

Appendix 1

Delivering London's energy future: The Mayor's draft Climate Change Mitigation and Energy Strategy for consultation with the London Assembly and functional bodies

The GLA group comprises the Greater London Authority and its four **functional bodies**:

Transport for London (TfL), The London Development Agency (LDA), the London Fire and Emergency Planning Authority (LFEPA) and the Metropolitan Police Authority (MPA) (to which the Metropolitan Police Service is accountable). The bodies of the group are diverse in their operations, size and in what they deliver.

General comments

- Will there be a programme of communication for the various initiatives and funding streams? It can be quite confusing what is exactly available. For the general public confusion is probably greater.

All comments

Section	Summary	Comments
1.Introduction	<p>GLA will leverage significant funding for low carbon programmes including:</p> <ul style="list-style-type: none">• Homes Energy Efficiency Programme (retrofit 1.2million London homes by 2015)• Building Energy Efficiency Programmes (public sector retrofit)• Low Carbon Zones• Decentralised Energy, including energy from waste (London Waste & Recycling Board LWaRB set up)	<ul style="list-style-type: none">• The spread of cities is discussed along with the need to plan decentralised energy (DE) for new developments but no consideration is given to planning the spread of the cities themselves i.e. not placing unnecessary constraints which result in further dense population of already overpopulated city areas.• Milder winters are discussed but no consideration of the extreme weather that will occur within this climate pattern. This will include extreme cold in some areas at discrete times and may further impact on the fuel poverty of low income families.

	<ul style="list-style-type: none"> • Electric vehicle roll out (10,000 electric vehicles in the capital) 	<ul style="list-style-type: none"> • Planning evaluation of DE is undertaken on the basis of number of applications. It would perhaps be more relevant to look at the total numbers granted. The two figures together would provide an indication of the acceptance of such measures and the existence of NIMBYism (not in my back yard) as a barrier to development. There should be measures in place to prevent the rejection of applications due to NIMBYism expressed in the consultation process without fully justifiable reasons. • Acronyms used are sometimes not defined, particularly in the executive summary. • Box 1.1 (and body of text) discusses the need to CO2 levels to peak by 2015. Suggest that it should be made clear that this does not mean an increase up to this time is acceptable. • The embodied carbon in transport of fuels is not taken into account. • Page 19. Sentence appears to break at end of page and be incomplete.
2. London's CO2 emissions	<p>2006 – London's CO2 emissions were 47.5 million tonnes (46% from workplaces)</p> <p>Target – 60% reduction by 2025 Interim targets: 22% by 2015, 38% by 2020</p>	<ul style="list-style-type: none"> • It is not clear if this emissions table includes aviation although aviation is included in the broad term of transport in the text • Aviation is not considered in the transport measures being implemented and expansion of this industry serves to produce an increase in emissions. Suggest that decreases in aviation capacity should be considered and the cost to the consumer reviewed to

