

Frank Smith, Director of Corporate Resources, London Councils, introduced the report. He informed members that, as at the end of June 2017, there was a projected surplus of £786,000. Frank Smith said that general reserves to 31 March 2018 was forecast to be £2.272 million, which was slightly in excess of the 15 to 18% benchmark range previously agreed by TEC. He said that the treatment of general reserves in excess of the benchmark range would be discussed at the TEC Executive meeting in November 2017.

Frank Smith said that receipts for the London Lorry Control PCNs were forecast to break even against the budget of £800,000. The Chair said that boroughs previously

had to pay towards the Scheme and no longer had to. Frank Smith said that PCN receipts now far exceeded the cost of the Scheme. Spencer Palmer, Director of Transport and Mobility, London Councils, informed members that improvements were being proposed to the Scheme, including the use of more modern technologies.

Councillor Usher asked about the Taxicard underspend and whether this would pick-up by the end of year. Frank Smith said that the Taxicard scheme had been underspending for a number of years. Spencer Palmer said that there had been a decline on year-on-year Taxicard usage, although this now look set to be picking up again in the current year.

**Decision:** The TEC Executive Sub Committee:

- Noted the projected surplus of £786,000 for the year, plus the forecasted net underspend of £830,000 for overall Taxicard trips, as detailed in the report, and;
- Noted the projected level of Committee reserves, as detailed in paragraph 5 of the report, and the commentary on the financial position of the Committee included in paragraphs 6-8.

**6. Minutes of the TEC Executive Sub Committee held on 20 July 2017 (for agreeing)**

The minutes of the TEC Executive Sub Committee meeting held on 20 July 2017 were agreed as an accurate record.

**7. Any Other Business**

Spencer Palmer TEC Executive that he had been approached by the Department for Transport about their proposed plans to grant Heathrow Airport Holdings Ltd (a private company) civil enforcement powers similar to those held by London boroughs. The proposal is to transfer responsibility for enforcement of traffic and parking rules on Heathrow's road network from the Police to the airport authority. The aim is to achieve better enforcement and therefore compliance for traffic management, safety and security reasons.

DfT and London Councils officers have been considering how TEC's functions in terms of setting penalty charge levels for London and operating the independent appeals service through London Tribunals to apply to Heathrow in the future. Mr Palmer explained that it would seem that if DfT make the necessary legislative changes to grant Heathrow the appropriate powers and responsibilities, including paying any apportioned costs in terms of appeals for Heathrow contraventions, there should be no negative implications for TEC and London Councils. He said that it was proposed to bring a detailed paper on this matter to TEC on 12 October 2017 meeting.

Jade Appleton, Conservative Political Adviser, London Councils, said that a discussion would need to take place with the borough of Hillingdon before any paper on this issue was brought before TEC. The Chair said that he would be happy to proceed on this basis.

Councillor Demirci voiced concern that the appeals process could be "clogged-up" with appeals from Heathrow. Spencer Palmer said he had asked for a forecast of enforcement and likely appeal volumes but was confident that any increase would be



relatively small. If the proposal were to go ahead, Heathrow would pay an appropriate proportion of the Tribunals fixed costs, as well as per appeal costs to cover any additional adjudicator and administrative costs. Frank Smith said that the experience gained from managing the POPLA contract would help mitigate any risks to London Councils when entering any potential formal agreement.

**The meeting finished at 11:15am**