

CROSS RIVER
PARTNERSHIP

Consultation: London's Environment Strategy 2017

Response from Cross River Partnership (CRP)

2nd November 2017

VIEWS AND INFORMATION

The views expressed in this submission are on behalf of Cross River Partnership (CRP) staff as a group of professionals with expertise in urban regeneration and sustainability projects and do not necessarily reflect the views of our funding and Board partners.

In this response CRP is not promoting solutions to the issues being addressed; only suggesting opportunities which could be investigated in the context of central London.

CONTACT DETAILS

Cross River Partnership
6th Floor
5 Strand
London
WC2N 5HR
crossriverpartnership.org
@CrossRiverPship
Phone: 020 7641 2198

WHO WE ARE

[CRP](#) is a public-private partnership that has been delivering regeneration projects in London since 1994.

CRP is currently delivering a range of regeneration programmes in the central London sub-region, which each contribute to the achievement of one or more of these objectives.

- Sustainable employment opportunities
- Economic growth and prosperity
- Air quality and carbon reduction
- Making places that work

CRP is a voluntary association of local authorities, business organisations and other strategic agencies relevant to London. We deliver programmes alongside Transport for London, the Greater London Authority, central London boroughs, and Business Improvement Districts (BIDs).



CRP Partner Boroughs:	CRP Partner BIDs:	
● Camden	① Angel London	⑭ The Fitzrovia Partnership
● City of London	② Baker Street Quarter Partnership	⑮ Vauxhall One
● Islington	③ Better Bankside	⑯ Victoria BID
● Kensington & Chelsea	④ Camden Town Unlimited	⑰ WeAreWaterloo
● Lambeth	⑤ Cheapside Business Alliance	
● Lewisham	⑥ Euston Town BID	CRP Strategic Partners:
● Southwark	⑦ Hatton Garden BID	Greater London Authority
● Westminster	⑧ Heart of London Business Alliance	Groundwork London
	⑨ Marble Arch BID	London & Partners
Boroughs CRP work with:	⑩ New West End Company	Network Rail
● Hackney	⑪ Northbank BID	Transport for London
● Hammersmith & Fulham	⑫ Paddington Now	
● Tower Hamlets	⑬ South Bank BID	CRP Accountable body:
● Wandsworth	⑭ Team London Bridge	Westminster City Council

With this partnership, CRP is uniquely placed to coordinate businesses, boroughs, and community groups who call London home to deliver environmental sustainability and other interventions.

Cross River Partnership is delivering ambitious programmes to improve London's environment, improve air quality and delivery healthy streets. Information on CRP's projects and programmes can be found in Appendix A.

RE-SHAPING OF LONDON'S ENVIRONMENT STRATEGY (LES)

CRP acknowledges the need for a cohesive environment strategy that aligns with the Mayor's vision for 'A City for All Londoners'.

Through our projects and partners, CRP is committed to ensuring that London remains an attractive place to do business and that London's environment enhances the quality of life and health of workers, residents and visitors alike. We are pleased to have the opportunity to share our knowledge and experience in the fields of sustainability, green infrastructure, public realm, place making, health and well-being, freight, waste, air quality and associated behaviour change initiatives to feed into the LES.

Overall this strategy sets out the agenda that will undoubtedly improve the environment for all Londoners. CRP is pleased to see a document that attempts to recognise the interlinkages of all of the Mayor's environmental responsibilities. CRP acknowledges the need for a strategy which provides integrated solutions to address the city's growing population to make London an enjoyable place to live, work and visit.

CRP's response is structured around the 11 chapters of the LES, focussing on answering the key consultation questions. Each section will highlight particular challenges and opportunities as well as draw experience from CRP's projects, including tried and tested solutions.

CHAPTER 1: LONDON'S ENVIRONMENT TODAY

CRP believes that the environmental challenges London faces today are significant, and agrees with the issues that the strategy has set out. However, the issues set out are very focused on the physical environment, which does in part ignore the social impact of environmental problems. Further issues that could be considered as part of this strategy (linked to the Mayor's other strategies) include:

- The population's perception on environmental issues; to implement a drastic change in London's environment, the mobilisation of a large proportion of London's population must occur.
- Severe traffic congestion in and around the city which can impact on health and wellbeing.
- Disproportionate effects of poor air quality on London's most vulnerable populations including the elderly, school children and lower socio-economic groups.
- Odour, from areas such as waste and drainage systems in the capital.

CHAPTER 2: TRANSFORMING LONDON'S ENVIRONMENT

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

The outcomes of Greener, Cleaner and Ready for the future summarise the goals of the strategy well. CRP is keen to support this vision for the city to be sustainable for future generations.

The LES has a number of admirable aims, however there is sometimes a lack of detail on how the Mayor plans to meet these aims and what other organisations can do to contribute. While a number of the overall aims are well defined, more definitive and aggressive goals could include:

- A more ambitious target than being over 50% green by 2050, which is only a 3% increase in coverage from today. The quality and accessibility of new green infrastructure should be part of a measurable target.
- More aggressive short term targets in air quality, that target both emissions from transport as well as others including buildings and construction.
- Waste targets that will truly mean that London is a zero waste city; with resource inputs and circular economy development considerations led through public procurement for example.

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

It is great that the Mayor commits to ensuring that the GLA, TfL and Metropolitan Police will lead by example to deliver on these aims.

The best way to deliver the aims for this strategy is for all of London's stakeholders to work together. By calling upon central and local government, businesses and their representative organisations (e.g. BIDs), organisations and residents to collaborate is essential to deliver many of the Mayor's aims. There are also important contributions to be made by landowners, developers, voluntary and community sectors. Collaborative working across traditional professional disciplines will be critical to quickening the realisation of this LES e.g. environment, transport, engineering, architecture, planning, development, health, community.

