

JUST SPACE'S RESPONSE TO THE DRAFT LONDON ENVIRONMENTAL STRATEGY (LES)

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Key Issues

- The Mayor needs to make more use of his statutory powers in order to implement this Strategy
- The Strategy has loose policy language and distant time scales
- Monitoring indicators must be included in the document before adoption
- Community monitoring and citizens science should be supported
- The Strategy should be informed by discussions on the draft London Plan and not adopted until after the London Plan examination hearings
- No improvements have been made to the Strategy as a result of the IIA process
- The near silence on food growing should be remedied
- The Mayor should create an ambitious new fully licensed not for profit publicly owned energy company
- A wider application of embodied carbon is required
- There is a tension between maximizing recycling rates and achieving a circular economy in which products and materials are reused again and again. A wider understanding of the circular economy needs to be developed and integrated into policy and practice.
- The Mayor must ensure his other strategies, particularly the London Plan, Housing and Economic Development Strategies, carry forward and implement the proposals in the LES.

Framing Of LES

Delivery or Implementation

Just Space places much store on the actual realisation of a strategy, finding that often a strategy's intentions are not fulfilled in the appropriate and required ways to achieve the vision, principles and aims. There is a preference for the term implementation, which conveys much more than delivery. Implementation proposes the fulfilment of objectives and proposals, a sense of real purposeful action, rather than delivery's meaning of transmission or articulation. Both terms are sparsely used in this strategy. And it is to the IIA that one must turn for a clearer setting out of the "Role of the Mayor and Delivery of the LES" (p5 para 2.3). However, rather disappointingly, it states that: "One of the Mayor's most important roles is leadership. As a consequence, **the delivery of much of the vision set out in the LES will depend upon the indirect influence of the Mayor in this leadership capacity**, through his ability to bring together stakeholders to deliver initiatives and programmes identified in the LES that would benefit Londoners and London's environment." (IIA p5 para 2.3.1.3)

During the recent TCPA Seminar on the Mayor's Vision on the Natural environment and Healthy Communities (14 November 2017), participants observed that on the environment there is a general lack of will and action by the Government, lack of resources among boroughs and at best weak attention to environmental policies either in practice or in Local Plans. This vacuum makes it all the more important that the Mayor should seize the initiative by setting forward a strategy that embodies determination, a definite course of action, maximising the powers and resources that are available to the Mayor and the GLA. For

example, a precept could be levied to support the necessary quality and quantity of green infrastructure required for present and future London.

In addition to this state of affairs should be added the understanding that best practical means and other important environmental principles are handed down from the Treaty of Lisbon (and not from EU Regulations) and will not necessarily be transposed automatically into UK law. This would make it all the important that LES and associated strategies are instrumental and directional on the protection and enhancement of the environment.

At the recent Just Space roundtable meeting (13 November 2017) of community group representatives to reflect on this submission, it was generally held that there should have been clearly set out the functions and powers of the Mayor, the GLA and bodies etc. that are to implement this strategy. However, we do know that the Mayor has statutory powers under section 30 of the Greater London Authority Act 1999 (as amended), acting on behalf of the Authority, to do anything he considers will promote the improvement of the environment in Greater London; and he is reminded of this in the Mayoral Decisions documents (in the "Legal Comments" section) that he signs. Just Space urges the Mayor to make the most of his powers, capabilities and abilities to fulfil the promises and commitments made in his manifesto and the 'direction of travel', A City for All Londoners, to make "the city healthy, resilient and fair, and making it resource efficient, low carbon and green".

The draft LES – its general approach

This meeting also viewed the draft strategy as being not user friendly (notwithstanding the infographics), lengthy – reputedly 90,000 words long, but lacking in ambition, with woolly or loose policy and proposals language, and having distant time scales without near and intermediate targets. Inconsistencies were found between the objectives of this strategy and Mayoral decisions to initially abandon funding tree planting and then to support the road building project of the Silvertown Tunnel. That there is an "old model of parks and nature reserves" that is not feasible to replicate extensively (Proposal 9.2.1a – promoting more quiet spaces p360) was found to be odds with the importance attached to protecting the areas that already exist, remedying the areas of deficiency (the Challenge Map) and with the continuing popular support for that 'model'. The meeting was concerned that the people of London would be less willing to get involved in supporting and helping to implement the strategy. How change for the better can happen now was seen as a significant lever for action by Londoners, and so should be embedded into LES.

Making London a Blue Green City

Given the interactions between different aspects of the environment, an integrated and holistic approach is needed to tackle the existing and predicted economic and population growth of London. The internationally agreed principle of sustainable development stresses that we "achieve our goals of living within environmental limits and a just society, and we will do it by means of sustainable economy, good governance, and sound science". Yet, we are not "living within environmental limits". London is not on track to meet even existing targets to control climate-changing emissions and is blighted by illegal levels of air pollution. Policies have not proved adequate to address the deficiency of green space, the erosion of habitat and the protection of existing green space from commercialisation and development; or that the food we consume can be healthy, affordable and sustainable.

We have seen serious exploitation of London's waterways, overshadowed by proliferating lines of buildings, and the absence of sustainable solutions for London's water-related environmental problems.

The Mayor should make London a **Blue Green City***, by placing value on the connection and interaction between London's blue and green assets. The Boroughs, the voluntary and community sector and the private sector, including water companies, should be brought together to: build public awareness of the importance of environmental targets such as on climate change, air pollution, protecting nature and sustainable use of water resources; and provide for community involvement in the formulation and implementation of policies and programmes to ensure environmental targets are actually achieved by the dates required.

*The Blue Green City is common in cities of the USA. Newcastle has been selected as a demonstration city in the UK by the Blue Green Cities Research Team.

Monitoring

Proposals for monitoring within the draft LES revolve around “the more targeted interventions” (IIA p90 para 7.2.1.2) for various topic areas of the environment – namely, air quality, building energy efficiency, biodiversity, GHG, climate change mitigations. However, the IIA (par 7.2.1.3) promises that a framework will emerge post adoption. Presumably, this will include a comprehensive set of monitoring indicators to measure and evaluate progress towards the targets or improvements against the challenges identified in the strategy. Nevertheless it is conventional practice for the tests of appraisal and evaluation and the indicators to be identified within the ‘covers’ of a strategy. Clearly further work here is required before adoption is proposed. At least a table should be incorporated into the strategy showing the objectives and targets, the indicators, signposting how and where they are presented so that users can find the reports on any adverse effects during implementation.

