

London Forum recommendations for the Mayor's Environment Strategy by David Lewis

Previous Mayors have produced an impressive range of strategies for aspects of the environment: air quality, water, wastes, green spaces and biodiversity, noise, and climate change adaptation and mitigation. However, the bulk of these documents has sometimes seemed disproportionate to their practical impact. They have also sometimes neglected the interactions between different aspects of the environment. We therefore strongly welcome the decision to replace these documents with a single unified Environment Strategy. We hope this will be a comprehensive but concise assessment of the current state of London's environment and the likely impacts of current trends. It should be authoritative and take maximum advantage of the scientific expertise available in London. As a minimum it should cover the period to the mid-point of this century.

The starting-point in drawing up the Environment Strategy should be the overall condition of London's environment and the current prospects for significant changes in it, whether positive or negative. London is a very large and growing city with a massive environmental footprint. The increasing numbers of residents and visitors suffer from what is sometimes an unsatisfactory quality of life and could in a worst case become more unsatisfactory.

The Environment Strategy should not be circumscribed by the scope of the Mayor's current powers and duties. This is essential in order to provide an overall perspective and a sound basis for policy choices. Some aspects of the environment are currently regulated by national or European targets or legislation or in some cases by national or European regulatory agencies. The Mayor should take maximum advantage of the discretions available to him under wider regulations, and where necessary should seek formal delegation to London or new powers specific to London.

Environmental regulation in the UK has been profoundly affected by European Union legislation. National Government has indicated it will seek to preserve the force of such legislation, at least in the short term, even if the UK ceases to be subject to EU law. The Mayor should seek to ensure this commitment by National Government is honoured, and that if modifications are introduced in the course of transposition from EU to national legislation these should have the effect of making environmental regulation more effective, not weakening it.

The previous Mayor adopted the objective of making London a world leader in improving the environment. London has links with other world cities in Europe and elsewhere to consider shared problems and promising solutions. Those links have been based on a shared conviction that the future of the world economy is a green future in which new technologies make possible major reductions in the use of carbon and other physical and biological resources. It is now realised green policies are not necessarily a barrier to prosperity, but can provide the route to a more sustainable form of prosperity and a better quality of life. As the leading sector of the UK economy, it is very appropriate London should continue to seek a pioneering role in this respect. The Mayor should encourage and facilitate Borough councils, and where appropriate neighbourhood fora, to play their part in this.

As well as governments the Environment Strategy needs to recognise and promote the roles of other stakeholders. It is vital that the general public can be persuaded to develop lifestyles that are less damaging to the environment. There should also be opportunities

readily available for people to volunteer to improve and maintain their local environments. In this and other respects the third sector has a key role.

The private sector will play a vital role in improving the environment, and more especially in the transition to a circular economy, which we discuss below. The Environment Strategy needs to show full awareness of that: it needs to be elaborated and implemented in partnership with private firms and other relevant organisations.

Reducing greenhouse gas emissions

The UK Government has a target of reducing emissions of greenhouse gases by at least 80% of 1990 levels by 2050, and has set a series of five-yearly carbon budgets which currently run until 2032 and restrict the amounts of greenhouse gases the UK can legally emit in the period in question. London adopted the target of reducing the city's carbon dioxide emissions by 60% below 1990 levels by 2025. But current emissions are running above that trajectory, and there is an immediate need therefore to achieve faster progress in reducing carbon dioxide emissions across London.

Moreover there are several reasons why it is now even more important for London to have strong policies on reducing emissions. The goal now adopted internationally on the basis of scientific advice is to limit global temperature rise to 1.5°C, a much more stringent limit than the 2°C figure adopted previously. Second the US Government has decided to cease co-operating in international action in this field. Lastly there are some doubts about whether the new UK Government will be sufficiently committed to pursuing existing UK policies in this field. We welcome the current Mayor's stated goal of a zero carbon city by 2050, as part of the global effort to limit climate change. The most important mechanisms for achieving London's targets are planning and transport policies; other policies in the Environment Strategy will also have to contribute. We think the Mayor should also lobby to tighten national standards on energy performance of buildings and products, and to reduce the carbon content of electricity generation.