The Mayor should set guidance on the role of business, authorities and residents in meeting the objectives of the strategy including how sub-regional partnerships can contribute. Existing partnerships such as Cross River Partnership; London Councils; West End Partnership and more are well placed to support delivery of this strategy.

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

River water quality is discussed as an issue in chapter 1 but is not adequately addressed throughout the LES. While CRP acknowledges that water based issues are discussed in the green infrastructure chapter, a separate water chapter should be included as it is a significant issue within London's environment. Additionally, the LES should better address river based emissions from transport on the Thames as detailed in the Port of London Authority's draft air quality strategy.

4. There are a number of targets and milestones in this draft London Environment Strategy, what do you think are the main key performance indicators that would demonstrate progress against this integrated strategy?

The key performance indicators to demonstrate progress for the integrated strategy should be:

Air Quality/Carbon

- Volume of particulates; ozone; NOx emissions by sector; measured against WHO air quality guidelines.
- Reduction in total vehicle numbers and the % of clean vehicles (including freight and public transport alongside private vehicles).

Waste Management

- % of total recycled waste including commercial, kerbside households, flats and construction waste.
- % new developments with facilities to accommodate increased:
 - o compaction of waste on site (e.g. digestion/water extraction);
 - o segregation to enable re use of materials;
 - o use of construction materials made for decommissioning and reuse.

Biodiversity & Greening

- % of new developments which contribute to biodiversity net gain.
- % of green coverage and % of publicly accessible green coverage.

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

Awareness and behaviour change campaigns will ensure that all Londoners are involved in supporting the strategy. The Mayor, with Transport for London, has unique access to communicate messaging to Londoners through the public transport network. This should be utilised to improve awareness of the Mayor's aims and actions that individuals and businesses can take to support this. CRP has experienced first-hand the beneficial outcomes of behaviour change campaigns and their effectiveness in creating positive change in London's environment. Some of CRP's projects using behaviour change include:

- [Clean air route finder](#) to reduce and raise awareness of air pollution exposure in central London and encourage active travel.
- Visual, physical interventions to unlock walking links by improving lighting. This helps overcome barriers to walking and movement. For example, CRP has [improved walkability](#) in Southwark by installing a colourful lighting scheme at the entrance of Newington Estate.

This builds on the success of CRP's strategic, Section 106 Planning Gain-funded initiative [Light at the End of the Tunnel](#).

- [deliverBEST](#) online tool which encourages increased efficiency and retiming of freight deliveries for businesses to improve air quality in London.
- Anti-idling campaigns through the Clean Air Better Business programme involved raising awareness of the contribution of vehicle idling to air pollution in London and implementing behaviour change to get drivers to switch off idling engines. On days where these campaigns were run it was found there was a 20-30% decrease in peak air pollution levels ([Kings College, 2016](#)).

The aims in the strategy will only be achieved by mobilising and empowering all Londoners to make a positive change to their environment. Existing behaviour change tools, including the above examples, could be rolled-out to take immediate steps towards meeting the LES' longer term goals.

CHAPTER 3: NEW APPROACHES

It is important that this strategy highlights the new innovative approaches to sustainability and improving the urban environment, so CRP is pleased to see this focus in the strategy.

- The use of natural capital accounting is particularly beneficial as being able to economically value green infrastructure will assist the uptake of greening in central London. Through CRP's Greening the BIDs programme which is part-funded by the GLA we are aiming to create a toolkit to measure the economic value of small green infrastructure projects which will assist with this new approach as well as showing how economic benefits can be delivered alongside environmental benefits.
- The low carbon circular economy approach is crucial, in particular to lift resource management beyond recycling to design and purchasing/hiring for reuse. Taking into account carbon, and whole life cycle emissions is also important.
- CRP is particularly pleased to see the Mayor's commitment to ensuring development of the environmental sector; and a digital approach to city management. Digital tools to assist London to make better informed decisions, for example CRP's [Clean Air Route Finder](#), could be better used with promotion from the Mayor and Transport for London; to incorporate them into existing digital travel planning solutions.
- As transport is a significant contributor to emissions (NO_x; CO₂; particulates; to air and water via surface run off), the move to healthier streets is important to support Londoners in rethinking their transport options. For information see [CRP's Walkable London toolkit](#). More temporary street closures can provide immediate respite from emissions for a local area, and help people envision the possibility of a different feel to London, approach to transport and a change in how we use public space. For example, closing streets for Play Streets has been used to facilitate play across the capital including in Mayor's Air Quality Fund Low Emission Neighbourhoods (LEN). On 22nd September, to link to World Car Free Day, CRP delivered a [Community Green Street](#) in the Marylebone LEN.
- As the Mayor drafts his strategic London Plan, this will be an excellent opportunity to support all aspects of this LES, including 'setting the bar high' and requiring sustainable approaches to every aspect of developments proposed, so that we really are creating a London that all Londoners can be proud of and can thrive in.

CHAPTER 4: AIR QUALITY

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

The chapter incorporates many great air quality policies and proposals; however more should be done in order to meet these goals sooner. This is important in particular because of the impacts on public health, but also because the solutions exist and are ready to be rolled out.

The strategy needs to incorporate more aggressive solutions than are currently stated; to significantly improve London's air quality including:

- More pressure should be placed on commercial organisations to clean their fleet. Goods vehicles cover 16% of vehicle kilometres in London but produce 22% of total road CO₂, 36% of NO_x, and 39% of transport particulate matter (PM₁₀)¹. As such, the challenge needs to be put to freight operators to do more in converting to cleaner fleets. CRP's [FREVIEW project](#) has established that electric freight is a viable alternative to conventional diesel freight vehicles.
- Local authorities should be pressured to convert their fleets to zero emission vehicles. The GLA's fleet should lead the way and should set a more aggressive aim to convert their fleet to zero emission well before 2050.
- As a significant procurement power, the GLA and associated organisations should be requiring their subcontractors to upgrade their fleet, and consolidate delivery trips.
- The Mayor's draft London Plan will need to set aside land for consolidations of deliveries / logistics.
- The ULEZ could be even more ambitious. Set policy measures far ahead, bearing in mind that commercial fleet operators are making purchasing decisions now that will affect their fleet composition in 7 years' time.
- Open dialogue with British commercial and private vehicle manufacturers to encourage more innovation in terms of the switch to zero emissions. Stimulate that sector to grow.
- Introduction of zero emission buses before 2037.
- Where it is within the Mayor's reach, there is a need to include targets for zero emission boat and rail transportation within the LES.