		<p>reflect true cost including environmental cost. Accepting that this is not an area that the Mayor can directly influence it would be acceptable to include lobbying of central government as with other issues discussed</p> <ul style="list-style-type: none">• Suggest that the tube network should be promoted at pioneering electric transport – many people would not recognise this connection and the decrease in emissions associated• Energy from waste is discussed as a primary solution but no detail is provided. It is unclear from the strategy how the Energy strategy and Municipal Waste Management Strategy are to be aligned• Increases in population are cited as key contributor of increased emission but no mention is made of the increase associated with the increasing prevalence of single occupancy dwellings. This is also not considered in the latter part of the strategy that relates to planning. Single occupancy currently benefits from tax relief and this should potentially be the reverse situation to decrease consumption particularly in energy.• Outsourcing of the manufacturing industry to other countries is not considered. UK based companies are therefore able to ‘hide’ emissions by putting the energy intensive parts of their operations elsewhere resulting in no net loss of global emissions. It is difficult to determine how this could be effectively managed in the strategy but does imply that savings shown may not reflect the global picture.• Additional government measures – It is unclear why these are maintained as separate from measures already outlined
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<p>3. Making London one of the world's leading Low Carbon Capitals</p>	<p>3 top level policies:</p> <ul style="list-style-type: none"> • Support inward investment & create conditions to drive low carbon growth • Stimulate demand, supporting research and development and influence behaviour change • creating jobs and low carbon skills training opportunities <p>London Green Fund – will invest equity in projects (£8million LDA seed funding, aim to create £100m pot) JESSICA - £100m pot by 2011 for potential projects to bid for</p> <p>London & SE to be Low Carbon Economic Area</p>	<ul style="list-style-type: none"> • Figure 3.1 – Investment in transport seems to be disproportionate compared with potential GVA and jobs. This also seems disproportionate in respect of Figure 2.1 which indicates that transport (including aviation) is responsible for only approx 20% of emissions with buildings being responsible for the rest. This figure shows that investment in commercial buildings offers the greatest potential return and the greatest carbon savings and jobs thus boosting the economy. Transport could be considered at a relatively low cost through the planning system, making conditions for transport planning measures in new developments and renovations of existing buildings to expand use. It is unclear if this allocation is due to the funding availability for selected streams of work. If so, suggest that this should be made clear. • In order to trial some of the technologies, planning permission and monitoring of these schemes on a preferential basis would be desirable. This would allow the trials to take place with little investment required. • There is no information on how proposed green enterprise districts will be integrated and benefit the surrounding area. • Retrofitting is clearly going to be a large part of the work with regard to buildings. Is there potential to develop local policies to encourage such retrofitting, especially through the planning system? • Implementation of renewable and microgeneration of energy on a payback from savings basis would be preferable to a) encourage people to take up the initiative rather than seeing the cost as prohibitive and b) discouraging suppliers from installations where
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		<p>energy generation is unfeasible or of minimum load value</p> <ul style="list-style-type: none"> • Brent Council welcomes 'making London one of the world's leading Low carbon Capital's'. However if this is going to work, there will need to be a coordinated, well structured approach with appropriate communications. There should be an all encompassing London wide branding or accreditation scheme which ties the various support and funding streams together. This will enable easy recognition across London. Possible something like Croydon's ENVIBE scheme http://www.envibe.co.uk/ or Richmond's 'go green at work' http://www.richmond.gov.uk/gogreen/gg_work.htm • How does the Mayor plan to prioritise inward investment? There seems to be a lot for big businesses but little for SMEs. Should there be a two tiered approach? • There is significant pressure on public sector resources across London. Brent Council welcomes the investigation on how London can use joint procurement to stimulate demand for low carbon products and services. Brent council would like to see a study into the various structures of all London Boroughs procurements teams to establish methods pest practice cross boroughs. The Council is already part of the West London Alliance and would like to see this used for greener procurement. • Would like clarity on the Low Carbon Skills forum, is this for manual labour only or will it be all encompassing? • Would like some clarity on how the public and private sector are going to link and share ideas. Currently there is a lack of coordination and communication.
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<p>4. Securing a low carbon energy supply for London</p>	<p>The mayor aims to secure 25% of energy from DE by 2025 through the following programmes:</p> <ul style="list-style-type: none"> • London Heatmap • DE exemplar projects – London Thames Gateway HN, Pimlico, Whitehall • DEMap • LWaRB • JESSICA & London Green Fund • Dedicated centre of expertise <p>Gas, biomass & waste-fed CHP expected to be main fuel source, supplemented by wind, heat pumps & solar</p> <p>Through the planning system, the Mayor will work with boroughs to:</p> <ul style="list-style-type: none"> ▪ Identify DE opportunities ▪ Develop energy masterplans ▪ Detailed LDF policies on renewables (in particular large-scale) ▪ All new development to reduce CO2, connect to DE where feasible, consider site-wide CHP. ▪ Mayor will produce SPG on 	<p><u>Decentralised Energy</u></p> <ul style="list-style-type: none"> • Brent welcomes the focus on low carbon energy supply and in particular Decentralised Energy, the 25% target by 2025 is considered useful in focussing efforts in this approach to carbon reduction. • Whilst it may be that the overall cost of CO2 abatement is lower for area-wide DE schemes compared with stand-alone CHP plants, the upfront costs and difficulties of starting up and implementing an area-wide scheme need to be recognised. • It is likely that the realistic catalyst for realising DE opportunities will be new development that can provide, to an extent the infrastructure needed. However, significant additional investment funding will be necessary to realise area-wide DE. The Mayor should agree to act with energy suppliers and Government principally in order to secure investment funding to bring forward and secure key decentralised networks at an early stage of the development process. • The GLA/LDA should also consider procuring ESCOs at a London-wide level to attract the best investment and de-risk local schemes. • The GLA/LDA should also provide support for small community level organisations seeking to reduce carbon emissions. Funding
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	renewables	<p>opportunities and grant mechanisms should be made clear.</p> <p><u>Energy from Waste</u></p> <ul style="list-style-type: none"> • The GLA should tie together its Waste Strategy and ‘Climate Change Mitigation and Energy Strategy’ in terms of energy generation in a more lucid manner i.e. showing exactly how they overlap. • Developing markets for recycled waste should be promoted. • The costs of providing not just infrastructure for transferring energy should be made explicit in the documents and where developers/councils/RSLs can get funding. • The issue of land/locations to site Energy from Waste facilities is a problem and is not adequately addressed. Currently sites for waste tend to be in industrial areas which are not very accessible in terms of energy transfer to public buildings and residences. Equally there are problems associated with locating waste facilities closer to these land uses. It may be the question of scale of facilities that needs to be assessed. For example, the strategy needs to clarify whether small energy from waste facilities are best, or whether large facilities are better? Perhaps illustrate how a biodigester can be retrofitted to a housing estate? If this is feasible and viable. Behavior change of residents and users also needs to be addressed for these schemes to be successful.
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		<ul style="list-style-type: none"> • Brent council would welcome a structure of how the Mayor's various 'green' strategies link together. • Brent Council welcomes a 'step pack' to decentralised energy opportunities. The Merton rule was pioneering and brought the need to green and sustainable energy to the political forefront, however there is a need to step back and look at low carbon technologies such as gas fired and in the future biomass CCHP/CHP and Ground Source Heat Pumps (GSHP). Micro renewable technology is not reliable enough. • Brent Council welcomes the dedicated centre of expertise for guidance and support on decentralised energy. • Brent Council would like to see detailed London Map outlining areas where NOx and PM10 levels are still low enough for biomass boilers to be installed. • Greater emphasis on CCHP and CHP rather than only referring to decentralised energy. • BREEAM is not mentioned (however is mentioned in the London Plan)
<p>5. London's homes: driving our energy future</p>	<p>Aims that all London homes be retrofitted with energy efficiency measures by 2030 and eradicate fuel poverty by 2030.</p> <ul style="list-style-type: none"> • Homes Energy Efficiency Programme (HEEP) • Mayor's Housing Strategy & 	<ul style="list-style-type: none"> • Brent welcomes the emphasis on retrofit which is reflected with a new policy in the draft replacement London Plan. Boroughs are expected to identify opportunities to reduce CO2 from existing stock and develop detailed policies on retrofitting. This is supported but needs a realistic assessment and identification of the resources required for such action. In particular, if Local Authorities are to take a stronger role in wide-scale retrofit,