Of the energy scenarios produced for the London Enterprise Partnership only the 'low demand' scenarios are likely to be compatible with the existing UK target of 80% carbon reduction by 2050. That is in conflict with the Infrastructure Plan, which envisaged an overall growth in energy use across London to 2050. To achieve falling energy use there will have to be radical reductions in emissions from transport through some combination of reduced need to travel, active travel and low-carbon vehicle technology. Over and above improvements in the energy performance of buildings there will also need to be a very large shift away from use of natural gas for heating, including domestic heating. These changes have massive implications for the Infrastructure Plan and will require different balances between energy and other sectors; between energy efficiency, conventional generation, low-carbon generation, and distribution; and in other energy-critical forms of infrastructure such as transport and communications, with knock-on effects for economic strategy and spatial planning. This amounts to a major infrastructure challenge in its own right, and the Infrastructure Plan must be recast to cover that.

Adaptation to climate change

The Greater London Authority Act was revised in 2007 to place a legal responsibility on the Mayor to prepare and keep up to date a Climate Change Adaptation Strategy for London.

The previous Mayor produced a strategy in 2011 under the title Managing Risks and Increasing Resilience. But it now needs updating, and should now form an integral part of the Environment Strategy.

In July last year the Committee on Climate Change's Adaptation Sub-Committee published a comprehensive and authoritative assessment of climate change risks and opportunities for the UK, and is now about to publish its second statutory assessment of the National Adaptation Programme. The Mayor's Environment Strategy will have to consider the implications of that assessment for London, formulate a satisfactory response, and make provision for its implementation.

Borough councils have done much work in recent years to assess and plan for the risks of flooding, and we return to that subject below and also to the adequacy of London's future water supplies. Much further work also needs to be done to assess and manage the built environment's contribution to overheating and ensure the continuing viability of London's natural environment.

Air pollution

We fully support the priority the Mayor has given to complying with legal NO₂ limits as soon as possible and to doing that by reducing emissions from vehicles. Compliance with PM_{2.5} limit values is also a minimum requirement. Moreover reducing concentrations below those limit values reduces the harm to health proportionately; the Environment Strategy should pursue that goal too. For the longer term the Strategy should look towards the elimination of diesel vehicles from London and should facilitate the move to zero emission vehicles, in particular by ensuring the necessary infrastructure is made available. The Strategy for air pollution also needs to embrace controlling emissions from other forms of transport including boats, aircraft and construction machinery; and road vehicle emissions from sources other than the engine (for example from brake blocks).

Health-related emissions from the heating of buildings are another major source of air pollution, which has not been fully considered up to now. We have already noted that, if targets for reducing carbon dioxide emissions are to be met, there will need to be a very large shift away from use of natural gas for heating, including domestic heating. Eliminating health-related emissions will be a further powerful argument for change.

The circular economy

In contrast to an unsustainable take/make/dispose linear economy, a circular economy minimises both resource use and waste generation by keeping goods in use as much and as long as possible, and then returning unusable goods to use by the most efficient possible route, including repair and remanufacture as well as recycling. The transition to a circular economy should be at the heart of the Mayor's economic strategy. The Environmental Strategy should promote the new paradigm by supporting the development of facilities for re-use and repair, the design and development of innovative products, the introduction of appropriate business services and the financial underpinnings of a low-waste economy. The transition to a circular economy will require major modifications in consumer behaviour, product design and business models; but it can be expected to bring significant benefits in terms of reduced energy demand and lower carbon dioxide emissions, as well as reducing the amounts of waste requiring disposal. We understand the London Waste and Recycling Board is producing a 'route map' to a circular economy. We hope this work will be

sufficiently far advanced that the Environment Strategy will be able to identify and discuss specific challenges and opportunities, and how these will be addressed.

Waste management

In advance of a circular economy emerging in the longer term there will continue to be enormous quantities of waste to be managed. London has a poor record for the proportion of municipal solid wastes recycled. Progress towards the target of 50% recycling in 2020 (with an aspiration of 60% recycling in 2031) has been disappointing and performance has recently been declining. One factor influencing recycling rates is the arrangements for collecting recyclable material from households. Collection regimes vary from borough to borough, potentially leading to confusion for residents and incorrect use of the systems. The Environment Committee has previously heard proposals for some degree of convergence between boroughs in aspects such as what materials are collected for recycling and what streams they are separated into for collection. The type of collection system can also affect how easy it then is to recycle the material: getting the wrong material in the wrong collection stream can lead to whole truckloads being rejected at the recycling facility. The Mayor should work with local authorities and others to explore the potential for more consistency across London in what recyclable waste is collected and how it is processed.

