

London Sustainable Development Commission (LSDC)
Consultation submission on the Draft Climate Change Mitigation and Energy
Strategy, April 2010

1. Introduction

1.1 The London Sustainable Development Commission (LSDC) was established in 2002 to advise the Mayor of London on ways to make London a sustainable, world-class city. The Commission is an independent body advising, supporting and challenging policy makers to promote a better quality of life for all Londoners, both now and in the future, whilst also considering London's wider global impacts.

1.2 The LSDC is grateful for the opportunity to comment on the draft Climate Change Mitigation and Energy Strategy (CCMES). As a 'critical friend' to the GLA, the LSDC has an important role in promoting sustainable development in London and advising on the sustainable nature of London wide strategies.

1.3 There are many topics covered by the strategy where the drafting has taken forward policies and proposals that the LSDC is able to support. These are referenced in the main body of this paper. There are also some areas of concern identified in this paper although the Commission does recognise that this is a first draft and that it is inevitable that some of the detail will not be there yet. The Commission would therefore be happy to be involved in further iterations of the strategy.

1.4 The Commission would particularly like to thank GLA officers for a very helpful presentation explaining the main points of the strategy and being responsive to the Commissioners' questions and points of clarification at their meeting on 19th March. The LSDC has identified some areas where it could be of particular help such as Small and Medium sized Enterprises (SMEs) and behavioural change.

1.5 We would be happy to meet with your team to discuss these comments and issues further and look forward to hearing more about any amendments to the proposals. We would also welcome the opportunity to have a wider discussion with the GLA on how the LSDC may be able to assist in the development of further sustainable options and policies for London on climate change mitigation.

2. Overarching points

2.1 Efficacy

2.11 On the efficacy of targets and trajectory of expected actions, the Commission has yet to gain a sense of the snowball effect and sequence of actions, which the Mayor expects to take place as a result of the strategy. Currently it is hard to discern how, over time (perhaps during each Mayoral term and / or the national Carbon Budget periods), the role and contribution of different players and sectors will start to make the strategy work.

2.12 This also influences the effective monitoring of the strategy because without clear expectation of what can and should be being done by various sectors and by when, the

Mayor cannot know which levers to pull if, for instance, one sector fails to deliver or one exceeds its role and in doing so creates space for others to follow suit.

2.13 Some actions will be achievable earlier (e.g. workplaces) and others such as retrofitting and changes in behaviour are likely to take longer and / or require special effort (e.g. housing). Since some of the longer term changes are going to be among the most important, it would be useful to have a clearer idea of the expected timetable for implementation so that it can be seen what slippage in an area could mean.

2.14 The strategy appears to concentrate on monitoring and evaluation i.e. the process rather than addressing the steps needed to put right. (See above)

2.2 Current Economic Climate - 'recovery starts here'

2.21 The LSCDC feels that the recession does not seem to have been taken into consideration in the strategy. The strategy needs to be rooted in reality yet currently the strategy is written as though recession has not occurred and yet the downturn is the backdrop against which the strategy will need to be turned into practical action and delivery. The Commission's view is that the strategy cannot wait for economic recovery; indeed it should be central to the recovery plan and not an adjunct. Neither can it be based on the hope that all investment and other actions will fall into place when recovery occurred. This is for two reasons: some aspects of the recovery may work against proper action on climate change because they are rooted in ways of operating which directly or indirectly add to the problem rather than solving it; and, secondly, how society changes given a likely spending squeeze and a possible hardening of attitudes will affect the way the strategy can be delivered. This is a real test of joined up integrated sustainable development. The Commission's view is that this strategy should be part of the narrative and action for economic recovery, which starts now and not in a year or so when recovery has happened.

2.22 The strategy will need to be delivered by the whole economy not just a specific green economy. Indeed, if the aim to reduce emissions is to be achieved at the percentage rates aimed for, by definition the majority of the economy will be affected / involved. A whole economy approach is therefore required and the strategy needs to be certain that the various initiatives do the job sufficiently in light of the recession.

2.3 Is it a plan for recovery and jobs?

2.31 The skills which are needed to effect recovery appear to be missing from the strategy which also does not reflect all that has gone on before such as enforcement of building regulations (which could be an effective intervention), investment, procurement, efficiency, industrial policy etc. This should be picked up either within this strategy and/or the Economic Development Strategy.