¹ [1] content.tfl.gov.uk/technical-note-03-freight-servicing-and-logistics-in-london.pdf

- Taking action to tackle poor air quality on the London Underground network from PM pollution resulting from resuspension and wear of brakes pads from underground trains (i.e. going beyond the proposed research activities to take action).
- Work with Local Authorities to be more ambitious about the volume of temporary and permanent closures of roads to some / all vehicular traffic – re-imagining London’s space.
- Work with businesses and homeowners to clean diesel generators, upgrade gas boilers and reduce use of fireplaces/wood burning to improve air quality within indoor environments.
- The Mayor should ensure that any events organised or sponsored by the GLA use low emission generators; and that all suppliers are committed to low emission equipment.
- Make Air Quality part of the London Curriculum.
- Continue lobbying for diesel scrappage scheme and new Clean Air Act at a national level.
- Continue to work with central government on tax incentives for zero emission vehicles.
- Continue to make available Mayor’s Air Quality Funding for programmes to trial innovative and collaborative approaches to improving Air Quality.
- Run advertising campaigns on simple measures parents can take to protect their children (very few parents would now smoke a cigarette in a car with children present).
- Lead by example – the Mayor and his advisers walking not driving to meetings.

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

It’s important to raise awareness of air quality. In particular, to enable Londoners to avoid unnecessary exposure to air pollution. This could be emphasised further, with provision of more details on how awareness will be raised. For example, providing educational classes, raising awareness of personal pollution exposure such as clean air walking routes, anti-idling days and other such initiatives should be included as practical examples within the LES.

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

CRP is particularly pleased to see policy focussing on children and lower socio-economic areas, which are disproportionately affected by air pollution. The partnership has been involved in creating clean air walking routes for school children who walk to school, incorporating such initiatives would not only assist in reducing exposure to air pollution but also increase their awareness of air quality.

Developing a marketing campaign to promote the use of a [clean air walking route tool](#) through schools could drastically reduce children's air pollution exposure today. CRP has already begun this work through its project management work on the Marylebone Low Emission Neighbourhood.

4. 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)?

Yes, on high pollution days, CRP would welcome road closures and vehicle restrictions. PM2.5 is found to be detrimental to populations' health even at small quantities so restrictions on vehicles to preserve public health should be paramount at all times.

It is important that temporary road closures are a last resort, and that aggressive preventative action is taken first. CRP would welcome even stronger measures to move even more streets to pedestrianised permanently or at certain times of the day.

CRP is strongly in support of encouraging active travel and use of public transport, pedestrian only streets, reducing vehicle trips and increased charges on vehicles in London such as the ULEZ. Making these initiatives more widespread will help reduce the number of high pollution days within central London and reduce the need for emergency measures.



5. 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)?

More needs to be done to increase the awareness of air pollution sources within the home, in addition to continued subsidies for low emission boilers. Support for a restriction on the installation of wood burning stoves and similar outdated methods of heating, also needs to be included within the strategy. These can be a significant source of PM pollution not only for ambient pollution but in indoor areas as well and are currently on the increase.

In addition, businesses could be considering more than just transport emissions. CRP's Business Improvement District partners are currently engaging with businesses on multiple environmental issues, including air quality and carbon reduction. For example, CRP developed this online tool <http://airquality.newwestend.com/> to support businesses to make positive change to their local air pollution. The GLA could maximise the impacts of this work through working in partnership with CRP and the BIDs to reach businesses.

CRP's Air Quality Experience

CRP has extensive experience in delivering initiatives which improve London's air quality, these initiatives are discussed below and continued delivery of such initiatives will assist with achieving the Mayor's air quality goals.



Clean Air Walking Routes: Exposure to air pollution can seriously affect our health. Luckily simple changes to the way we commute and explore the city can dramatically lower exposure. Businesses are encouraging staff and customers to reduce their exposure to pollutants, by taking safer, 'low-exposure' walking routes. This is being achieved by:

- Promoting awareness of initiatives such as the Wellbeing Walk which provides a safer, cleaner and more pleasant route between King's Cross and St Pancras stations and has increased footfall past many retailers.
- With the use of research from King's College London (KCL), CRP developed the online clean air route finder which encourages on street signalling of clean air routes to keep pedestrians well informed of healthy alternatives to highly polluted areas. Independent monitoring by KCL has shown that air pollution concentrations are between 30 and 60 per cent lower than heavily used alternatives between transport hubs and key pedestrian alternatives.

For these types of projects effective community engagement is crucial to ensure the support of residents and business and the overall effectiveness of the project; in terms of behaviour change projects like these have the ability to improve the life and wellbeing of residents on a local scale and inspire widespread change on a regional level.



Procurement and preferred supplier schemes: With the support of the Mayor's Air Quality Funded Clean Air Better Business CRP programme for BIDs and Local Authorities, hundreds of businesses are using their buying power to support suppliers who take air quality seriously and to reduce unnecessary trips by delivery vehicles. For example:

- The West End Buyer's Club is a website developed as part of the New West End Company Air Quality Strategy. The website details preferred suppliers of goods and services operating across London's West End to save businesses money and improve London's air.
- By procuring collectively, members of The Fitzrovia Partnership saved over £200,000 in just one year while reducing the impact their supply chains have on local congestion and air quality.

