
Draft London Environment Strategy: A Joint Response from 14 Central and Inner London BIDs

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Introduction

This document has been prepared as a unified joint response by 14 Central and Inner London Business Improvement Districts (BIDs) regarding key aspects of his draft London Environment Strategy (LES) on which the BIDs have common ground.

This joint response has been endorsed by each BID named with the purpose of adding strategic purpose and context to the views expressed on the key issues. It should be read in addition to, not as a replacement for, any responses to the draft LES that individual BIDs may make.

To enable a focus on the matters that are most important to the BIDs, comments are concise and set out under headings that relate to the chapters of the draft LES and include relevant consultation questions. (Not all of the 36 questions are answered.) As appropriate, reference is also made to specific draft policies and proposals (e.g. (1.2.2.a)).

Overall, the BIDs are supportive of the Mayor's environment vision, and we welcome the opportunity to respond to the first overarching strategy of this kind.

Accordingly, where the detailed responses that follow call for changes to the draft LES, these calls are chiefly for one of three things:

- further detail/clarity, particularly on funding;
- greater ambition;
- and direct involvement of the BIDs in developing key initiatives.

Overarching questions

Relevant Questions

Q1. Do you agree with the overall vision and principles of this draft London Environment Strategy?

Q2. To achieve the policies and proposals in the strategy, which organisations should the Mayor call upon to do more (for example central and local government and businesses) and what should the priorities be?

Q3. Do you agree that this draft London Environment Strategy covers all the major environmental issues facing London?

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 performance against this integrated strategy?

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

Response

We support the overall vision and principles of the draft London Environment Strategy. The publication of an overarching and holistic strategy to pull together the various environmental responsibilities of the Mayor, and the challenges facing London, is welcomed. However, in our view some of the policies in this strategy are fairly limited in their ambition, and more clarity and commitment could be set out.

There is a particular lack of detail over funding, and after 2020 there is little clarity over policies to achieve the long term objectives. Stronger accountability and more detailed interim targets and roadmaps are needed to ensure the long term goals are achieved. In particular, policy interventions and projects will need to deliver against multiple environmental objectives simultaneously. Additional thought on how funding streams and decision making can be aligned, in line with the goal of a holistic environment strategy for London, would be beneficial.

We recognise that there is a significant role for businesses to play in protecting and improving London's environment. We agree that urgent action is required on issues like air quality and climate change, and BIDs have been at the forefront of innovative programmes on waste and delivery consolidation. We will continue to work closely with the GLA, TfL and local authorities to deliver on our shared agenda, and subject to sufficient additional funding and support we would welcome an expanded role for businesses and BIDs to improve London's environment.

However, a similar level of clarity on the responsibility of residents as that given to businesses would be helpful. A lot of progress could be made, particularly on air quality and waste, by encouraging behaviour change. The Mayor needs to articulate his role more clearly in promoting, and if necessary enforcing, individual Londoners to change behaviour on issues such as personal deliveries, the circular economy, recycling, and car usage.

The Mayor's powers over environmental issues vary significantly across the different areas and therefore a linked up approach between the local authorities and Central Government is essential for these items to be effectively addressed, targeted and controlled for measurable achievements. The Mayor will need to provide guidance and resources to local authorities, external bodies and organisations to ensure that they are equipped to implement and promote the policies that the strategy sets out. Existing tools such as the new TfL vehicle emissions checker or the deliverBEST tool which encourages more efficient freight deliveries are successful examples.

Overall, a clearer separation of exactly what the Mayor, through the GLA group, will be accountable for delivering, and what funding will be made available, would improve the document.

Air Quality

Relevant Questions

Q1. Do you agree that the policies and proposals outlined will meet the Mayor's ambitions for air quality in London and zero emissions transport by 2050? Is the proposed approach and pace realistic and achievable, and what further powers might be required?

Q2. Do you agree with the Mayor's policies and proposals to raise Londoners' awareness of the impacts of poor air quality?