Reviewing the progress of the strategy is not only an issue for compliance with the SEA Regulations (IIA para 7.2.1.1) but one of wider democratic accountability whereby Londoners can participate in the process, enabled by ready and easy access to information. And on this point, Just Space asks that in addition to the (quantitative) indicators, which could usefully include measuring changes in public/business opinion, awareness etc., that there be qualitative assessments undertaken by community and environmental groups. There is an important role for communities in monitoring, safeguarding and enhancing the environment.

Concern has been expressed about two Proposals on monitoring. Proposal 4.1.2b (p68) on air quality monitoring may well be intended to be supportive of community monitoring, but it is a strongly held view that this should not close down options or retard community action, for example, through the accreditation process. Reassurance and clarity would be welcomed.

Proposal 5.2.1d (p171) for “cost effective monitoring framework to ensure important natural environment data is collected consistently to inform future decision making”. The text goes on to say that: “Volunteers and citizen scientists also contribute to the collection of this data. The result is a disparate approach that does not provide a strategic view of the state of London’s natural environment.” Whilst the principle of being ‘cost effective’ is accepted to a degree, it must be remembered that the returns to London and its environment, as against the outlays, may be considerable if degradation, harm and other costs are stopped through effective monitoring. The Just Space roundtable meeting (13 November 2017) asked that the contribution of volunteers and citizen scientists be valued, for it not only generates data, increasingly sophisticated and ‘scientific’, across many parts of London at a fine grained scale, but also generates senses of involvement, empowerment and collaboration. A more significant role for Londoners in monitoring and in a participatory democracy, and also for that matter in environmental projects, is something that would align with the Mayor’s ambition for “active citizenship” – “active participation in community and civic life” (A City for All Londoners p73).

Indicators

Just Space, in its meetings with London Plan planners, included a short presentation on suggested ‘Indicators for Monitoring and Implementation’, which whilst about the London Plan KPIs, did quote the observation that “monitoring is also undertaken by the London Sustainable Development Commission” (from London Plan IIA Scoping Report para 7.5.4) and that some of the environmental indicators, particularly the more nuanced ones, being adopted by the LSDC, together with its monitoring, would benefit from a higher profile. It is somewhat surprising that no reference to the LSDC and its monitoring could be found in the draft LES IIA Full Report.

Just Space prepared its publication “[Towards a Community-Led plan for London – Policy directions and proposals](#)” in 2016 following a series of open access conferences and

working groups to which over eighty community, environmental and voluntary organisations participated. Whilst targeted for the London Plan, it includes some suggestions for indicators (pp65-66) which are directly relevant for the environment. These are included here below* for the sake of completeness in communicating the Just Space consensus, but it is recognised that there ought to be further deliberation on the choice of the most suitable indicators. Just Space asks that communities be actively involved in their formulation and operation.

*“C. Environment: Carbon emissions in relation to the minimum limit set to avoid dangerous climate change (using Defra data); similarly for air quality.

I. Sustainability of resource use (for example capacity of renewable energy equipment installed; amount of waste generated that is not recycled).

J. Environmentally-damaging travel and transport generated by economic activity (for example number, distance and cost of work-trips, deliveries, air-travel). ”

Process/Next Steps Issue

It is understood that the final LES is to be prepared for spring 2018 (ADD2170 LES – Consultation Response Analysis Contract Decision 2 November 2017), possibly close to the close of consultation on the new London Plan on 2 March 2018. Such early finalisation of the LES could be held to be premature and injurious to the iterative process whereby the Mayor’s principal strategies inform and refine one another as they are exposed to administrative and public scrutiny. However, the draft LES is less deterministic and prescriptive than, say the draft Mayor’s Transport Strategy which in presenting a certain determined view of the trajectory for London’s future, effectively undermines the London Plan consultation process, negating the authenticity of its exploration of alternatives and the possibility of revisions (as argued in the Just Space response to the consultation on the MTS). Nevertheless, the Mayor should reflect carefully on whether any finalising of LES would pre-empt the proper plan-making process and increase the risk of exposing the strategy and plan to judicial review.

Chapters 4 to 11

Origin of the responses

Just Space prepared its publication “[Towards a Community-Led plan for London – Policy directions and proposals](#)” in 2016 following a series of open access conferences and working groups to which over eighty community, environmental and voluntary organisations participated. The responses appended elsewhere are rewrites of that published assemblage of views and propositions refined by subsequent discussions and attending various workshops on the draft LES.

CHAPTER 4 Air Quality

Presently: There is close alignment with the Mayor on the issues around air pollution. Nearly 10,000 Londoners die early every year due to air pollution (including from fine particles and the toxic gas Nitrogen Dioxide or NO2 making it the biggest environmental cause of premature death). The capital suffers under illegal levels of NO2 – EU legal limits set to protect health should have been met in 2010, or 2015 at the very latest. Limits now have to be met in the shortest possible time, following the UK Supreme Court ruling, and all possible measures must now be taken so that our air is cleaned up much sooner. Road traffic is the biggest problem.

What Needs To Be Done:

A. New schools, hospitals or care homes should not be built in air pollution hotspots and schools near busy roads should be fitted with effective air filtration systems — as recommended by the House of Commons Environmental Audit Committee.

B. All of London must be made to meet EU legal limits for NO₂ by 2020 at the latest — this is the date the rest of the UK will have to comply by, and Londoners should not have to suffer dangerous levels of air pollution for a further 5 years after the rest of the country.

C. London must set itself on a path to meet the World Health Organisation recommended level for PM₁₀ air pollutants. New limits for finer particles PM_{2.5} will be needed. Tackle construction machinery and river/canal boats that emit high levels of pollutants.

D. Reduce the need for people to have to travel, promote and designate by way routes that have lower levels of pollution for walkers and cyclists, cut road traffic levels and ensure road vehicles are clean (which should mean phasing out diesel altogether), and this means a joined up approach to improving the environment, transport and infrastructure with: strong road traffic reduction targets and avoiding traffic generating transport schemes; fewer vehicles and cleaner vehicles; implementing London wide road user charging; and strengthening Low Emission requirements to include cars.