Victoria BID's [Zero and Low Emission Supplier Directory](#) can be used by businesses to identify suppliers which deliver goods in a zero or low emission vehicles.



Delivery Servicing Plans: CRP works with businesses to understand patterns of freight movement and identify improvements to reduce traffic congestion and improve local air quality.

- CRP is rolling out [deliverBEST](#) with CRP partners Better Bankside and Victoria BID. deliverBEST is a new online tool and business support programme that enables businesses to quickly identify relevant actions they can take to improve the efficiency of their deliveries, save money, reduce congestion and cut air pollution
- Our [Oxford Street West District Delivery and Servicing](#) research was part of the wider West End Partnership Programme and worked with local businesses to identify how they received deliveries and servicing and how supply chains might be streamlined to achieve greater efficiencies and save on costs



Fleet choices: Freight Electric Vehicles in Urban Europe (FREVIEW) is an EU Seventh Framework Programme funded project which demonstrated new freight delivery approaches to create a quality urban environment, while supporting business growth and improving air quality.

- [FREVIEW](#) in London is working in partnership with UPS to demonstrate that last-mile, consolidated deliveries can be done using EVs.
- Proof in concept of Consolidation Centres for Electric Freight Vehicles, a study in Camden found that the consolidation centre reduced diesel mileage by up to 80%.



Reducing personal deliveries to the workplace in central London: CRP has led on a project to encourage individual behaviour change at work to improve air quality in central London.

- We have launched a new interactive web based tool called [Click. Collect. Clean Air.](#) to identify the most convenient parcel collection points around London.

New West End Air Quality Strategy

Cross River Partnership is working with New West End Company to deliver a strategy to improve air quality in the busy West End shopping area. This Air Quality Strategy aims to deliver a significant reduction in air pollution between 2016 and 2020. It complements the action that will simultaneously be undertaken by public authorities, including Westminster City Council and Transport for London. Initiatives of the programme include:

- Consolidating suppliers (via the West End Buyers Club)
- Developing and implementing Delivery and Servicing Plans
- Providing cycle-friendly workplaces
- Encouraging visitors to arrive in the West End using low-emission travel modes

CHAPTER 5: GREEN INFRASTRUCTURE

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

There needs to be a requirement within the National Park City framework for new and existing green infrastructure to be of high quality which is useable, contributes to the city's biodiversity and is publically accessible as far as possible. The aspiration of having a National Park City is fantastic, so it would be useful for the MES to clarify what being a National Park City will mean in practical terms for London.

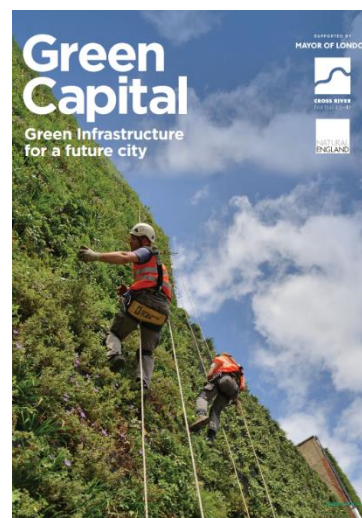
The key attributes important to a National Park City would be:

- Consistent greening; marking routes and taking people using active transport modes on key paths between landmark destinations
- Areas to pause and enjoy greening; parks and small urban greenery; with seating and areas to socialise
- Accessible greenery; for people from all walks of life; with particular focus on children and learning
- People should live and work within 5 minutes walking distance of green space
- Journeys and green linkages should be signposted in innovative ways; using greenery to develop pathways through the city
- The City should 'feel' green and pleasant
- Consideration of how indoor greening can be used to make London a true park city. With such a large proportion of Londoners' time spent indoors this can be a significant part of the experience.

2. 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?

Similar to other chapters it would be good to have a road map on how the aims are planning to be achieved. Aims like improving access to public green spaces need to be better defined and measured to be able to quantify the success of these actions. This detail would assist organisations with how they can contribute in meeting the Mayor's green infrastructure aims.

The Mayor could maximise the contribution of other strategic bodies to London's network of parks and green spaces e.g. Network Rail own significant stretches of linear paths alongside railway lines, for repair purposes. These are often locked. Having a strategic approach towards opening more of these up for new, greened walking and / or cycling routes could make a huge contribution to London as a National Park City.



The Mayor needs to provide a framework under which all sorts of different park / green space management / maintenance models are possible at neighbourhood levels. There is no one size fits all. Recognising the scarcity of traditional public sector grant funding to support this type of activity, as many different willing partners from different backgrounds and sectors need to be inspired to come together and care about open spaces, by the Mayor.

The Mayor should use existing partnerships to deliver consistent, linked greening, helping to maximise and extend current ambitions. Partnerships could include CRP's Greening the BIDs programme, the Mayor's Low Emission Neighbourhoods, and / or the Wild West End project.

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

Increasing green areas does not necessarily lead to protecting and enhancing wildlife. There needs to be better details on how and what wildlife is aimed to be enhanced and protected within the LES. For example, consideration needs to be given to the maintenance of green spaces, including the detrimental effect insecticides and fertilisers have on London's wildlife.

The LES should commit to supporting corridors for wildlife in all types of environment for example consideration of the health of other wildlife habitats such as buildings for bats; and water quality in the rivers.

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

The aim of making half of London green could be more ambitious as 47% of London is currently already 'green'. Improving access to public green spaces should be incorporated within this aim as there are a significant proportion of private parks and gardens which make up green spaces within London, and are inaccessible to the majority of Londoners. Again, this will be detrimental to the most disadvantaged populations who live in homes without outdoor space; and are more likely to be in areas with worse air pollution.