2.32 Creating jobs – The LDA skills programme is about creating jobs for the workless. This does not fit that tightly with delivering a low carbon economy, which needs to focus more on further training for the already skilled workforce and attracting them to work in London. The strategy needs to be careful of forcing an unhelpful alignment of the two objectives. In terms of public procurement and planning for climate change mitigation measures new skill sets are also needed and these are not highlighted in the strategy; again, this needs to be part of the recovery starts here approach described above.

3. Detailed points

3.1 Targets

3.11 The targets are ambitious and we support them. The Mayor will want to pay regard to London's important leadership role in climate specifically and in sustainable development more generally and as such we recommend attention to the Climate Change Committee's recommended targets, which are slightly higher than those currently adopted.

3.12 Consistent with the whole economy approach mentioned above it would be useful to have a clearer idea of the contributions each of the actions proposed are likely to make to the targets for each sector. Information on the assumptions for the targets and figures in the report would be useful in order that the Commission can comment further.

3.13 The strategy states that the Mayor will work with others to keep the options of road user charging and regulatory demand management measures under review. However, the LSDC suggest further serious consideration of such measures may be necessary to meet the CO₂ targets and allow London to comply with EU Air Quality limits in the necessary timescale.

3.14 The government has set a target of all new developments to be zero carbon developments by 2016. It is debateable whether this is going to be met in London. This strategy could identify what needs to be done to achieve this objective and what are the barriers to its attainment.

3.15 The Commission is interested to know if there will be a micro-generation target in the next iteration of the plan, especially now that the fit looks much healthier. If so, the strategy should ensure that this is part of a whole house retrofit approach to ensure that London does not end up with PV on roofs of buildings which also have no draught proofing.

3.16 It would help if the balance between the compulsion versus voluntary aspects of the strategy were set out. The Commission would like to see this more clearly explained including which stakeholders these measures would affect e.g. what compulsion is there for boroughs to take on board the CO₂ targets?

3.2 Data Sources

3.21 A current area of inconsistency between the draft CCMES and draft Mayor's Transport Strategy (MTS) is the data source of current CO₂ emissions. The draft MTS uses a forward projection of 2004/05 survey data to estimate 2006 emissions, the same data as the Climate Change Action Plan of 2007. The current draft CCMES uses data from a 2006 survey. The draft CCMES states the intention to move to 2008 survey data for the public consultation draft. The Commission would like to see consistency in data sources between strategies, to enable meaningful comparison over time. In addition the draft MTS does not provide interim transport CO₂ targets or detail the projected trajectory of change. However, figure 8.4 in the CCMES does provide a projection of transport related CO₂ emissions to 2025. Again the Commission would like to see consistency.

3.22 The CCMEs applies the scenario of extended Government action across all three CO2 emissions sectors of homes, workplaces and transport. The resulting projection of London's total CO2 emissions in 2025 is a 57% reduction from 1990 levels. The Commission would like to see further detail on how the extra 3% will be met to reach the 60% by 2025 target.

3.23 The strategy appears to have taken a carbon budget approach similar to the CCAP. However the pie charts, which were very useful in the original CCAP, are missing from the new strategy.

3.3 Behavioural Change

3.31 The Commission feels that some of the behaviour aspects are weak in the strategy and would benefit from being strengthened. There appear to be great assumptions behind the approach taken in terms of the numbers of population engaged in programmes mentioned. Behavioural change is hard to achieve (especially if the media gives undue attention to the sceptics) and requires consistent and persistent approaches and support and this needs to be taken into consideration. The Commission is keen to offer further help and advice in this area.

3.32 The LSDC is also unsure as to whether the strategy has factored in future price rises in energy costs which will help change demand and behaviour.

3.4 Cross Border Issues

3.41 The Commission would also highlight that climate change is not just a London level issue and has cross boundary effects. The Commission would like to see clarification on the Mayor's relationship with the rest of the south east of England, particularly around the issue of airports. Many aspects of policy and delivery of the strategy cannot be dealt with without proper cross border cooperation especially with the East of England and South East England regions.

3.42 The strategy should also set out a plan for manufacturing and what this will look like in London in the future. This would require joined up thinking on mitigation with the Mayor's approach to industrial and locational policy including the skills and supply chain agenda, alongside the above mentioned need for cross border cooperation at least with East and South East England.