An important driver of the Mayor's strategies should be to meet air quality targets. This requires greater regulation and restriction of vehicular traffic in Central London and elsewhere with the phasing out and ultimate banning of all diesel (including buses and water transport) and a London-wide Ultra Low Emission Zone (ULEZ). It should be remembered that manufacturers' compliance with Euro standards is held in disrepute. But climate change remains an issue even if the air quality crisis was solved. The Road Map to Zero Emission Road Transport should be amended accordingly and should be delivered through an Implementation Action Strategy setting out the measures that are determined to be necessary to fulfil this objective. Inconsistencies found between the objectives of this strategy and Mayoral decision to support the road building project of the Silvertown Tunnel should be remedied by the cessation of such road building schemes.

Road Traffic Reduction Target Setting would guide policy and proposals by providing benchmarks to measure progress, determine the need to strengthen or further resource implementation and require other agencies and authorities to fulfil their responsibilities in delivering an integrated transport strategy. Road user charging, London wide, would change travel behaviour and tackle congestion and pollution. (It is still in the current London Plan 2015—para 6.39A). This would create a fairer share of space for cyclists and buses, with revenue used to support sufficient, reliable, safe, affordable and accessible public transport. However, it would need to be applied in a fair and proportionate way and could operate in a variety of ways, such as higher charges during peak periods or for certain vehicle types etc.

Implementation:

The Mayor must carry these proposals forward and shape his other strategies and programmes accordingly, particularly the London Plan and Transport Strategy.

CHAPTER 5 Green Infrastructure

Green Space and Infrastructure

Presently: Policies have not proved adequate to address the deficiency of green space, the erosion of habitat and the protection of existing green space from commercialisation and development; or that the food we consume can be healthy, affordable and sustainable.

Note that LES is surprisingly quiet on food growing in the environment. Proposals 5.1.1d (p152) and 5.1.1f (p157) do mention the possibilities of including space for food growing in green streets and buildings, including green roofs, green walls and sustainable drainage, but

only “might include...”. And recognition is paid to greater community involvement in green spaces and the natural environment through food growing initiatives. Elsewhere food is dealt with in terms of being part of London’s waste streams. This, incidentally, should be corrected into seeing food ‘waste’ as a resource to be returned to the natural cycle of the environment in an environmentally friendly way. Food ‘waste’ could be reduced (Policy 7.1.1 p272) by facilitating Londoners to grow their own food, for food that is the product of one’s own labours can be harvested as and when required and is less likely to go to waste if there are sharing and distributive mechanisms in place. Therefore, Just Space requests that this near silence in LES be remedied even if there is a separate ‘Mayoral food policy’ document.

Accordingly, a submission is made elsewhere in the Just space response under the section: **Community Food Growing and Food Production.**

Note also that LES is quiet on soil conservation and protection which is particularly important for food growing.

What Needs to be Done:

Implement policies, proposals and minimum standards which will effectively protect and enhance the amenity, recreational and nature value of green space and remedy deficiencies in quantity, quality and accessibility, recognising their importance for nature, health and well-being and for amenity etc.:

A. Green space categorised as brownfield land (including communal green space on housing estates) needs to be protected, especially where there is a deficiency of green space. These should be designated in Local Plans and registered as assets of community value. That there is an “old model of parks and nature reserves” that is not feasible to replicate extensively (Proposal 9.2.1a – promoting more quiet spaces p360) is at odds with the importance attached to protecting the areas that already exist, remedying the areas of deficiency (the Challenge Map) and with the continuing popular support for that ‘model’.

B. Green space intersects with water, food growing, biodiversity and makes a contribution to reducing air pollution. Deficiencies in all functions of green space must be addressed.

C. An implementation strategy to ensure every Londoner lives within 400 metres (10 minutes walk) of each type of green space, as described in the open space hierarchy. This is particularly important in areas of deficiency and areas of high density living.

D. To counter the trend of passing public land to private ownership for public use, any Mayoral policy or proposal needs to refer to publically owned as well as publically accessible space.

E. Recognise that green space also includes common land (commons) held in trust for future generations.

F. Ensure sufficient resources for the maintenance of green spaces; encourage and support friends of parks groups that provide stewardship, not only of parks but a range of community facilities and infrastructure.

Biodiversity/Looking After Nature

Presently: Habitats and species – areas, numbers and populations are declining.

What Needs to be Done:

Counter any decline in species and habitat, with strengthened policies that improve designated habitat areas; enhance, increase and create new habitats; and make adaptations to the built environment so that everyone has access to nature. To achieve this, the Mayor will review his Biodiversity Strategy 2005 which is out of date and require:

A. A joined up approach to green corridors, so that they are also routes for nature.

B. Protection of the habitat that nature relies on (eg hedges, woods and wild meadows) and increase pollinated friendly planting including bee-keeping. Biodiversity offsetting schemes

should not be supported as nature does not work on a like for like basis. Any such proposal as a matter of last resort must at least require more than is lost to achieve a net gain in biodiversity.

C. New build and existing buildings requiring change of use should have green / brown roofs for wildlife, water retention and insulation.

D. TfL land should be used for habitat, as previously with the Capital Bee Line.

E. Both protect and plant trees as an essential part of re-greening the city. They provide multiple benefits, such as drainage, capturing air pollutants and cooling and shading.

Blue Ribbon Network

Presently: London's Blue Ribbon Network is the Thames with its tributaries, the canal network and open water spaces such as docks, reservoirs, marshes and lakes. It is an important resource for London — for transport and commerce, leisure and recreation, as well as biodiversity and as a principal component of London's public realm. Note that the London Plan provides for the Blue Ribbon Network (BRN) with policies that reflect its strategic importance and ensures its future protection and enhancement.

What Needs to be Done:

A. Through the BRN policies the Mayor will designate the Blue Ribbon Network as 'open space' giving the waterways the status, as well as protection, of a park. River restoration is a potentially significant improvement that can have a multiple of benefits, such as amenity or flood risk reduction. Because rivers are often shared by local boroughs, the Mayor is best placed to orchestrate and resource a unified approach to their restoration.

B. Promoting the functional uses by passenger, ferry and freight transport and protecting it from encroachment will help sustain the BRN for recreation and amenity. Development in the vicinity of the waterside should establish and reflect a relationship with the waterways.

