

**Date: 28 September 2017**

**Item: London Environment Strategy – Consultation  
Response**

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**This paper will be considered in public**

## **1 Summary**

- 1.1 The purpose of this paper is to update the Safety, Sustainability and Human Resources Panel on the Mayor's draft London Environment Strategy (LES), published for consultation on 11 August 2017.

## **2 Recommendation**

- 2.1 **The Panel is asked to note the paper.**

## **3 Background Information**

- 3.1 The London Environment Strategy (LES) is one of a number of strategic documents the Mayor is statutorily required to produce, including the Mayor's Transport Strategy MTS and London Plan. The LES combines and updates separate specific environmental strategies published under previous administrations, covering climate change mitigation and energy, climate change adaptation, biodiversity, air quality, waste, noise, water and ambient noise.
- 3.2 The six key aims of the LES are:-
- (a) 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
  - (b) For more than half of London's area to be green and for tree canopy cover to increase by ten per cent by 2050
  - (c) For London to be a zero carbon city by 2050, with energy efficient buildings, clean transport and clean energy
  - (d) To make London a zero waste city
  - (e) for London and Londoners to be resilient to severe weather and longer-term climate change impacts

- (f) to improve Londoners' quality of life by reducing the number of people adversely affected by noise and promoting more quiet and tranquil spaces

3.3 The draft LES was published for public consultation on 11 August, closing on 17 November. The Mayor also published the Solar Action Plan, intended to increase the level of solar power in London and a Fuel Poverty Action Plan, alongside the LES to inform responses.

## 4 Transport-related policies

4.1 TfL was involved in the development of the LES and it is closely aligned with the MTS on policies addressing transport air quality, energy and carbon, and noise. The Air Quality chapter of the LES describes how transport measures - such as the Ultra Low Emission Zone - will complement measures to reduce emissions from other sources and reduce Londoners' exposure to high levels of air pollution. The Climate Change Mitigation & Energy chapter cross-references to MTS measures to reduce CO<sub>2</sub> emissions from road, rail and shipping. These include a commitment that all new single deck buses will be zero emission from 2020 and all new double deck buses will zero emission from 2025, resulting in the entire bus fleet being zero emission by 2037 at the latest. This, along with a major expansion in London's electric vehicle charging infrastructure and the implementation of Zero Emission Zones, will help ensure London's entire transport system is zero emission by 2050.

4.2 Transport emissions modelling undertaken by TfL has been incorporated into the Air Quality and Climate Change Mitigation & Energy chapters of the LES, and will be updated for the final versions of both documents.

4.3 MTS proposals on green infrastructure, biodiversity and resilience to climate change on the transport network reflect the London-wide approach covered in detail in the LES.

## 5 Non-transport policies affecting TfL

5.1 A number of LES policies not related to transport directly impact on TfL as an organisation. These include:-

5.2 **Energy for Londoners** – The LES states an ambition for TfL-controlled rail services to become zero carbon by 2030, either through direct connection or grid-supplied. TfL will support the trial of the Mayor's Licence Lite initiative (intended to stimulate installation of low carbon energy in London) by acting as the initial customer for locally purchased low carbon electricity, using the GLA as a licenced supplier. As part of the GLA group TfL will pursue options to power services through local renewable generation in London and also through power purchase agreements to support the delivery of renewables outside of London. TfL's programme of solar installations through RE:FIT form a major deliverable of the Solar Action Plan.

5.3 **Zero Carbon Homes** – The LES reinforces the Mayoral policy for new homes in London to be zero carbon. Zero carbon development will be further embedded in the next London Plan. TfL will follow the zero carbon homes

requirement in any housing development on TfL land, as required by the London Plan.

- 5.4 **GLA Group Commitments** – Chapter 11 of the draft LES describes how functional bodies of the GLA will lead by example to support delivery of the strategy. Measures include implementing the GLA group responsible procurement policy, accelerating the uptake of Ultra Low Emission and Zero Emission Vehicles, supporting LES waste targets in operations and ensuring GLA group investments maximise financial benefits.

## **6 Conclusion**

- 6.1 TfL supports the London Environment Strategy and will undertake to meet its objectives. TfL will respond to the consultation on the strategy in order to provide views on specific points raised in the document. TfL's draft consultation response can be found in Appendix A.

