

▶ Draft 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 intense. 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 there is a lack of clarity and detail around deliverability of many of the proposals within the draft LES. There is not enough detail about the practicalities of implementation, for example in the waste section, there is little evidence to suggest that some of the targets can be

met. We believe that the Mayor should provide more detailed interim steps that would be needed to reach some of the targets.

3. 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.
4. 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.
5. 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.
6. 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.
7. 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 for the UK to go beyond EU limits and introduce stronger measures, for example aiming to achieve World Health Organisation targets for air quality. 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.**
8. 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.
9. 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.
10. 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 per cent average recycling rate is achievable by the boroughs across London, 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.
11. 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.

12. 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?**
13. 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 good leadership on some areas where the government has been silent, for example on decarbonising the energy system and air quality. London Councils welcome the Mayor's proactive approach in discussing these difficult issues, and urge the Mayor to 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.
 14. 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?**
15. 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.
 16. 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.

17. 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?**
18. 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).
19. 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 1st 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.
20. 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.
21. 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?

22. 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.
23. 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

24. 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.
25. 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.
26. 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.
27. 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.

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

28. We principally support this aim and welcome the focus on increasing 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.
29. 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.
30. 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

31. 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 recognition that the 'able to pay' sector will be crucial to deal with in the future. While tackling fuel poverty should be a central pillar of any energy efficiency strategy, and given the multiple benefits that can be achieved by targeting fuel poverty, 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.
32. 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

33. 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.
34. 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.
35. 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.
36. 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.
37. We also want to highlight that more focus should be placed on reducing waste occurring and reuse materials, as the waste hierarchy suggests, to increase efforts in this area.
- 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.**
38. 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.

39. 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?

40. The Mayor has shown good leadership in focusing on improving air quality in London and the ambitions in this chapter of the draft LES are 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.
41. 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.
42. London Councils supports the focus on modal shift and feel that the benefits of modal shift to more active and 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.
43. 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 revisiting this target.
44. 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.

45. 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.
46. Car use reduction is essential in London. However, 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.
47. 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.
48. 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 boroughs with the final round of consultation on the ULEZ towards the end of 2017.
49. 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.
50. 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.
51. 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.

52. 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.
53. 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.
54. 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.
55. 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 exercise¹.

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

56. 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.
57. 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.
58. 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

¹ 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.

59. 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?

60. 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.

61. 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.

62. 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.

63. 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 developments consider air quality at pre-design stage. This could help ensure those buildings that accommodate large numbers of people and/or vulnerable people, for example schools and care homes, are not built in places with poor air quality or that suitable 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)?

64. 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 per cent 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)?

65. 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.
66. 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.
67. 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.
68. 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.
69. 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.

70. Some cases where national planning policy has overridden London policy in relation to development on Metropolitan Open Land have been raised with London Councils. We are concerned by the implications of this for London's green spaces and we hope to see safeguards in the forthcoming London Plan.
71. 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.
72. 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.
73. 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 previously mentioned.
74. 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. We discuss Energy from Waste (EfW) plants in chapter 6 of the response.
- Q17. Please provide any further comments on the policies and programmes mentioned in this chapter.**
75. 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 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.

76. 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?

77. 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.

78. 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 sustainable buildings and 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?

79. 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.

80. 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 Mayor's 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 roles as being to promote the natural capital value of Green Infrastructure in London. We welcome the Mayor's offer to work with London Councils on this.
81. 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.
82. 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.
83. 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.
84. 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?**
85. 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, maintenance and area space 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; SINC; the accessibility of the space; the services on offer (playgrounds, places to sit etc.). We would be happy to collectively produce such quality scores.

86. 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.
87. 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.
88. 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 can make places more attractive in which 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.
89. 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, given they play a significant role in managing much of London's green space.
90. The inclusion of Sites of Proposals of Importance for Nature Conservation (SINC), 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'.
91. 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.

92. 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.
93. 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.
94. 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?

95. London Councils see the ambition of increasing London's tree canopy cover as a positive addition to the draft LES in principle. However, 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 that particular location. 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?

96. 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.

97. 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.

98. 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.

99. 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.

100. 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?

101. 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.
102. As has been mentioned in our response to Chapter 5 (Green Infrastructure) achieving necessary performance (of green infrastructure or CO₂ 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.
103. 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.
104. Decentralised energy can be a useful tool at the Mayor's disposal to reduce CO₂ 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. For example, the use of fuel cells should be investigated and supported across the capital.
105. 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.
106. 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.
107. 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.

108. 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?

109. 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]).

110. 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 (for example 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 Econometrics² report 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.

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

111. 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.

112. 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?

113. 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.

114. Non-domestic and commercial buildings will play a big part in reducing CO₂ 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 CO₂ emissions and believe that the expanded focus of RE:FIT is a good thing, as is the Mayor's focus on commercial buildings.

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.

115. 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).

116. 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.

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

118. 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 per cent 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.
119. 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?

120. 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 ambition, and we would seek further clarification on what the phrase means in real terms, whether it is zero waste to landfill or zero waste arising for example.
121. 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 recycle (as are boroughs, since higher quality materials fetch higher prices than poor quality materials) yet the Mayor continues to focus on a tonnage target.
122. 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.
123. 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-£319m³. 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 and existing key performance indicators within these contracts are 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.
124. 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.

³ Draft London Environment Strategy, page 279

125. 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*”⁴ 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.
126. 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.
127. 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. We seek the Mayor’s support for lobbying by London Councils and boroughs for a return to more effective enforcement powers, together with consideration of best practice internationally about options for enforcement where waste is not collected from individual properties.
128. 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.
129. 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.

⁴ 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/>]

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?

130. 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.
131. 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.
132. 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.
133. 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.
134. 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).
135. 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?

136. 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 to 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?

137. 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.
138. 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.
139. 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?

140. 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' schemes⁵. 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

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

single-use packaging. The recent initial steps by government to start looking at this should be welcomed and supported by the Mayor.

141. 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 government is now focused on implementation, again without the GLA seeming to sit on any of the working groups. London Councils is open to working with the Mayor to engage with Defra and the other relevant organisations to develop new powers for local authorities in this area.
142. We also note that the issues of littering and fly-tipping are not covered in the draft LES. While we are aware that boroughs have responsibility over this area, we would like the Mayor to acknowledge the need for more funding to enforce more effectively and for the Mayor to use his prominent role to help boroughs tackle littering and fly-tipping through joint awareness and behaviour change campaigns.

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

143. 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*".
144. 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.
145. We support the use of local waste facilities by waste authorities 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.
146. 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.

147. 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).
148. 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. It is also essential that any new EfW (such as AD plants) are held to the highest possible standard in terms of air quality.
149. 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?

150. 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.
151. 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.
152. 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.
153. 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.
154. 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 50,000m² of impermeable highway surface per year in London) is not referenced in the draft LES.
155. 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.
156. 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.
157. 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.
158. 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.

159. 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.
160. 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?

161. 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 deal with and recover from incidents quickly.
162. 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.
163. 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.
164. 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 London⁶. 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?

165. 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.
166. 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.

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

167. 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.
168. 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 inflation⁷.
169. 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?**
170. 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.**
171. 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.

⁷ <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?

172. 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.
173. 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.
174. 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.
175. 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
176. London Councils does not have a formal position on Heathrow Airport expansion and will leave affected boroughs to comment on this.
177. London Councils supports in principle the promotion of use of good acoustic design through the London Plan.
178. 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. This should be recognised in the design of buildings in the London Plan.

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?

179. 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?

180. 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.

181. 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

182. 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.
183. 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.
184. 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.
185. 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.
186. 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.