Q3. Do you agree with the Mayor's policies and proposals to safeguard the most vulnerable from poor air quality?

Q4. 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)?

Q5. 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)?

Response

The Mayor should be aiming high when it comes to air quality standards; it is a critical public health issue and a serious reputational threat to our city. We agree that raising awareness of the impacts of poor air quality among Londoners is important. The Mayor should aim to educate about air quality alongside policy action and explain how individuals can change their behaviour (4.1.2).

Non-transport related emissions are a vital part of improving air quality. We recognise that the powers of the Mayor are often weaker on this issue. Yet the strategy should go further in identifying what the key sources are and how best to tackle them. For example, pollution from construction is significant contributor to poor air. Most responsible development companies already have lower emissions and particulate targets than those set out in the strategy. The Mayor could therefore consider a London-wide standard for construction emissions, to encourage all developers and contractors operating in London to work to a better standard (4.2.3b).

While the issue of wood burning stoves is identified as a significant cause of emissions, no clear action is being proposed (4.3.3c) beyond improved information and enforcement of existing rules. This seems an example of where little action is required from individual polluters, whereas larger businesses are subject to tougher regulations.

Many individual BIDs as well as Central London BIDs collectively have responded in more detail to the measures proposed to tackle transport related emissions during the recent consultation on the Mayor's Transport

Strategy. We strongly support the transport-related policies in the strategy, and recognise that shifting from journeys by private car, private hire vehicle (PHV) and taxis to walking, cycling or public transport is vital to meet the challenges faced by the city. With Central and Inner London having the most pressing need due to its poor air quality, a 'one size fits all' approach is not appropriate and many of the measures and targets set out in the strategy should be brought forward for Central and Inner London.

Ambitious public realm schemes to make the city more liveable to all are often undermined by political pressure to maintain existing parking provision. Greater clarity could be offered on the expectations of the Mayor towards more efficient use of road space, particularly when this could lead to improved walking and cycling infrastructure and urban greening.

We agree with the Mayor's intention to work towards zero-emission vehicles and transport, but believe that this process should be expedited, and that it is possible for London to have zero-emissions buses far sooner than the 2037 timeframe set out in the strategy (4.2.1.b). We also wish to see clearer and accelerated targets for zero emissions taxis and private hire vehicles (4.2.1.c), along with targets for coaches, and clearer rules and better enforcement on idling. It would be helpful to insert a note of caution about the rollout of autonomous vehicle technology, despite their improved road space efficiency, as there are risks of increased vehicle congestion, reduced incentives to walk, cycle or take public transport and continued particulate pollution.

While identified as a challenge, the capacity of London's power grid has not been addressed in the strategy and this is a major barrier to the successful rollout of EV charging infrastructure. An action plan for London power network and substation capacity should be part of this strategy given many of the proposed solutions require switching from fossil fuel sources to a decarbonised grid.

We recognise that it may be necessary to close selected roads in Central London for short periods of time when pollution levels are at their highest. However, we ask that the needs of businesses be considered during this process, and that essential servicing and deliveries are still able to take place during this time, particularly for restaurants and other venues requiring fresh produce (4.1.1a). We also request direct involvement in the proposals to reduce freight traffic at peak

times. The role of BIDs in piloting consolidation of waste and deliveries should be explicitly referenced in this part of strategy (4.2.1e) or perhaps used as example of best practice.

Green Infrastructure

Relevant Questions

Q1. The Mayor's ambition is to make London a National Park City. What should the attributes of National Park City be and what would we need to achieve for it to be considered successful?

Q2. 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?

Q3. Do you think the proposed policies and programmes will ensure London's important wildlife is protected and enhanced?

Q4. Do you think the proposed policies and programmes will be effective in increasing London's tree canopy cover?

Q5. How best can natural capital thinking be used to secure greater investment in the capital's green infrastructure?