	<p>beyond Decent Homes</p> <ul style="list-style-type: none"> • Low Carbon Zones 	<p>corresponding resources and skills will need to be developed and committed to the strategy.</p> <ul style="list-style-type: none"> • Has too strong an emphasis on housing and does not address flats. ESCO's will need to be established in delivering the Home Energy Efficiency Programme. • Broadly speaking the proposals set out in the consultation documents are welcomed. Having said that we support each of the actions outlined in the documents under policies 6&7, unless these are funded sufficiently there is a danger that expectations are being built up only to be let down. • A general concern is that in a period when we know that public sector funding is going to be cut post the election, all three major parties have announced this to varying degrees, the expectations that councils will be able to match fund the measures outlined in the consultation is going to place a real burden upon us, and may not be realistic. • Unless we prioritise this as an area, we are likely to miss out on the funding, case in point is the work we did with Planning/Environment on Low Carbon Zones bid, and I led on the CESP which have both not achieved any additional funding. • Another other concern is the proposal to deliver retrofitting through the Mayor's housing strategy. The final version of the Housing strategy only came out this week, and there has been insufficient time to digest it thoroughly. It is unclear whether there is a proposal to leverage additional funding into the delivery of mitigation proposals. If this is not the case then there will be concerns over the re-direction of the funding from building homes,
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		<p>and this needs to be considered in detail.</p> <ul style="list-style-type: none"> • Also, how is the provision of energy advice going to be delivered ensuring that plethora of advice already available is not being duplicated or the recipients are the same? Will the Mayor being the strategic co-ordinator?
<p>6. Cutting costs and carbon in London's workplaces</p>	<p>Aim to make London's workplaces the most energy efficient in the world</p> <ul style="list-style-type: none"> • Buildings Energy Efficiency Programme (public sector buildings) • Better Buildings Partnership • Green500 	<ul style="list-style-type: none"> • With regard to commercial buildings (the largest energy consumer) the suggested actions are primarily on a policy and penalty basis, educating businesses so that they know which measures to put in place. The onus here is on the businesses themselves to pay for capital investment in the technologies. In the current economic climate, resources may be scarce upfront in this way and may reduce the uptake of such investment • Audits of buildings are suggested as support to businesses. Heating and lighting are already known to be the largest contributors to consumption. Suggest that standard guidance of suggested measures may reach wider audience (with the potential savings shown for each) and then it would just need auditors to look at a) feasibility and b) other measures. This would allow businesses to implement for themselves also. • BEEP ESCOs are stated to be involved in installation. Where is the funding responsibility for such installation? • The Council strongly recommends that BEEP funding is applied for to retrofit existing stock. Adequate resources in terms of staff time are required to ensure the programme is delivered. • Energy Efficiency support for SME's in London – Clarity on whether LA's are expected to deliver this?