Implementation:

The Mayor must carry these proposals forward and shape his other strategies and programmes accordingly, particularly the London Plan, Health Inequalities and Transport Strategy.

CHAPTER 6 Climate Change Mitigation and Energy

Climate Change Targets

Presently: GHGs may have been falling, but not enough to keep on track to meet climate change targets.

What Needs to be Done:

The Mayor must strengthen the Climate Change targets after the Paris agreement December 2015 and the aspiration for 1.5 degree limit to the global average temperature rise. This requires changes to energy generation, energy efficiency, and targets for renewable energy in order to achieve:

A. At least 80% cut in emissions by 2030 to have a strong chance to keep within the 2 degrees limit to global temperature rise based on 1990 levels.

B. Zero carbon new homes standard to be kept in London.

C. Solar panels on all new buildings and existing and new school buildings.

D. Increase decentralized renewables ten-fold by 2025.

E. 100% renewables and 100% zero carbon by 2050.

F. The Mayor and his family of functional bodies should use their property portfolio for extensive renewable energy production and local distribution.

Energy Supply and Infrastructure, including Tackling Fuel Poverty

Presently: Significant levels of fuel poverty and inefficient energy efficiency, coupled with fossil fuel based supplies and suppliers distant from consumers. There are many winter deaths, especially in hard winters – many more than bike deaths.

What Needs to be Done:

A shift is needed in London's energy infrastructure, to meet carbon emission targets, move away from fossil fuels and nuclear dependence and tackle fuel poverty, by:

A. To create an ambitious new fully licensed not-for-profit publicly owned energy supply-company owned by London public bodies that is dedicated to cheaper, cleaner and more democratic energy. (See <http://switchedonlondon.org.uk/>). One that is more interventionist and can take meaningful action on fuel poverty, democratically run by and in the interests of Londoners, not as light-weight as presently proposed.

— This will open up space for discussion on energy strategy and turn energy supply into an issue on which the Mayor has some control, instead of being “beyond the Mayor's control”.

B. A major retrofitting programme for existing homes, with those in fuel poverty having their homes insulated first, and

C. The introduction of London wide minimum energy efficiency standards in private rented homes, of Energy Performance Certificate C, by 2025.

D. All efforts should be made for pension fund divestment from fossil fuels and reinvestment in renewables. The GLA should implement full and immediate divestment from all fossil fuel companies.

E. Future proofing by recognising that the supply of energy for cooling, and the supply of cooling itself, will become increasingly important over time. Similarly, the supply of energy for electric vehicles will change the dynamics of energy generation and consumption. There are increasing prospects of vehicle batteries acting as storage for non-continuous renewable energy, for example.

These are further elaborated in the following sections on **Caring for Existing Homes** and on **Quality for New Homes**.

Embodied Carbon:

The LES should be comprehensive on the environment. It should recognise and tackle 'environmental' dimensions that are seemingly matters that are the province of other strategies and programmes. The role of reducing whole life building emissions (embodied carbon) as explored by Proposal 6.1.4c (p235) is a start. But whilst the contribution to resource efficiency is welcomed, this does not extend to the factoring in of embedded carbon beyond materials to include operation/functioning. A wider application of embodied carbon should be sought to ensure a resource efficient London and its developments over whole life times.

LES should have greater referencing to 'embodied carbon', with an aim of increasing efficiency in/ minimising resource use, and as a 'tool' to measure the need to and effectiveness of carbon reduction programmes across large areas and sectors. Embodied carbon does not yet appear in the London Plan, but there is an imperative to go beyond current policy concepts and targets in order to deliver the exemplary development that is needed for a London under resource and environmental pressures. It is appropriate to think, for example, beyond zero carbon buildings and plan for buildings that are carbon sinks. Again, although particularly challenging, would be an implementation plan for the

reorganising of London's activities and developments to minimise embodied carbon that would truly realise a zero carbon London. But see under the response to Chapter 10 'Low Carbon Circular Economy' the Just Space proposal for a '**Green and Localised Economy**'.

(At time of writing) Note that six local authorities including Brighton and Hove require embodied carbon estimates. Requirements for embodied carbon assessments in both the Netherlands and Germany are soon to be introduced in other countries. Embodied carbon is likely to be an indicator in EU harmonised sustainability assessment framework and the Embodied Carbon Taskforce has been lobbying for the inclusion of embodied carbon abatement as an Allowable Solution.

Caring for Existing Homes

Presently: It is essential to maintain and refurbish existing homes, not knock them down. Given the material loss of social housing, it should be a high priority that existing social rented homes are protected and this requires changes to the current model of estate regeneration. Demolition of homes is among the most contentious issues in urban regeneration. [Just Space](#) and the [London Tenants Federation](#) commissioned the Engineering Exchange and the [UCL Urban Laboratory](#) to review the technical evidence for demolition or refurbishment of social housing in London. The review found that housing refurbishment is often better than demolition and reconstruction, when considering social, environmental and energy factors. The series of resources includes life cycle evidence review and a Carbon (embodied energy) Fact Sheet:
<http://www.engineering.ucl.ac.uk/engineering-exchange/demolition-refurbishment-social-housing/>

Of particular importance are high levels of fuel poverty; the UK has one of the least energy-efficient housing stocks in Western Europe. The solution is for the Mayor to designate home energy efficiency as an infrastructure priority. Retrofitting on a large scale would provide jobs and consequent economic benefit, and reduce energy consumption and environmental degradation.

What Needs to be Done:

[Following list has been edited to focus on the most environmentally relevant]

A. The Mayor and the boroughs will support maintenance and enhancement of the condition and quality of London's existing homes to ensure that new homes delivered are additional to existing stock rather than replacements. This will include designating energy efficiency as an infrastructure priority and using infrastructure funds to deliver stable, long term investment to implement a locally-led programme for the upgrade of all existing London homes to B and C on an Energy Performance Certificate.

B. Boroughs should develop policies and proposals to reduce environmental impact, particularly lifetime and embodied carbon emissions, through the sustainable retrofitting of existing homes. In particular they should:

- Prioritise adaptations to the homes of older residents.
- Prioritise fuel-poor and vulnerable households .
- Identify synergies between new developments and existing homes.
- Though retrofitting of energy and water efficiency measures, decentralised energy and renewable energy options.
- Make the link with public health programmes (for example, a boiler on prescription programme for those most vulnerable).
- Include minimum energy efficiency standards as a condition of licensing in the private rented sector.
- Encourage energy rights initiatives and community based energy projects.