Response

We are supportive of the overall ambition of this chapter to see more than half of London's area as green, in particular the proposal to create more pocket parks across the city, and to encourage greening in urban areas (5.1.1c). This element of the plan, however, could be more ambitious, and there is little or no detail about delivery. This is particularly disappointing given the range of fantastic ideas and precedents for both our city and other major world cities. A stronger link could also be drawn here to the important urban cooling effects of tree canopy. We request a direct role in shaping greening proposals for BIDs in their respective areas, as there has already been significant work in partnership with the GLA and local councils over long term public realm priorities in much of Central and Inner London. BIDs are also an ideal partner to link businesses, campaign groups and government and potentially leverage additional finance.

We understand that the London Plan will outline expectations for developers when it is published (5.1.1d), though requirements for more open and green space would have to be

balanced with the need for new homes and workspaces. The Greener City Fund of £3 million per year in our opinion will be wholly insufficient to encourage adequate tree planning or green space creation on the scale envisaged by the strategy (5.1.1e). With other priorities around affordable housing, public realm, transport, green construction and other social benefits, it will be challenging to extract sufficient contributions from development without sacrificing other essential priorities. We would therefore support innovative thinking on how to secure funding for green spaces, and strategic projects, including a standard Natural Capital Account for London's green spaces (5.3.1b, 5.3.1d). We would welcome the opportunity to develop a stronger evidence base and priorities for investment in partnership with the Mayor (5.3.1c). We recognise the importance of our green infrastructure to the liveability, reputation and beauty of our city, and the wellbeing of residents, workers and visitors alike.

The strategy outlines a proposal to make London the first National Park City (5.3.1e). We can appreciate the benefit to be achieved from attaching this label to highlight that London contains many important habitats and rare species, and the city could benefit from a single 'brand' to communicate greening initiatives. However, the proposals seem to duplicate agencies, organisations and powers that already exist to protect the natural environment. While there are no new restrictions against development or activity proposed, the strategy needs a clearer explanation of what a 'National Park City' is, the goals of the declaration, and what future regulations may be imposed to meet its criteria.

Climate Change Mitigation and Energy

Relevant Questions

Q1. Do you agree that the policies and proposals outlined will meet the Mayor's ambition to make London a zero carbon city by 2050? Is the proposed approach and pace realistic and achievable?

Q2. 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?

Q3. Which policies or programmes would most motivate businesses to reduce energy use and carbon emissions?

Q4. 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.

Response

We strongly support actions to make London a zero carbon city by 2050, though have some concerns about that lack of detailed interim targets and lack of accountability of the Mayor for delivery. We appreciate that the achievements of this goal will require coordinated action at international, national and local government level, as well as the policies and programmes of the Mayor. However, a more detailed roadmap of specific GLA initiatives would be beneficial alongside the London carbon budgets (aligned with UK government). Enhanced monitoring would be helpful, though no substitute for detailed actions plans and policies (6.1.5).

Once again the strategy does not explain in sufficient detail what additional funding, if any, will be made available to meet these ambitious goals. In particular, the document does not provide much detail or clarity on the Energy for Londoners programme. As this is a central plank of the energy efficiency and generation part of the strategy, far more detail on the programme, including the proposed funding and business plan, should be included in the final version.

On the topic of climate change mitigation in particular, businesses will need advice and financial assistance to meet climate change measures; and acknowledgment of this in the strategy is welcomed. We support helping public sector institutions through the RE-FIT programme, in particular a focus on cultural and heritage organisations (6.1.3a). Extending this to the wider commercial sector with a commercial boiler scrappage scheme, expansion of RE-FIT and enhanced guidance (6.1.3b) is strongly supported so that the 40% of emissions from commercial premises can be tackled.

We welcome the Mayor's Solar Action Plan and commitment to a goal of 100 MW of PV in London by 2030 (6.2.1). However, the proposals are heavily weighted towards

delivery on residential and public building. Guidance, procurement advice and inclusion in any reverse auction scheme should include commercial property owners as well as residential.