3.43 The Commission feels that the effect on global emissions is missing from the strategy – particularly the embodied energy of consumption based emissions. The Commission recently published with BioRegional "*Capital Consumption: the transition to sustainable consumption and production in London*"¹. This report, which was published in the run up to climate negotiations in Copenhagen, examines the full extent of London's carbon dioxide emissions when including those from imported goods consumed in London. The report also illustrates how adopting measures to reduce consumption based carbon emissions could also help create jobs, build a more resilient economy and benefit the health and social well being of Londoners. The Commission would like to see the next iteration of the report addressing issues raised in the *Capital*

¹ <http://www.londonsdc.org/lcdc/research.aspx>

Consumption report at least as an important emerging issue to note and return to as part of the 'snowball trajectory' and monitoring work mentioned above.

3.5 New Technology

3.51 When presenting to the Commission GLA officers mentioned that a study on renewable technology contribution is being commissioned. The Commission feels that it is important that this is factored into the next version of the strategy along with associated costs.

3.52 Regarding Low Emission Vehicles, the Commission feel that the full energy demand aspects should be considered properly in relation to off-setting emissions to the grid. In addition concerns around equality issues remain around the positioning of recharging points in predominantly wealthy areas of the capital.

3.6 New Initiatives

3.61 The informal sector and stakeholders and what they are doing present a huge opportunity for alignment of an array of initiatives and aspiration as part of this strategy and the economic recovery, as mentioned above. There are many excellent community initiatives already in existence tackling climate change mitigation and the Commission would like to see the CCMES connecting more with existing community based programmes and supporting their continuation rather than duplicating effort.

3.62 This is also necessary to avoid the danger of allowing a proliferation of initiatives – which can be confusing to those they are targeted at. The Commission would like to see a reappraisal of initiatives and delivery organisations in London, as this would help in testing the efficacy of the strategy and the snowball effect mentioned above.

3.7 Financing

3.71 The financing of the plan is mentioned as £60 billion. It is unclear where this funding will come from. There is a real risk of failure if insufficient effort is put into delivering the strategy. It is unclear what the GLA will provide in terms of support (for e.g. pump priming). Of the £60 billion required to deliver the target overall £17 billion appears to be from the GLA. The Commission understands that the GLA is committing so far, over £100 million over 3 years on direct climate change programmes, with a further £100 million leveraged from Government and the private sector. Whilst the strategy is not a delivery plan given likely cuts and spending squeezes elsewhere and the need to give some confidence that the strategy is deliverable, the Commission would like to know if any of this funding is now at risk and where the remaining funds will be obtained.

3.72 It would also be helpful to know if the GLA has carried out any kind of 'marginal abatement cost' work. Housing appears to be under-represented relative to that sector's emissions, costs for abatement and the need for assistance.

3.73 There are some well-known barriers to delivery (e.g. lack of parking etc) that have prevented London from getting its fair share of e.g. CERT spend. It now looks as though London will be failing again to get its fair share from the micro-generation funding available for similar barriers. What can be done to identify and remove these barriers to delivery?

3.74 Development of finance mechanisms – are there any plans to use e.g. Jessica or London Green Fund as a revolving fund to support Pay As You save etc?

3.8 Other Specific Aspects

3.81 SMEs are notoriously hard to crack and get on board in terms of climate change. The Commission feels that more needs to be in the strategy about how this difficult sector will be tackled and what measures along with the Economic Development Strategy (EDS) are in place to address the SME contribution to climate change mitigation. The Commission is keen to offer further help and advice in this area.

3.82 The strategy is very light on the contribution that water efficiency can make in reducing energy consumption and therefore carbon emissions. The Mayor's Water Strategy explains the link between carbon and water. The second largest contributor to carbon emissions from homes is heating water, which accounts for 27% of a home's carbon emissions. The use of water in homes for activities such as personal use and household washing, cooking and cleaning (excluding water used in heating the home) contributes 35 million tonnes of greenhouse gases each year. This is seven times as much as that emitted by the water industry and amounts to 5.5% of total UK emissions. Using water more efficiently in homes could reduce this significantly and save money on water and energy bills. The Commission recommends that the strategy should reflect the importance of water efficiency in tackling climate change, including retrofitting homes for water as well as energy. The strategy should align work on energy and water efficiency, with cooperation across utility companies and with the GLA giving real benefit.

3.83 The Commission believes that the London Energy Partnership (LEP) is no longer functioning and is keen to hear what is in place to replace the LEP and continue the ongoing dialogue with stakeholders. Since it is clear that the journey is long and the Mayor will need to work in partnership, how is the Mayor proposing to work with the broad church of other actors, similar to that work being conducted by the London Climate Change Partnership for adaptation?