C. Refurbishment options for existing council or housing association estates should include proposals to retain, enhance or deliver green and garden spaces, play and youth provision and community space and buildings.

E. Proposed regeneration of council or housing association estates should require comprehensive, independent analysis of social, environmental (including embodied carbon) and economic benefits of all proposed options and a ballot of tenants and leaseholders. Options should always include refurbishment.

Quality of New Homes

Presently: New homes are not being delivered with full consideration of longevity and durability of construction (c.f. embodied energy). The health of residents should guide design, avoiding the negative impact of dark homes and outside spaces and providing sufficient communal areas. The GLA has permitted developments far above levels agreed in the density matrix, yet there has been no analysis of the effects on health and wellbeing of people living in them or affected by them. Attempts to reduce standards of sun and day-lighting for development will have knock-on effects on energy consumption and amenity spaces that need to be carefully analysed.

The emphasis placed on access to public transport within the density matrix brings with it the danger that we lose sight of the higher goal whereby people can satisfy their daily needs of work, shopping and recreation within walking distance and only have to rely on mechanised transport for more occasional needs — the ‘walkable city’ concept which, among other things, is more energy efficient.

Density levels can be optimised to help achieve the zero carbon city ,but they should be sensitive to the needs of all communities, and all communities, including all household sizes and incomes, must have the facility to live in all parts of London.

What Needs to be Done:

[Following list has been edited to focus the most environmentally relevant]

A. New homes should be built to last a minimum of 125 years. The design and construction should ensure adaptability so that retrofitting and rearrangement of internal spaces can occur.

B. New homes should be energy positive.

D. Communal meeting spaces and green and play space with good natural light should be integral to the design of new housing blocks and estates.

E. A new more sophisticated density matrix that combines housing, social and community infrastructure should be developed. This will take into account household income, financial accessibility to transport, proximity of accessible (both in a physical and financial sense) sport and leisure, community, youth and safe play facilities, levels of overcrowding and preservation of local character.

Implementation:

The Mayor must carry these proposals forward and shape his other strategies and programmes accordingly, particularly the London Plan, Housing, Health Inequalities and Economic Development Strategies.

Chapter 7 Waste

Presently: Only about half of London’s waste is recycled and land fill options are closing. Litter abounds.

What Needs to be Done:

Consistency in municipal waste collections is to be welcomed, but people still need to change their attitudes and recycle more. There is a role here for peer to peer encouragement

of behaviour change through empowered and supported community groups. Similar efforts could be applied to food waste reduction. The provision of incentives (e.g. reduced fees or Council Tax) as well as persuasion should be considered. Integrating the means to dispose waste effectively and properly, with a focus on recycling design of products and packaging is crucial. This is especially important for flats and businesses. Business waste needs to adopt high levels of recycling.

Waste from everyday living, as exemplified by non-recyclable coffee cups or plastic bottles, has now joined the concerns about waste for community and environmental groups. These now look to Scotland's zero waste and plastic bottle sur-charging for inspiration. The Mayor should do likewise.

There is a tension between the benefit of increasing recycling rates and the effort that requires. Again, there is a tension between maximising recycling rates and achieving a circular economy wherein products and materials are reused again and again. The Mayor should clarify how these tensions can be overcome through LES.

Concerns have been expressed over the seemingly unregulated nature of construction waste reuse and that no monitoring is undertaken over the disposal of hazardous materials such as asbestos. SME builders and home improvers do not seem to have easy access to appropriate construction waste management facilities.

Food 'waste' is a resource to be returned to the natural cycle of the environment in an environmentally friendly way. Food 'waste' could be reduced (Policy 7.1.1 p272) by facilitating Londoners to grow their own food, for food that is the product of one's own labours that can be harvested as and when required and is less likely to go to waste if there are sharing and distributive mechanisms in place. This is elaborated more in the '**Community Food Growing and Food Production**' addition to this response.

A moratorium on new incinerators is needed. Waste management companies are still interested in pursuing such 'energy from waste' plants on the grounds that they contribute to sustainability. Underpinning their justification for energy from waste is a fundamental misunderstanding of resource use and the Circular Economy concept. A circular economy is one that minimises the use of materials and minimises waste by using and re-using materials efficiently. (See London Assembly Environment Committee Growing, Growing, Gone Report, March 2016). Energy from waste is next only to landfill at the lower, least sustainable, end of the waste hierarchy (Waste Management Plan for England). The strategy should make it clear that waste is to be driven up the waste management hierarchy.

Implementation:

The Mayor must carry these proposals forward and shape his other strategies and programmes accordingly, particularly the London Plan, Housing, and Economic Development Strategies.

Chapter 8 Adapting to Climate Change

London's Water

Presently: London is both a water-scarce area and an area which is subject to flooding. Extensive and continuing land cover by water-impermeable materials stresses existing drainage; this has been compounded by changes in rainfall, higher volumes falling in shorter time. Flooding in London has become a more regular occurrence. This leads to overflowing in the dual drainage system where high flows of surface drainage mixes with sewage flows and to consequent sewage discharge in to the River Thames. The construction of the Tideway Tunnel is recognised as a partial solution.

Covering of permeable surfaces and intensification of rainfall have contributed to the growing flooding problem. Densification of London's housing, by eroding existing open space, including brownfield space, is also contributing to the future problem of water scarcity. Again, rainfall intensification, short, intense showers, leads to run-off rather than retention. London

lies in a water scarce area with similar rainfall volumes to parts of North Africa. Rainfall, here, is half of that falling in the driest areas of Wales.

What Needs to be Done:

The 'Blue Green City' will ensure that water management plans provide the maximum green infrastructure benefits and that green infrastructure contributes to flood risk management. Key elements will include:

- Sustainable urban drainage systems
- Stopping the leaks
- Increase in river and canal transport for passengers and freight, including waste and construction materials

An important tool for achieving this cross-cutting policy approach is Integrated Water Resources Management which understands that water resources are an integral component of the ecosystem, a natural resource, and a social and economic good. Proposal 8.2.1c should be rolled out to manage risk and promote good planning of environmental assets.