		<ul style="list-style-type: none"> • Broadly agree with the mechanisms in place to cut carbon in London's work places however as stated in Chapter 3 an accreditation would be useful.
7. Building towards a zero carbon London	<p>Aim that by 2025 all new buildings be built to the highest energy efficiency standards</p> <ul style="list-style-type: none"> • Draft replacement London Plan • Mayor's Housing Strategy 	<ul style="list-style-type: none"> • The Mayor's policy for new development reflects the Government's statement on the reduction of CO2 emissions from new development. All new residential development is to be zero carbon from 2016 and all new non-domestic development is to be zero carbon from 2019. • The Mayor's energy policies are set out in the draft replacement London Plan which sets targets to minimise carbon dioxide emissions from major developments and all new major residential developments and non-domestic buildings will have to be zero carbon after 2016 and 2019, respectively. The council welcomes a clearer approach to non-residential buildings and energy targets than has been the case hitherto. • The Mayor's change in emphasis from renewables to greater flexibility on tackling climate change is welcomed. At times a tension has formed between meeting the Mayor's energy hierarchy (be lean, be clean, be green) and the 20% onsite renewables requirement. Brent supports an approach which seeks the greatest overall CO2 reduction. • With new development, the opportunity to reduce energy demand should not be under emphasised. The Mayor should seek to drive