Care should be taken over the increase of London's tree canopy cover as canopy can increase the concentration of air pollutants within street canyons due to decreased ventilation. While this should not stop tree planting, there is a need to ensure appropriate planning of greening infrastructure to ensure the ambient environment is not degraded, linked to the Mayor's plans to remove transport sources of air pollution.

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

Of the main objectives in the chapter, CRP are in full support of the aim in creating an accepted way of valuing green spaces so businesses / developers / landowners can see the economic benefit of providing green infrastructure. A tool which specifically aims at valuing the economic benefit of

green infrastructure such as green roofs, living walls and rain gardens would be a useful to encourage further green infrastructure in London's congested city centre.

Indoor greening and biophilia is important for health and wellbeing, which has an economic benefit, particularly for employers. The LES could make a commitment to communicating this to businesses to help scale up greening in and around buildings owned by the private sector; as well as leading by example at City Hall.

CRP's Green Infrastructure Experience

[Greening the Business Improvement Districts \(BIDs\)](#)

Over the past five years, supported by seed funding from the Mayor of London, Drain London Fund and Natural England, Cross River Partnership has coordinated The Greening the BIDs Steering Group, bringing together Business Improvement District to deliver 19 Green Infrastructure Audits and 16 GI installations, including rain gardens, green walls and green roofs, across central London. As part of the programme a video was produced [discussing green infrastructure for a future city](#).

CHAPTER 6: CLIMATE CHANGE MITIGATION AND ENERGY

1. 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?

It is fantastic that there is a road map on how the strategy aims to make London a zero carbon city and intermediary aims for carbon budgets over progressive time periods.

The proposals could bring forward goals to the early 2020s for the GLA fleet to be carbon zero and zero emission bus fleets. Additionally, a more challenging target above the aim of 15% on renewable energy for London would be useful to accelerate this programme. Goals on supporting and communicating how businesses can contribute to a zero carbon city should also be incorporated. For example, as 97% of businesses in London are classified as small, it would be useful to include ways in which these businesses can reduce their carbon footprint through retrofitting.

2. 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?

Yes. The government will need to incentivise householders to make this change, particularly in low income households.

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

CRP is currently piloting a programme named [Smart Electric Urban Logistics](#) (SEUL) which investigates the use of smart grids to recharge electric vehicle fleets at non-peak loading times. These types of technological initiatives to influence behaviour could be effective in reducing energy use and carbon emissions and will facilitate the move to electric vehicle use to help overcome significant current issues with grid capacity.

Other schemes similar to the ULEZ would encourage businesses to uptake zero emission vehicles. [Freight Electric Vehicles in Urban Europe](#) (FREVIEW) is another project managed by CRP which proved the viability of last mile electric freight vehicles. This type of initiative would assist with reducing carbon emissions.





Awareness and behaviour change campaigns interlinked with air quality such as anti-idling campaigns, implementation of low emission neighbourhoods, improving freight efficiency and other such initiatives could also assist with reducing energy use and carbon emissions. Solutions which tackle multiple problems at the same time will provide good value for money in implementation.

CRP's Climate Change Mitigation Experience

The need to explore smart charging for Electric Freight Vehicles (EFVs)

- Most UK cities experience an air pollution and CO₂ emission crisis
- In London, freight vehicles cover 16% of vehicle kilometres, but produce a disproportionate amount of 22% of total road CO₂, and 35-40% of local air pollutants
- EFVs can play an important role in addressing these issues with zero tailpipe emissions and significant CO₂ reduction potential
- Large-scale deployment of EFVs will involve the electrification of larger fleets, such as the UPS one in central London.
- The introduction of large electric fleets is currently hindered by potential constraints in the existing local grid infrastructure.

Turn over to see what the Smart Electric Urban Logistics project has set out to do about this

The Smart Electric Urban Logistics Project (SEUL)


The global logistics company UPS is committed to greening its delivery fleet. At the start of this project UPS has integrated 52 fully electric trucks and, because of the existing electric infrastructure and lack of EFVs, is being held back introducing more.

For the SEUL project, UPS has partnered with UK Power Networks and Cross River Partnership to:

- Extend the number of electric freight vehicles at their central London depot by 20 EFVs, bringing the number above the maximum that can theoretically be charged at any one time
- Design and implement an innovative smart charging system at this depot together with an energy storage system
- Design and implement a sophisticated network capacity assessment tool developed by UK Power Networks to take into account time of day variation in demand
- Develop a roadmap for how all of UPS's 170 central London vehicles could be electric
- Deliver a scalable set of outputs, which other logistics and freight operators can implement.

SEUL is a two-year project that commenced in April 2017, and is co-funded by the Office for Low Emission Vehicles (OLEV).

To register your interest in SEUL and be kept informed of news, progress reports, fact sheets, and conference attendance, please visit: www.crossriverpartnership.org/projects/smart-electric-urban-logistics/



Office for Low Emission Vehicles

Smart Electric Urban Logistics (SEUL) –

The SEUL project is part of the Low Emission Freight and Logistics Trial funded by the Office for Low Emission Vehicles in partnership with Innovate UK. SE UL provides a smart set of solutions for electricity needs for electric freight vehicles which will support this change without the need to upgrade current infrastructure and make a vital contribution to cutting emissions in central London. It will also provide a scalable set of outputs which other logistics and freight operators can implement to improve their vehicle fleets and ultimately the environment.

CHAPTER 7: WASTE

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

It is great to see that the Mayor is committed to making London a zero waste city by 2050. The strategy should refer to a more definitive understanding of what a 'zero waste city' is. The current definition of "A city that makes best use of all its waste where market opportunities exist to recover value from it" is difficult to meaningfully quantify.

The LES should focus on wider community objectives and how the community can contribute to the aims in the LES. More focus should be placed on influencing commercial wastes (through the municipal waste authorities, or more widely communicating with business); visitors to London and harder to reach residents.