Sustainable Urban Drainage System (SuDS)

Presently: There are many proven methods of ameliorating surface flooding: street tree planting to soak up rainwater, green roofs and walls, permeable pavement and road surfacing, green spaces that rainwater can sink into — rain gardens, swales to channel run-off and so on. Similarly, grey water could be harvested on large roof areas and technology for harvesting, filtering and purification exists. Ideally this could be utilized in nearby housing, for toilet flushing, garden watering, car cleaning etc. Yet, these techniques are rarely used.

What Needs to be Done:

A. The Mayor will produce SuDS Guidance on practical measures and provide a knowledge bank for developers and planners, alongside programmes to achieve community involvement in their implementation and maintenance.

B. The Mayor will make the case for sustainable drainage and rainwater harvesting to be a mandatory for water companies and new development, and will explore retrofitting for existing development.

Implementation:

The Mayor must carry these proposals forward and shape his other strategies and programmes accordingly, particularly the London Plan, Housing, and Economic Development Strategies.

Chapter 9 Ambient Noise

Presently: Construction noise can be quite problematical and the intensification of airports (without expansion) and the tube and rail networks can generate noise nuisance for many Londoners.

What Needs to be Done:

With the pressure on local Environmental Health Departments due to reduced staffing and resourcing, the Mayor should ensure that all of his responsibilities and activities assist in preventing the emergence of noise nuisances and their suppression. For example, London wide 'noise' guidelines can be formulated to which 'considerate contractors' and transport operators can sign up to. The Mayor has power and opportunities through the planning system to regulate development. Citizen Science can be actively supported to provide the evidence that local communities need to effectively challenge noise nuisances.

Implementation:

The Mayor must carry these proposals forward and shape his other strategies and programmes accordingly.

Chapter 10 Transition to a Low Carbon Circular Economy

Presently: A wider understanding of the circular economy needs to be further developed and integrated into policy and practice. It is presently pitched and defined (as in the Glossary p386) as an economic model, but whilst this may offer attractions to businesses and those promoting economic growth, this is not its full potential. West London businesses were introduced to the concept by the OPDC, liked it, but did not understand how it can be introduced and brought up to scale. Transition will not happen unless the practicalities are understood and easy entry points to change are available.

What Needs to be Done:

Just Space considers that the route map to a more sharing, lower carbon intensity lifestyle and economy is available to London through a '**Green and Localised Economy**'.

A Green and Localised Economy

To ensure that economic development works within environmental limits the Mayor needs to mainstream the principles of a green, circular and localised economy which would ensure better use of resources and a more dispersed pattern of activities, building on London's thriving local economies.

It will be essential to ensure that all enterprises in London have the means to become greener and to take part in a circular economy, minimising their waste and energy consumption and promoting reusing, repairing and recycling. Energy production at the ultra-local level could be an integral part of a more secure and resilient energy system and instrumental in developing sustainable local economies more generally.

The role of the public sector will be extremely important in driving innovation, research and development. The GLA and London's public institutions should plan for and invest in the future of activities with low environmental impact, especially aiming to increase the productivity of low wage sectors.

Car travel, long commutes and long-distance deliveries can be reduced by ensuring employment and amenities are available and accessible across London's neighbourhoods and that businesses are inter-connected. A more localised economy will move away from the current over-reliance on the Central Activities Zone and the town centre hierarchy, towards a more poly-centric distribution of local centres that often include high streets, shopping parades and street markets. These provide local jobs, low cost workspace and a variety of products and services, as well as essential social infrastructure.

More than two thirds of London's jobs are located outside the Central Activities Zone (CAZ) and London's 600 high streets represent some of the most important spaces in the city for the local economy; they have proved to be resilient over the centuries, adapting as circumstances change. Trading in street markets and covered markets, the oldest form of retail trading is increasingly under threat. Many of our markets are especially valuable to low-income communities and the low cost of pitches and stalls support entrepreneurship and family businesses. A rich mix of economic activity contributes to increased wellbeing, security and support especially for those who are most disadvantaged. Local jobs are particularly important for those with child-care or other caring responsibilities especially when part-time work is scarce.

However, the historic diffusion of business spaces across London in most neighbourhoods and districts is disappearing due to the scale, density and nature of residential and current forms of "mixed-use" development. The pressure on local authorities to sell off public assets

including libraries, markets, community centres and leisure centres has accelerated the loss of social infrastructure, employment and affordable workspace of all types.

All This Requires:

[This has not been edited in order to convey an appreciation of the cross cutting and holistic approach that is necessary, one which the Mayor is well placed to realise. But there is an appreciation that implementation goes beyond LES into other strategies, particularly Transport, Economic Development and the London Plan.]

- A.** Encourage changes in consumption and production to achieve a sharing and circular economy, setting targets to reduce all types of waste, supporting reuse, repairing and recycling activities (for example through networks connecting surplus food, building materials, furniture, IT equipment etc. with people in need). Ensure support and funding schemes are easily accessible to SMEs, social enterprises and local community groups for education and training programmes (for example, waste management, resource-efficiency, accessing local supply chains).
- B.** Raise the environmental performance of the building stock and reliance on non-renewable energy sources (see response above to Chapter 5 Climate Change Mitigation and Energy) and re-configure settlement and urban patterns to reduce the need for travel.
- C.** Protect London's poly-centric economy by supporting development which does not compromise the economy and diversity of local high streets, town centres of all scales, local shopping parades, markets and shopping centres, particularly outside the Central Activities Zone.
- D.** Support development which fosters Lifetime Neighbourhood principles (see Implementation section of Just Space's [Towards a Community-Led plan for London – Policy directions and proposals](#)), with a focus on creating well-paid and secure local jobs and access to local amenities and services affordable to everyone.
- E.** Planning applications for major new development will take into account the need for new workspace to accommodate a mix of economic activities in all sectors, including community and voluntary organisations, social enterprises, education, play, religious, health and care facilities.
- F.** Recognise and protect street and covered markets as a) a source of healthy and cheap food and other goods b) a social benefit c) a source of independent business and local supply d) providing local employment e) an opportunity for start-up businesses. Local authorities should seek to retain control of management and rent-setting and must consult with traders and customers on future proposals.