### **List of appendices to this report:**

Appendix 1: Draft Consultation Response

### **List of Background Papers:**

None

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Dear Shirley,

### **London Environment Strategy – Response to Public Consultation**

Thank you for the opportunity to comment on the draft London Environment Strategy. Transport for London (TfL) is supportive of the vision and aims of the strategy and will support delivery of its policies and proposals both as London's transport authority and as a member of the GLA Group. We believe that the close alignment of the LES and the Mayor's Transport Strategy (MTS), will underpin achievement of the Mayor's desired outcomes for both London's transport system and its wider environment.

TfL is already undertaking many of the actions committed to in the LES. On air quality, we are supporting the Mayor's proposals to bring forward the introduction of the Ultra Low Emission Zone (ULEZ) and expand it. We are buying cleaner buses to meet the aim for the whole TfL bus fleet being zero emission by 2037, putting us on the path for the entire transport system being zero emission by 2050. We are increasing the level of tree canopy cover on the TfL road network and working to install additional sustainable drainage infrastructure across the transport network.

It is clear that the Mayor and TfL alone cannot achieve the aims of the LES. Appendix 3 provides a useful summary of the roles and responsibilities associated with the LES topics. It is critical that action is taken by all levels of Government and by all businesses, organisations, groups and individuals if we are to fully realise the LES. We must therefore, continue to lobby central government, in particular, to do more to address the environmental challenges London faces. They have some of the strongest levers in terms of new and amended legislation, fiscal incentives and the ability to make fundamental changes to UK infrastructure and economy. Some of these opportunities are highlighted further below.

In response to the consultation on the draft LES, I would like to make the following comments on behalf of TfL:

#### **Air Quality**

London's air quality health crisis is one of the biggest environmental challenges we currently face. TfL agrees strongly with the approach to addressing the problem set out in LES. Reducing emissions from transport plays a major role, including the actions and proposals that are underway, such as introducing T-charge, ULEZ and cleaning up the TfL bus fleet. However, it is right that LES includes many measures to address non-transport sources, such as from buildings and construction. TfL will support this by meeting or exceeding the emissions standards set out by the Non Road Mobile Machinery (NRMM) Low Emission Zone for construction and maintenance activities on the Transport for London Road Network.

TfL agrees strongly that a holistic approach to tackling air pollution emissions and greenhouse gas emission is being taken. This will maximise outcomes and help avoid unintended consequences similar to that which have happened in the past, such as the 'dieselisation' of the fleet. The Road Map to Zero Emission Transport, presented in LES (and MTS) is rightly ambitious and provides clear direction for where London needs to head, which will help TfL and other vehicle and fleet operators plan.

With regards to 'emergency measures', TfL agrees that it is important to take action to reduce the impact of high pollution events, which is why we have implemented a system of alert messaging on high pollution days across our network of roads, bus stops and tube/train stations. However, we must be confident that any new measures, such as vehicle restrictions, do have a net measurable benefit on reducing air pollution and human exposure and are cost effective compared to other possible measures, before they are implemented.

Lastly, on air quality, TfL strongly supports the Mayor's call for central government to do more. The final published UK Air Quality Plan is a missed opportunity. To address the air quality problem faced by London, and other areas of the UK, we must continue to lobby government to:

- Introduce a national vehicle scrappage fund to help retire those diesel cars and vans bought in good faith as a result of Government incentives and to minimise the impact of Clean Air Zones on individuals and businesses;
- Reform fiscal incentives such as vehicle excise duty (VED) which continue to encourage people to buy diesel cars, contradicting the local action proposed in the Plan; and
- Provide additional powers to London and other local authorities so a comprehensive plan can be developed which addresses all major emissions sources. These additional powers should be conferred through a new Clean Air Act which would also provide a legally enforceable right to clean air.

## **Green Infrastructure**

TfL is supportive of the principle of making London greener and acknowledges the role of transport in achieving this. This is demonstrated through the draft Mayor's Transport Strategy policies and proposals related to biodiversity, increasing street trees, sustainable drainage and Healthy Streets. TfL supports the overall emphasis given to green infrastructure within the strategy and agrees with the aspiration for London to become a National Park City. The strategy sets out that the GLA will work with stakeholders to fully define and deliver the National Park City, and TfL are keen to be fully involved in this work. This is an area where action is required from a large number and variety of stakeholders and the strategy could go further in encouraging more challenge and scrutiny in delivery of green infrastructure.

Chapter 5 on Green Infrastructure could be strengthened by the inclusion of an explicit proposal that all new developments in London achieve a net gain in biodiversity and that the Mayor will seek to ensure that supporting policies are included in the revised London Plan. This would complement Policy 7 of the draft MTS, which states that the Mayor, through TfL and working with the boroughs, will ensure that transport schemes will, wherever practicable, deliver a net positive impact on biodiversity.