The strategy could be further improved by not only increasing recycling but also encouraging businesses to consolidate and compact their waste and recycling on site, then sharing waste contractors with neighbouring businesses to vehicle collections; and improve air quality. CRP has implemented this type of initiative within the Heart of London BID where there is a single supplier for waste and recycling services in order to reduce environmental footprints (<https://heartoflondonbid.london/what-we-do/street-management/air/>).

The strategy could be taking a much more future-conscious approach. While the LES talks about circular economy; the main targets are focused around ensuring waste is recycled; rather than promoting the manufacture of products designed for reuse. Providing a more resource-led approach to the strategy would enable wastes to be completely rethought. Without this innovative approach to the way London considers resource use, a transition to a truly circular economy, and a truly zero waste city, will not happen.

2. 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?

The change to an across-the-board standardisation in London will assist with communicating rules and raising awareness on what can be recycled in London. This will need to be implemented for all types of waste; from all types of properties to include commercial; on-street bins; residential and flats.

3. Do you think the Mayor should set borough specific household waste recycling targets?

Yes, to ensure that all boroughs are increasing household recycling rates from the current baseline.

4. What needs to happen to tackle poor recycling performance in flats?

Raising awareness and providing incentives to recycle will assist in tackling poor recycling performance in flats. The current aim to target recycling rates of only kerbside households within the LES does not go far enough and should also include flats.

There is a particular issue in flats with poorer recycling services being provided than in kerbside households. Innovative solutions could be implemented which enable simpler movement of wastes to central bins facilitating improved sorting rates.

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

Increasing availability of water refill stations in public areas around London will also reduce single use water bottles. Incentivising food outlets to implement free filtered water taps would be an effective way improve access to water across London.

Working with central government to charge consumers for use of single use packaging such as coffee cups and plastic straws, similar to the plastic bag charge scheme could also assist in reducing single-use packaging.

CRP's Waste Experience

[Heart of London Deliveries, Waste and Recycling Plan](#)

Development and implementation of a plan to reduce the visibility and volume of delivery and servicing vehicles in the Heart of London area; plus a reduction in the visibility of waste on the street. This 4-year programme engages businesses through a variety of measures including preferred supplier schemes; waste reduction; and reducing personal deliveries to the office.

CHAPTER 8: ADAPTING TO CLIMATE CHANGE

1. Do you think the Mayor's policies and proposals are sufficient to increase London's resilience to climate change?

CRP acknowledges the need for London to adapt to climate change; however this goal should not divert focus on mitigating the effects of climate change as a primary objective. The chapter currently focuses mainly on warming and significant rainfall events. It should also ensure that it adequately addresses potential extreme weather events, which London will need to adapt to.

2. Do you agree with the Mayor's policies and proposals to make Londoners, more aware of the risks of climate change, like overheating in buildings and flooding following heavy downpours?

Awareness campaigns are the best way to communicate the risk of climate change. However there needs to be further incentives within the strategy to initiate the development of infrastructure required to adapt to climate change. The Mayor could also initiate audits of areas in London at most risk from climate change such as flood plain locations to ensure that necessary steps are put in place to increase awareness of extreme events.

3. Do you agree with the Mayor's policies and proposals to reduce water demand and leakages in London?

The Mayor could additionally undertake public awareness and behaviour change campaigns to reduce water demand, as some of the onus must fall on consumers to change.

4. What do you see as the biggest opportunities to tackle climate change risks in London and how can the Mayor support this?

Improving shade in the city and reducing the number of impervious surfaces by increasing uptake of rain gardens and through greening the city are simple ways in which the Mayor could move towards climate change adaptation. These initiatives would also assist with mitigating the impacts of climate change.

CHAPTER 9: AMBIENT NOISE

1. Are there any other actions you think the Mayor should be taking to work with the boroughs and other key stakeholders to reduce noise?

CRP fully supports ambient noise being included in part of the London's Environment Strategy as it is often a neglected part of the overall environment. One of the most important actions to improve noise is to include a mandate (currently 55dB from WHO) and agreed monitoring parameters regarding noise at a street level, similar to the current air quality monitoring network. More detailed information on noise within the city is required over and above the estimates calculated by DEFRA. With this information the effects of this strategy can be measured and appraised.

Other options which should also be included in the strategy are the introduction and research of noise dampening infrastructure in cityscapes to reduce the level of noise. The chapter should also acknowledge the interlinkages with air quality as a move towards zero emission vehicles is likely to reduce traffic noise within London.

2. Do you think that the boroughs and the Mayor have sufficient powers to manage noise across London? If not, what additional powers are required and which organisation should hold them?

It is difficult for boroughs and the Mayor to address noise concerns out of hours, and in particular where noise is short-lived; making evidencing the issue impossible. These noises are the ones most likely to disturb sleep and increase stress.

3. Do you agree with the Mayor's policies and proposals to improve Londoners' awareness of the health risks of noise?

CRP agrees with increased awareness campaigns of all issues Londoners' currently face, there appears to be a need to consolidate these campaigns so a unified voice of all issues is heard, including the health risks of noise. Additionally, the creation and promotion of quiet spaces would also assist with the improvement of London's soundscape. These measures will become more important as the 24-hour City policy for London is rolled out.

CHAPTER 10: TRANSITION TO A LOW CARBON CIRCULAR ECONOMY

The elements which are integral into moving towards a carbon circular economy are great, however, there needs to be further detail on how this sector will be stimulated. Even simple solutions such as imposing hand dryers and filtered water taps instead of bottled water could also help to meet this goal. Transitioning London to a low carbon circular economy will require a multifaceted approach to a number of different issues.