		<p>down carbon emissions through sustainable design and construction and in particular promoting the highest standards of energy efficiency such as the PassivHaus standard. In light of the substantial costs in establishing Decentralised Energy the opportunity to also make CO2 emission reductions through energy efficiency measures should not be overlooked. The council would welcome further guidance from the GLA on maximising energy efficiency in new development.</p> <ul style="list-style-type: none">• The Mayor's proposals to produce 'low carbon cooling guide' is welcomed and demonstrates an integrated approach to the mitigation and adaptations strategies.• BREEAM is not mentioned (however is mentioned in the London Plan)• Funding for commercial projects through LCBP Phase 2 & CSEP is not mentioned in the funding stream.• Improvement to Approved Document L2A (new commercial buildings) L2B (existing commercial building)
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<p>8. Moving towards zero emission transport in London</p>	<p>By 2025, increase access to low carbon transport options</p> <ul style="list-style-type: none"> • Reduce need to travel, switch to public transport • Low emission vehicles & use of sustainable biofuels • Cycle Superhighways & 66,000 secure bike parking spaces • 100,000 electric vehicles 	<ul style="list-style-type: none"> • The Mayor’s strategy to promote public transport should include proposals to improve orbital public transport in outer London: in particular to better link town centres orbitally, and should be backed by appropriate funding. • The Mayor should consider further financial incentives to promote the use of public transport. • Council welcomes the £230 million to incentivise electric & hybrid cars. • The first tranche of policies in the Chapter 8 appears well aligned with the draft Mayor’s Transport Strategy (MTS), which was reported to Brent's Executive Committee in January 2010 in a report that encompassed the (draft) London Plan. • The Council welcomes Policies 10, 11 and 12 which emphasise a broad and overarching aim of minimising CO2 emissions which is anticipated to be delivered via a long-term shift towards the more efficient modes of transport, more efficient operation of transport and through the use of emerging technologies such as low(er) carbon vehicles, by embracing 21st Century technologies and cleaner fuels. • The document states that this will be achieved through existing GLA/TfL programmes, namely ‘<i>Creating a Cycling Revolution</i>’, ‘<i>Making Walking Count</i>’ and ‘<i>Encouraging the uptake of less polluting vehicles</i>’. • Brent Council is in broad agreement with this approach - mindful
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		<p>of the economic downturn and the constraints on funding to launch new programmes and initiatives until economic conditions improve. Brent supports the “Policy to Action” strands which outline how these programmes will be delivered. These correlate and cross-reference well with the material that appears in the (draft) MTS document, reported to the Council’s Executive Committee, 18th January 2010.</p> <ul style="list-style-type: none"> • Brent Council suggests it is well placed to respond/facilitate delivery on these initiatives. Although beyond the direct control of the Council, Brent very much welcomes the fact that all new buses introduced to London’s bus fleet will be hybrid vehicles, by 2012. • As stated in the Strategy – the Council recognises that transport accounts for 21% of London’s total CO2 emissions. Of this portion, cars and motorcycles account for just less than half, or around 10% of London’s total CO2 emissions. Brent has a policy whereby it does not actively promote the use of motorcycles (predominantly due to the over representation of people killed and seriously injured on Brent’s roads using a ‘Powered-two-wheeler’). • The Council also manages the delivery of a package of measures aimed at reducing car dependency, such as officers dedicated to working with schools and workplaces across the borough and helping them develop robust and deliverable sustainable travel plans. Brent is a strong advocate of car clubs and car sharing, demonstrating that it is not “anti-car”, but also supporting initiatives that ‘reduce the need to travel’, whilst perhaps mitigating the need for a household to own and use a second, third or even fourth, private vehicle. It is suggested that increased
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		<p>levels of investment and support at a TfL/GLA and Central Government level are sought, for such initiatives, between now and 2025.</p> <ul style="list-style-type: none"> • Officers note that road freight accounts for a further 21% of the motor-borne proportion of London's CO2 emissions, illustrated in this document. Some parts of Brent do experience higher levels of freight movements/heavy goods vehicles (HGVs) than other parts. Particularly, Harlesden and Wembley, both of which sit upon part of London's 'Strategic Road Network'. The negative impact of freight on the roads is further compounded by the fact that 40% of Europe's largest industrial/business Park – Park Royal – lies within Brent's jurisdiction. The Council is represented and actively involved with the "West London Freight Quality Partnership", and has lobbied/campaigned hard via the GLA/TfL for better public transport in this part of the Borough over the years - with the overarching aim being to facilitate lower private car use and reduce congestion - but with limited success. • This results in HGV's adding to the general congestion within and around the Park Royal region as they attempt to access and leave the area. Morning and evening peak congestion is significant due to the significant level of private-car use associated with the thousands of people who work in this location. Add to that the fact it presents something of a strategic 'rat run' from the North Circular (A406) to Western Avenue (the A40), both TfL managed strategic roads (urban motorways) and it comes as little surprise that the A406 presents huge blight on the borough and leads to failure to meet air quality target as part of the Council's Air Quality