One particular respect in which London as a whole can and should do better is minimising the amount of food waste sent for disposal and improving its management. Failure to separate out food waste has the effect that all municipal solid waste has to be regarded as biodegradable. Anaerobic digestion plants can convert food waste into an energy source, without creating pollution, and are a considerable advance on the old technique of composting. This technology could be used widely in London if food waste is collected separately in future, as already happens in many local authorities outside London.

The previous Mayor adopted the objectives of working towards managing the equivalent of 100% of London's waste within London by 2026, and stopping sending biodegradable or recyclable waste to landfill by the same date. While these objectives might seem admirable it would not be desirable to achieve them at the cost of increasing the amounts of waste incinerated. Incineration is unpopular with the public, adds to air pollution, and is not the best option in terms of minimising emissions of greenhouse gases. We therefore hope that achieving recycling and waste reduction targets will remove the need for further incinerator approvals, although there might be scope for more advanced thermal treatment of residual waste which cannot be disposed of otherwise.

Water management

The previous Mayor produced a non-statutory Water Strategy in 2011, Securing London's Water Future. The policies in that should be developed further and built into the Environment Strategy, and should be reflected in the Infrastructure Plan. London faces two problems in water management: on one hand the looming possibility of a shortage of water to meet the needs of a growing population, on the other hand an increasing risk of serious rain storms causing surface water flooding which would give rise to widespread property damage and risks to life. To an extent these two problems overlap. A significant proportion of the water put into supply by Thames Water at present is lost through leakage from old mains; rupture of a major water main can in itself cause serious surface water flooding in that area.

The previous Mayor was working with Thames Water to assess options for increasing supply. This work should be treated as urgent because of the ever-present risk of a severe drought: the conclusions should be incorporated in the Infrastructure Plan. The Mayor should use his influence to bring about further reductions in the amount of water lost by

Thames Water through leakage. The economic regulator limits the amount of money a water undertaker can spend on reducing leakage and for this purpose calculates the cost to the water undertaker of treating and replacing the lost water. We think that calculation should also take into account the damage and disruption caused for the public by major leaks and the reduction in the water undertaker's safety margin of available supplies.

There should also be a continuing effort to encourage customers, particularly in older premises to be more efficient in their use of water. Pilot schemes in some of the areas where supplies are under most pressure have shown promising results; the increasing use of water meters is a motivating factor.

One important method of reducing surface water flooding already incorporated in the London Plan is the technique of Sustainable Urban Drainage. Much remains to be done to make that fully effective, and it is now realised that it needs to be developed into integrated water management over a wider area. That approach is already being applied in some of London's Opportunity Areas and should be applied progressively throughout London. Many people think this offers the best hope for a sustainable water future for a large city like London.

The green environment

London's green infrastructure provides the city with great benefits. We commend the strategic approach to green spaces and the many services they provide shown by the All-London Green Grid and the report of the Green Infrastructure Task Force. We would wish to see these concepts become basic features of the Environment Strategy and lead to tangible results within this Mayoral term. Many green spaces would benefit from more innovative management. The Environment Committee have been carrying out an investigation into the management of public green spaces and we hope this will lead to recommendations that the Environment Strategy will be able to follow up.

The Thames is London's largest open space and there are many other natural and man-made waterways across London. The policies for the Blue Ribbon Network incorporated in previous versions of the London Plan need to be elaborated in the Environment Strategy to ensure that, in bringing other benefits to Londoners' quality of life, the contributions waterways make to London's biodiversity will be protected and enhanced.

Noise

Sounder City, the Mayor's Ambient Noise Strategy, was published in 2004. It described noise as the 'forgotten pollutant', the 'Cinderella' of the environment, but contended that it was increasingly seen as a key quality of life issue. The European Environmental Noise Directive in 2002 required noise mapping and preparation of action plans. The Mayor's Strategy set out a long-term plan for dealing with noise from transport and industrial sources. That plan now needs to be revised in the light of subsequent changes in circumstances, including the UK's decision to withdraw from the European Union.

Several aspects of noise have recently been receiving greater attention, including the increases in aircraft noise implied by more intensive use of Heathrow and London City Airports and noise from Underground trains, more especially in the context of introduction of the 24 Hour Tube. These are issues that need to be addressed in the Environment Strategy.