CHAPTER 11: GLA GROUP OPERATIONS – LEADING BY EXAMPLE

It is fantastic that the GLA is taking initiative on leading by example to create positive change in London's environment. CRP agrees with the examples on which the GLA has detailed in showing leadership, however believes that the GLA could be more ambitious with some of these goals, these include:

- 'Zero emission GLA fleets by 2050', this timescale should be more ambitious. Through our experience on FREVUE, the GLA could be the leader in showing local authorities and the private sector the ease in moving to zero emission vehicles today.
- 'All new cars and vans (less than 3.5 tonnes) in GLA group fleets, including response vehicles, being zero emission capable from 2025', the GLA needs to be more aggressive and should include rules in which all new cars and vans are zero emission from 2020. Zero emission vehicles could be started to be procured today.
- 'Waste' the GLA should be more specific with its recycling rate targets, including the aim to be zero waste by 2030.
- None of the GLA goals involves the implementation of awareness campaigns. As awareness has been a large focus of the LES, CRP believes the GLA should take an active participation in creating awareness, encouraging and stimulating growth of these types of campaigns.

FINAL REMARKS

The Mayor's new Environment Strategy is innovative in that it brings together differing aspects of London's environment, which is a first for this strategy. However, the synergies that could be realised between different areas have not been maximised. Pulling together different environmental streams together more clearly would assist with the readability and overall direction of the strategy. Having an integrated road map to show how each of the sections interact, overlap and how the overall aims are to be achieved would assist in envisaging the future of London's environment. Additionally, this integrated road map would assist CRP as an organisation on how to contribute to the aims of London's Environment Strategy.

CRP believes throughout the strategy that solutions which link different sections are not as developed as they could be and those actions which meet multiple aims should be prioritised. Examples include improving air quality by increasing the uptake of zero emission vehicles is also likely to reduce ambient noise, mitigate climate change and contribute to a low carbon circular economy. Implementing green infrastructure will decrease impervious surfaces which will improve the city's resilience to flooding and mitigate some of the effects of climate change; improving air quality, as well as reducing reliance on diesel-based transport through creating a city which is better to walk and cycle in.

A recurring comment throughout our response is there needs to be further details on how the aims of the strategy are to be achieved given that they are set for 2050. Many of the goals are not ambitious enough, in particular given the timeframes. Consideration by the Mayor into how he and the GLA can push improvements beyond what would be delivered by existing market patterns and aim for much stronger and faster change than is currently proposed. For example, in the Mayor's Transport Strategy, the draft Implementation Plan is useful to support this.

Finally, CRP believes that the LES needs to link more explicitly to finance throughout the document. As well as being good for the environment, many of the suggested policies are good for business too i.e. they can save businesses money, or generate higher rental yields, or save mental health referral costs to the NHS. These calculations need to be emphasised, so that different players are motivated to take the action that the Mayor rightly desires.

Cross River Partnership is uniquely placed to help to deliver the London Environment Strategy. Working with our 8 London borough; 19 Business Improvement Districts; and strategic partners (including TfL and the GLA) CRP is already delivering on many of the Mayor's desired outcomes. CRP has a successful track record and professional expertise to assist with delivering the aims of the strategy:

- CRP is delivering its second successful Mayor's Air Quality Fund sub-regional, public-private partnership programme with its partners.
- CRP's partners have existing excellent working relationships with each other and the LES is a chance to deliver even more innovation, to business and residents via an existing large public-private partnership.

- CRP also has existing excellent relationships with the community and housing sectors, landowners, voluntary sector, cultural sector and academic sector.
- CRP has externally-funded programmes, by both the public and private sectors, that could contribute match funding to LES and Greater London Authority programmes such as Liveable Neighbourhoods, Good Growth, Healthy Streets and Community Green Spaces.
- As demonstrated above CRP has in-depth and specialised staff knowledge working across the fields of Air Quality, Green Infrastructure, Place Making, Freight Consolidation, Economic Growth, Community Engagement, Urban Transport, Waste and Electric Vehicles.
- CRP has excellent management, reporting, delivery and staffing arrangements.

Cross River Partnership would welcome the chance to meet and work with the Mayor and his officers to further develop the draft LES, and to make a start on its implementation.

For further information on any of the comments made in this document, please do not hesitate to contact:

Susannah Wilks, CRP Director

susannahwilks@crossriverpartnership.org

Vicky Keeble, CRP Programme Manager

vickykeeble@crossriverpartnership.org

Appendix A

How CRP operates

CRP develops, fundraises for and delivers programmes that add value at a sub-regional level to the individual activities of its public and private partners. CRP operates with Westminster City Council as its legal authority.

CRP delivers projects via a number of programs targeted at addressing various environmental regeneration issues in central London. The following is a summary of programmes delivered:

[Greening the Business Improvement Districts \(BIDs\)](#)

Over the past five years, supported by seed funding from the Mayor of London, Drain London Fund and Natural England, Cross River Partnership has coordinated The Greening the BIDs Steering Group, bringing together Business Improvement District to deliver 19 Green Infrastructure Audits and 16 GI installations, including rain gardens, green walls and green roofs, across central London. The Living Wall on the side of the Rubens Hotel in Victoria is one high profile example. See appendix B.

[Central London Sub Regional Transport Partnership \(CLSRTP\)](#)

CRP facilitates this partnership of the eight central London boroughs (Camden, City, Islington, Kensington and Chelsea, Lambeth, Southwark, Wandsworth and Westminster) on behalf of Transport for London. The partnership undertakes research and trials innovative schemes involving both Local Authorities and BIDs to support growth and place making, encourage uptake of active and sustainable transport modes, improve air quality, and make the transport system more efficient. In 2015/16 the partnership facilitated:

- A secure cycle parking demand and feasibility study
- An area-based delivery and servicing review
- A waste consolidation improvement programme
- European funding for tailored freight logistics programme (FreightTAILS)
- A scoping study for a Low Emission Neighbourhood

[Freight TAILS](#)

CRP has successfully levered in funding from URBACT III to deliver Freight TAILS - Tailored Approaches to Innovative Logistics Solutions. Freight TAILS will share best practice and learning between 10 different European cities, and write this up in the form of city-specific Integrated Action Plans to achieve freight management that is as consolidated, clean and safe as it can be.