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		<p>Management Action Plan, particularly during humid/hot parts of the year.</p> <ul style="list-style-type: none"> • Finally, in town centre locations, HGVs and smaller ‘white van’ type vehicles can actually compound localised congestion and pollution due to a lack of space for formalised loading/unloading bays or suitable rear servicing provision. This leads to freight vehicles parking outside retail premises in the daytime and congesting the highway. In Brent, this regularly happens in locations such as Harlesden that have a majority of independent retailers, often lacking in logistical planning/guidance from head offices. • Brent Council suggests that the document could afford consideration on the effects of HGV’s loading/unloading, and the effect this can have on traffic flow, congestion and associated localised pollution/CO2 emissions. With this in mind, the Council welcomes the comments regarding the need for a more efficient use of rail or water for freight purposes, as opposed to the highways network. However, it is also noted that “End note XI” states “Eighty-nine per cent of freight is lifted by road <u>and is likely to remain so</u>, due to fragmentation of supply chains, for example ‘just-in-time’, internet shopping and door-to-door delivery”, which does not foster a great deal of confidence in the text which appears earlier in this section. • Brent Council welcomes and supports the principle of Electric Vehicles and the need to expand the supporting infrastructure in anticipation of consumer take-up of these vehicles, which is widely anticipated from 2011 onwards. We do not have any significant concerns or questions relating to the aspirations or principles
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		<p>presented on this matter in the document.</p> <ul style="list-style-type: none">• The Council acknowledges that the technology is proven to have a significantly reduced 'Well to Wheel' carbon footprint/CO2 emissions than traditional fuels - such as petrol and diesel - and is the most appropriate of the 'emerging technologies' to embrace and support on a larger scale, both in London and beyond.• The Council is actively involved on the TfL/London Council's "Electric Vehicle Core Delivery Group", which is assisting in the development/delivery of electric vehicle charging infrastructure across London. Indeed, the Council was one of the first to install a 'kerb-side' charging point in the Borough, number of years ago. Looking forward, Brent has identified funding for three new (trial) publically available Electric Vehicle Charging Points (EVCPs) in the borough, for 2010-2011.• It has been broadly acknowledged by the GLA/TfL that there is lack of public confidence and information about the increasing product range of electric vehicles that are becoming available to the consumer. Issues of particular note are the more technical aspects of these vehicles such as charging abilities and supporting infrastructure, and more pertinently, the range of these vehicles. Such issues are perhaps more easily and successfully overcome through marketing campaigns at a central/London Government level as opposed to a local authority level.• Brent Council also supports the general consensus held by the GLA that there is a need to encourage (Central) Government to take active steps towards ensuring a standard towards electric charging infrastructure, in order to ensure access to, and interoperability
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		<p>between, charging points across the UK.</p> <ul style="list-style-type: none"> • Reducing the need to travel is quoted in Policy 10 although it is not clear how this will be achieved or even if the strategy would have any influence • Figure 8.2 – suggest that car and motorcycle emissions should be split as car makes up 37% of journey whilst bike only makes up 2% • There is no distinguishment between single and multiple occupancy car use • There is no consideration of aviation • Table 8.1 - No penalties for negative travel choices are defined or incentives for positive ones. The cost of car travel in the capital (excluding congestion charging) is roughly equivalent to public transport. With planned refurbishment, the cost of public transport is likely to rise resulting in a disproportionate financial cost to the environmental one <p>Section 10 – suggest more frequent monitoring may be required. This could serve as a publicity tool to encourage take up of initiatives</p>
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Setting an example through the GLA group	The GLA group will take the lead on reducing CO2 emissions. It will set an example for the rest of London's public sector, with energy efficient buildings, using low carbon transport options, and stimulating demand for low carbon products and services through its purchasing decisions.	
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