There is potentially a role for BIDs to play in these areas that have not yet been explored fully, sharing best practice and providing the link between these programmes and businesses as has been delivered successfully on waste and delivery consolidation pilots.

We are very supportive of the role that the forthcoming London Plan can play in ensuring new developments are carbon neutral (6.1.4), and welcome the inclusion of an enforcement and performance element to this policy (6.1.4b) given prior weakness in this area.

We welcome further work to develop priorities for district heating and decentralised energy, and would hope that this focusses both on commercial and residential properties, retrofitting and new build (6.2.2).

Waste

Relevant Questions

Q1. Do you agree that the Mayor's policies and proposals will effectively help Londoners and businesses to recycle more?

Q2. 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?

Q5. What are the most effective measures to reduce single-use packaging in London such as water bottles and coffee cups?

Q6. Please provide any further comments on the policies and programmes mentioned in this chapter.

Response

We are supportive of the aims that by 2026 no biodegradable or recyclable waste will be sent to landfill and by 2030 65% of London's municipal waste will be recycled. This is a stretching but achievable target. BIDs have pioneered efforts to consolidate waste services, and improve commercial recycling performance, alongside delivering wider congestion and air quality benefits. We welcome the Mayor pledging to work closely with BIDs to promote the waste contract

consolidation toolkit and to examine the feasibility of a commercial framework in London (7.2.2a). A strategic cross central London study and approach on deliveries consolidation is needed to extend the benefits of this approach across London. We would note that further action on commercial waste from SME's is required and innovations to make consolidation work across different sectors.

A circular economy approach to waste is supported, and we recognise that there are certain items, such as food waste, coffee cups and single use food packaging that are particular issues. BIDs welcome the support being offered to reduce commercial food waste, such as through the Greater London Authority's food save programme (7.1.1a).

However, greater action is required on individual behaviour to meet these targets and it has been a particular challenge to increase recycling rates in dense urban locations. Strong leadership from the Mayor is needed to encourage behavioural change.

We would welcome the introduction of a bottle return scheme for London, but this would need to be implemented in such a way that does not encourage it to be used as a way of generating income and facilitating the street population. The plastic bag charge has proven hugely successful in London, and this should be replicated in incentivising the increased use of reusable bottles and coffee cups, rather than those designed to be single-use (7.1.1b).

The investment funding in the circular economy is strongly supported (7.1.1c). London plays a leading role in finding innovative, sustainable solutions and growing green jobs. We welcome the proposals in Chapter 10 on support for green business and skills. However, the strategy could potentially have more to say about entrepreneurship and innovation throughout, particularly in relation to major educational institutions. Furthermore, we feel there is a missed opportunity to emphasise the importance of the links between London, European and international cities to driving forwards innovation and green growth, and the need to protect EU funding streams for many of the programmes mentioned in the strategy.

Climate Change Adaptation

Relevant Questions

Q5. Please provide any further comments on the policies and programmes mentioned in this chapter.

Response

We are supportive of the approach outlined by the Mayor to plan for the impacts of climate change including more regular heatwaves, water shortages and flooding; including changes to the planning system, reducing the impacts of the urban heat island, measure for public transport, and planning for future flood and water infrastructure.

As mentioned earlier, while identified as a challenge an action plan for London power network and substation capacity should be part of this strategy given many of the proposed solutions require switching from fossil fuel sources to a decarbonised grid.

Ambient Noise

Relevant Questions

Q4. Please provide any further comments on the policies and programmes mentioned in this chapter.

Response

We are broadly supportive of the approach outlined. The impact of the policies in the strategy elsewhere could be drawn out more in this section, such as the reduction of traffic noise.

We welcome the recognition that noise is an inevitable part of a vibrant city and the explicit reference to the recently published Mayor's Culture and Night Time Economy Supplementary Planning Guidance and the introduction an 'agent of change' principle designed to protect exiting licensed and cultural venues threatened by new residential properties (9.2.2).

Respondents

This joint response has been endorsed by the following on behalf of their respective organisations:

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