[Freight Electric Vehicles in Urban Europe \(FREVIEWE\)](#)

CRP is the lead partner for this 30-strong trans-national partners Programme to trial different sizes and types of freight electric vehicles across 8 countries across different climates, industry sectors and policy environments. Detailed statistical results will begin to come through during 2016/17,

showing the real contribution that freight electric vehicles (including large electric vehicles) could make to air quality and a cleaner London. This programme is funded by the European Union's Seventh Framework Programme.

West End Partnership Freight Programme (WEP)

As part of this work, WEP have set up Freight Group to pull together all the current projects working to reduce freight. The development of a plan to 2020 will ensure that enough is being done to keep the West End moving, with goods and services coming and going efficiently. The programme will look at reduction, re-timing and consolidation of freight movements, in addition to increasing ultra-low emission vehicle projects to deliver commercial, health and air quality benefits.

Smart Electric Urban Logistics (SEUL) – The SEUL project is part of the Low Emission Freight and Logistics Trial funded by the Office for Low Emission Vehicles in partnership with Innovate UK. SEUL provides an innovative set of solutions which will support this change and make a vital contribution to cutting emissions in central London. It will also provide a scalable set of outputs which other logistics and freight operators can implement to improve their vehicle fleets and ultimately the environment.

Clean Air Better Business (CABB)

Fresh from the success of Clean Air Better Business Phase 1, CRP is now delivering Clean Air Better Business Phase 2 with 16 inner London boroughs and BID partners, funded by the Mayor's Air Quality Fund. An exciting programme of collaborative behaviour change activities will be delivered with business over the next three years.

New West End Air Quality Strategy

Cross River Partnership is working with New West End Company to deliver a strategy to improve air quality in the busy West End shopping area. This Air Quality Strategy aims to deliver a significant reduction in air pollution between 2016 and 2020. It complements the action that will simultaneously be undertaken by public authorities, including Westminster City Council and Transport for London. Initiatives of the program include:

- Consolidating suppliers (via the West End Buyers Club)
- Developing and implementing Delivery and Servicing Plans
- Providing cycle-friendly workplaces
- Encouraging visitors to arrive in the West
- End using low-emission travel modes

Oxford Street West Business Engagement Research

Extensive research with businesses within the district to understand their current procurement and resultant deliveries and servicing activities. Discussing the issues around high volumes of freight and servicing vehicles in the district, and helping businesses consider implementing more efficient practice

Heart of London Deliveries, Waste and Recycling Plan

Development of a plan to reduce the visibility and volume of delivery and servicing vehicles in the Heart of London area; plus a reduction in the visibility of waste on the street

4-year programme to support the delivery of this plan by engaging businesses through a variety of measures including preferred supplier schemes; waste reduction; reduce personal deliveries to the office.

Through these projects Cross River Partnership has developed tools which provide practical advice to businesses on how to improve air quality and reduce local congestion. These actions benefit CRP's BID and borough partners as well as the businesses that implement them through improved operating efficiencies; improved staff health and an improved business environment. They are designed for use by any business, including being 'light-touch' for businesses that may not have sustainability resource.

deliverBEST

Cross River Partnership has developed an online tool that enables businesses to very quickly identify relevant actions they can take to improve the efficiency of their deliveries, save money, reduce congestion and cut air pollution. www.deliverbest.london has been developed based on CRP's experience working with over 50 businesses across central London and Europe.



CRP's deliverBEST business engagement team also support business to act on recommendations made by delivering bespoke 1:1 support, providing implementation insights, measuring results, and creating case studies to promote the impact of actions taken.

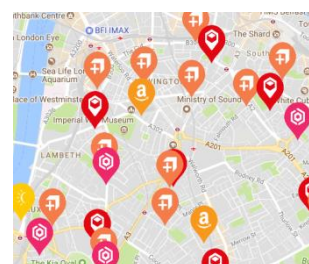
[West End Buyers Club](http://www.westendbuyersclub.london)

Cross River Partnership developed the West End Buyers Club (www.westendbuyersclub.london) shared supplier scheme for New West End Company. The tool has been reducing the number of waste and office supplies delivery trips across the West End and is now being rolled out across a wider geographical area, to cover additional Business Improvement District Areas and the Marylebone Low Emission Neighbourhood.



Click. Collect. Clean Air.

'Click and collect' services such as Amazon Lockers, Doddle and Parcelly consolidate parcel deliveries and divert unnecessary deliveries from congested and polluted high streets, especially personal deliveries. But the range of services on the market can be confusing, and many people are unaware just how easy, convenient and affordable 'click and collect' can be.



CRP's website www.clickcollect.london explains how the different click and collect services work, maps parcel collection points across London and the U.K., and provides free trials of premium options, making it easy for online shoppers to test alternative delivery options. A behaviour change campaign with materials including leaflets, posters and videos supports businesses to promote alternatives to workplace deliveries to their staff.

Recruit London

Recruit London is a free local recruitment service for businesses. Our workplace coordinators train and place out of work residents into jobs across central London. Our recruitment service appeals to the following groups:

Employers

The Recruit London service is free to employers and CRP offers up to six months of workplace mentoring, mock interviews and a tiered assessment process.

Partners

Our referral partners include a number of Business Improvement Districts, charities, the Job Centre and the Business Disability Forum. The relationship works a number of ways: we provide and receive candidates, and provide workplace coordinators to conduct work placement days onsite when a number of vacancies need to be filled.

Jobseekers

Our workplace coordinators get to know jobseekers so they can match skills with suitable full and part-time vacancies, for paid jobs, apprenticeships, work experience and other work opportunities.