In addition, more clarity is required on how biodiversity should be measured in order to demonstrate 'net gain'. The strategy has different initiatives for measuring Green Infrastructure and biodiversity (greenness index, greenspace factor, biodiversity offsetting, challenges map etc). The inclusion of a single summary explaining the nature and purpose of each would help provide more clarity.

TfL welcomes the reference to innovative approaches to the improvement and management of green spaces.

### **Climate Change Mitigation and Energy**

TfL supports the Mayor's ambition for London to be a zero carbon city by 2050 and believe that the policies and proposals for transport outlined in the LES and MTS can help meet this goal. The proposed approach and pace of change in emissions reduction is realistic, if supported by clear central government action to meet national carbon reduction targets. It is important that progress against the pathway to 2050 set out in the strategy is tracked and communicated openly to Londoners, through the London Zero Carbon Pathways tool.

TfL is supporting the Mayor's actions to help put London's energy system on track for a zero carbon city. We are embarking on a programme of solar installations across the TfL estate and developing other decentralised energy opportunities, for example capturing waste heat from the Tube. We are investing in improving the energy efficiency of our operations and supporting the installation of small scale renewable energy through the Licence Lite initiative.

The LES should encourage business and public sector organisations to reduce emissions from all of their operations, not just from energy use. For example embodied carbon emissions in the construction phase make up a significant proportion of emissions associated with transport infrastructure. Proposal 6.1.4c should extend to reducing lifecycle emissions from all of London's infrastructure, rather than just buildings, for example through encouraging major infrastructure owners in London to follow PAS2080 Carbon Management in Infrastructure.

### **Waste**

TfL supports the aims and objectives of the waste chapter of the strategy and will lead by example in reducing the waste from its operations and achieving a 65% recycling rate for municipal waste. The strategy should, however, highlight the importance of managing waste from construction, demolition and excavation; recovery and reuse of waste from these activities represents a significant opportunity to support a low carbon circular economy.

### **Climate Change Adaptation**

TfL is aware of the threat posed by Climate Change and has been working with the GLA and the London Climate Change Partnership to better understand the specific risks and possible mitigation in order to improve the resilience of transport in London. TfL is supportive of the policies and proposals set out in the LES. However, there is generally a need to raise the profile of the issue. The proposed sector based approach (Policy 8.1.1) will help to achieve this. It could be further strengthened by being highlighted as a key issue in the Mayor's foreword. The benefits of green infrastructure in helping to make London more resilient should also be highlighted in this chapter.

## **Ambient Noise**

As the LES points out, transport is a significant source of noise pollution in London. Achieving the shift to sustainable modes of transport and the transition to zero emission vehicles described in the MTS and LES will deliver a significant reduction in road noise. In addition, TfL will deliver the proposals set out in the LES to further reduce noise from road transport, as well as monitoring and managing the impacts of Tube and rail services.

## **Strategy Navigation**

There is large number of policies and proposals in the LES impact of a number of environmental aspects (for example air quality, climate change mitigation and noise). It would be useful if the GLA could provide a way of making it easier to navigate the document and find all policies relevant to a subject.

## **Delivering, funding and monitoring the strategy**

The LES would be greatly strengthened with the addition of a chapter summarising how it will be delivered, funded and monitored, similar to Chapter 6 of the draft MTS.

Achieving the aims of the LES will require additional funding that is both stable and secure. Without adequate funding, quality of life, health and social integration are at risk, and there will be damage to London's economic growth and limit London ability to become sustainable and resilient to climate change.

As set out in Chapter 6 of the draft MTS, there are a number of funding challenges that TfL faces. Part of overcoming these challenges requires that the Mayor must have the right range of powers in order to ensure continued investment in the renewal and expansion of the transport system. These are also set out in Chapter 6 of the draft MTS. Without this, it will not be possible to deliver an affordable transport system that is accessible to all and provides a better quality of life. Delivering all the transport elements of the LES is likely to require central government taking action to provide the right new powers to London. Continued lobbying on this issue is therefore critical.

To ensure London stays on track to deliver the aims of the LES, regular and public scrutiny of progress is required. LES should include a commitment to produce a regular public progress report based on a wide-ranging programme of monitoring and evaluation. Where necessary, the relevant delivery plans should be adjusted to put progress back on track.

I look forward to working with you and the GLA to support delivery of the LES. Please don't hesitate to contact me to discuss any aspect of the comments above.

Yours sincerely,

Alex Williams

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Transport for London