Implementation:

The Mayor must carry these proposals forward and shape his other strategies and programmes accordingly, particularly the London Plan, Housing, Health Inequalities and Economic Development Strategies.

Chapter 11 GLA group operations – leading by example

The role and contribution that the GLA group can make is recognised and referenced in places in this response to the draft LES.

Other Comments

Community Food Growing and Food Production

Presently: This topic is not really explored in the draft LES commensurate with its potential for purposeful and rewarding contributions to a better environment, society and London. The proposals in Just Space's "[Towards a Community-Led plan for London – Policy directions and proposals](#)" have reached a very detailed level, a reflection of the creativity of the Food Panel that met at City Hall at one of the open Community Conferences on 4th February 2016 and the many meetings of a working group that included Community Food Growers Network, Sustain, Women's Environmental Network and the Federation of City Farms & Community Gardens.

[The following paragraph is noted under the response on Green Infrastructure, but is repeated here to ensure that the representations on food growing are in one place].
LES is surprisingly quiet on food growing in the environment. Proposals 5.1.1d (p152) and 5.1.1f (p157) do mention the possibilities of including space for food growing in green streets and buildings, including green roofs, green walls and sustainable drainage, but only "might include...". And recognition is paid to greater community involvement in green spaces and the natural environment through food growing initiatives. Elsewhere food is dealt with in terms of being part of London's waste streams. This, incidentally, should be corrected into seeing food 'waste' as a resource to be returned to the natural cycle of the environment in an environmentally friendly way. Food 'waste' could be reduced (Policy 7.1.1 p272) by facilitating Londoners to grow their own food, for food that is the product of one's own labours that can be harvested as and when required and is less likely to go to waste if there are sharing and distributive mechanisms in place. Therefore, Just Space requests that this near silence in LES be remedied even if there are separate 'Mayoral food strategy' initiatives. LES should be comprehensive on the environment and shape Mayor's other strategies and programmes, including the application of resources, funding and property assets.

What Needs to be Done:

The creation and sustaining of a just food system that allows everyone access to good food and food growing spaces. It is also about granting growers long tenure-ships, not just meanwhile spaces. Food is inter-connected with London's other needs, for instance the need for housing. The proposal is to have food growing space in all new housing developments. There is also an economic need to train people for new jobs and shorten the food mileage and food chain.

At the Strategic Level

A. Land will be made available and protected to support community food growing and food production enterprises in order to meet the longer term goal of achieving a resilient food system and providing fresh, nutritious food for Londoners. This will contribute to enterprise, job-creation, training schemes, and London's efforts to address climate change.

There will be an increasing amount of sustainable and locally produced food consumed in and around London, through development of strategic partnerships between land owners, and urban, peri-urban and rural food growing projects. 1 [see references at foot of this section]

Food growing and production and distribution are closely related to housing, health, the economy and the environment. It is essential to adopt an approach that is intersectional, participatory and inclusive for consumers, producers and distributors. Food production provides employment and training and contributes to sustainable economic development.

B. The amount of land in use for growing food will be increased in all urban communities in both inner and outer London, via:

- Integration of food growing space as a requirement in all new housing developments with utilisation of green roof methods and potential for training and enterprise opportunities.
- Partnership between the GLA, Sustain, Local Authorities and established food production enterprises to identify food production sites on GLA and local authority-owned land for new entrants in the sector. This will use best practice models between local authorities and food growing enterprises.
- Career-long agricultural tenure-ships offered by local authorities and GLA for food production sites, to provide sufficient time to develop financial viability, benefits of biodiversity and community development, and soil replenishment through organic food production.

C. Local Authorities to foster a new generation of London food producers to work in a globally innovative urban food system by funding and supporting:

- Accredited training in organic food production.
- Paid work placements — apprenticeships and shorter-term placements (e.g. 6 months) that support (young) people to further develop skills in the work environment and provide sustainable employment opportunities.
- Associated “next steps” training — e.g. enterprise training, community development training.

D. The Mayor will promote and enhance the London Food Strategy. This will be implemented through the London Food Board, which will include representatives from London’s community food growing and sustainable food production sector.

At the Local Level

A. GLA and borough councils to integrate food production into strategic assessments, funding streams and new developments in recognition of the various benefits of the sector and positive land use activity including; access to green space, mental health, enterprise generation, training, personal development, community well-being, access to fresh and healthy food, reduction of carbon footprint in food industry.

B. Local Authorities must identify and safeguard land and Infrastructure for commercial food production and community gardening, including allotments, parks, orchards, schools and large commercial small scale glass houses.

Local Authorities to make accessible a public register of available land e.g. park land, housing estates, brownfield sites or temporarily available sites and to administer a list of interested parties looking for land for production and marketing of food for London. 2

C. Food growing and food production should be considered as a priority use for public land that is underused or vacant, particularly where not suitable for housing, on a long term basis under the Community Right to Reclaim Land, (Localism Act 2011), or where not possible then temporarily (as a meanwhile use).

D. Food production enterprises and community gardens to partner Councils in local forums to implement the ‘London Food Strategy’ (2006), ‘Cultivating the Capital’ (2010) and the ‘Milan Urban Food Policy Pact’ (2015). 3

E. Agriculture land uses should be prioritised in Urban Fringe & Green Belt areas. 4. Boroughs in the urban fringe of London to provide land for development of farm enterprises and farm-to-table housing communities. 5

F. Local Authorities will support food producers by investment through Section 106 and the Community Infrastructure Levy, specifically to support food growing activities to take place on lands held or acquired by private bodies for ‘development’. Examples include the establishment of mini-allotments in housing estates, Community Asset Transfer, and rent reduction for initial set period.

G. GLA and Local Authorities to independently purchase at least 15% of their total supply of foodstuffs from small-scale, nonchemical producers located in and around London by 2020, 25% by 2030 and 30% by 2036 — to increase demand for short supply chain and build sustainable local economies.

All This Requires:

A. Development that increases or enhances land for food production for community use will be supported. Consideration should be given to growing space that will be suitable for communities' needs, water requirements, greywater recycling for irrigation, considering sunlight and access needs. Growing space could be part of the soft landscaping strategy or part of the green space provision, or use more innovative solutions such as roof gardens.

B. Support should be provided to planning applications related to food growing for vital infrastructure such as large scale glass houses, cold stores, containers, packing areas. Moreover planning should consider local distribution of produce, providing suitable office space and creating local distribution hubs. Local authority planning should draw upon the knowledge of successful food growing enterprises and be part of wider strategically zoned planning that includes Urban, Peri-urban and Rural food growing sites working together to provide food for the city.

References:

1. Urban, peri-urban and rural food growing are characterised by the areas in the city, between the city and the countryside, and the countryside, respectively.
2. The city of Almere (Netherlands) is an example that demonstrates how urban agriculture can become a driver for regeneration. The Dutch University in Wageningen designed a virtual rural-urban city district called "Agromere". In this virtual district, agriculture and urban living merge with each other taking into account the need of all parties involved. This project inspired the city of Almere to implement urban agriculture in its development plans. The draft structural vision "Almere 2.0" allocates land for 15000 new homes with urban agriculture as a main element of the green infrastructure.
3. "Since food policies are closely related to many other challenges and policies, such as poverty, health and social protection, hygiene and sanitation, land use planning, transport, energy, education, and disaster preparedness, it is essential to adopt an approach that is comprehensive, interdisciplinary and inter-institutional". Taken from the Milan Urban Food Policy Pact (2015) which was signed up to by the Mayor in 2015 and its points are to be incorporated into the enhanced London Food
4. Around 15 per cent of the capital's total area is agricultural land mostly in the Green Belt — less than 10% is actively farmed. (*Cultivating the Capital, food growing and the planning system in London*. January 2010 London Assembly)
5. Agriculture is one of the few land uses permitted in the Green Belt through National Planning Policy Framework (para 89) but it is often given a lower priority. See p31 and Appendix 6 — *Cultivating the Capital: food growing and the planning system in London* 2010, London Assembly.

Implementation:

The Mayor must carry these proposals forward and shape his other strategies accordingly, particularly the London Plan, Housing, Health Inequalities and Economic Development Strategies.

Integrated Impact Assessments

Just Space made detailed comments on the IIA's draft Scoping Report in February 2017, analysing that document with a social justice perspective. Whilst these comments are on record, and are referenced in the Equality Impact Assessment (p19), it is relevant to note that issues were raised over the adequate addressing of equalities or health, particularly since the Mayor had advanced the 'Fair and More Equal City' through his 'A City for All Londoners'.

On studying the Equality Impact Assessment, it seems that the only policy area recorded to have negative impacts on equality groups is that of water supply and the introduction of water meters to help manage demand. The Assessment of Policy Effects Table on Water (p25) states that:

“Proposals to provide efficient, reliable, secure and affordable water supplies will provide benefits for all Londoners. Proposals to introduce water meters should help address water poverty for low income households except for those who have higher essential use requirements, e.g. large families with children and disabled people with certain medical conditions.

• Londoners on low incomes	Disproportionate Positive Impact
• Large families with children	Disproportionate Negative Impact
• Disabled people with certain medical conditions	Disproportionate Negative Impact”

However, it seems that no mitigations/enhancements have been recommended through the IIA process as a result of this. Indeed, consulting the IIA Full Report on the Policy Area for Water, the recommended enhancement is not because of the EqIA, but because of the Assessment of Economic Impacts :

“The final LES could more specifically address how the Mayor will support innovations and development and uptake of new technologies which will improve sustainability in the water sector. For example, linking to possible funding/investment routes, supporting business case development, working with water companies to undertake resource efficiency assessments of key water users, review the success of water efficiency measures in the domestic sector (beyond behaviours). (Table 7.1 Key Recommendations from IIA, p89).

Whilst it is gratifying that “following the review of [the IIA SR] consultation responses received the IIA guide questions were reviewed and amended to better reflect the scope of the strategy and ensure that all assessments were addressed” (EqIA p19), there should be follow through into adjusting policy and proposals. Otherwise, the IIA process is simply an elaborate ‘tick box’ exercise.

The importance of attending to the results of impact assessments is set out in the IIA Full Report, in particular Section 3.3.2 EqIA (p11).

The IIA is now at Stage D (see fi 3 p8) and no known public consultation on the IIA has happened at Stages B and C. Close reading of still relevant ODPM Guidance and the EU Directive has generated the Just Space analysis that sets out the required and recommended involvement of the public at the early formative stages. This is below. The ODPM guidance on p10 applying Article 6.1 & 6.2 explains that the public shall be given an early and effective opportunity ... to express their opinion on the drafts... at both Stages B and D. The public were not given this opportunity. A caution on engagement was given in the Just Space comments on the Scoping Report, but has not been heeded.

Involvement of the public at Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope

Just Space comment: Stage A identifies other relevant policies, plans, environmental protection objectives and the current state of the environment – baseline information and environmental problems; develops SEA objectives; and consults on the scope of the assessment.

Fig 1 – The SEA Directive’s Requirements on Consultation (scoping stage) At Stage A

- authorities with environmental responsibility, when deciding on the scope and level of detail of the information to be included in the environmental report (Art. 5.4). [p10 ODPM Practical Guide]

But see also para 5.A.2

Responsible Authorities need to consider what information they already have and what more they will need. They may already hold useful information, for example from environmental assessments of previous plans or programmes. It may be useful to consult the public at this stage to seek additional information and initial opinions. [[p26 ODPM Practical Guide]

And Appendix 3

- Other consultees, including representative bodies and members of the public, who often have a wealth of knowledge and understanding of the strategy or plan area, e.g. local conservation groups.

Involvement of the public at Stage B: developing and refining alternatives and assessing effects

Just Space comment: Stage B tests the plan's objectives against the SEA objectives; develops strategic options including reasonable alternatives, predicts/evaluates the effects of the plan and alternatives, considers mitigating and maximising beneficial effects; and proposes monitoring measures.

Fig 1 – The SEA Directive's Requirements on Consultation

At Stages B, D

- authorities with environmental responsibility and the public shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2).

[p10 ODPM Practical Guide]

Appendix 6 developing and assessing alternatives

“Stakeholders may usefully be involved in the generation and assessment of both strategic and

more detailed alternatives through consultation. Demonstrating that there are choices to be made is an effective way of engaging stakeholders in the process. The alternatives considered

throughout the process must be documented and reasons given on why they are or are not taken forward.”

[p69 ODPM

Practical Guide]