
The Low Emission Strategies Partnership

The Low Emission Strategies Partnership (www.lowemissionstrategies.org) was established in 2007 to disseminate good practice in reducing transport emissions of toxic air pollutants and greenhouse gases. The Partnership specifically seeks to accelerate the deployment and penetration of low emission transport fuels and technologies. This is achieved by supporting local authorities to adopt and implement low emission policies, strategies and measures.

Phase I of the LES programme established 18 'peer group' projects across 15 local authorities, providing expert advice and sharing best practice. The Partnership also produced a guidance document '*Low Emission Strategies: Using the planning system to reduce transport emissions*'. An updated draft of this document has progressed to the final stages of approval with a view to publishing it on the Defra website as a joint Defra and LES Partnership guidance report. Funding has been secured for Phase II, which will run from November 2009 to March 2011, building on progress made during the first phase.

The Partnership Board comprises representatives from Greenwich, Hillingdon, Sefton, Sheffield, Wigan, Mid-Devon and Leeds Councils and Cenex (www.cenex.co.uk). The wider partnership also includes the City of London Corporation and the London Boroughs of Croydon and Wandsworth. The work is funded by grants from Defra and CLG in combination with significant match/in-kind funding from participating organisations.

Consultation response

The LES Partnership Board welcomes the opportunity to comment on the Mayor's draft Air Quality Strategy, *Clearing the air*¹. This consultation response focuses on the central interest of the Partnership to date, specifically, the mitigation of transport emissions through the planning system². The London Local Authorities that are involved with the Partnership have indicated that they may also respond separately to the GLA regarding the wider implications of the draft Air Quality Strategy.

Key recommendations

1. Go beyond 'air quality neutral developments', by supporting local authorities and developers to seek 'low emission developments'.
2. Emphasise the potential role for reducing transport emissions (as well as emissions from stationary sources) through the planning system.
3. Include reference to the LES Partnership / Defra guidance document, '*Using the planning system to reduce transport emissions*'.

¹ Greater London Authority (October 2009) *Clearing the air*, The Mayor's draft Air Quality Strategy for consultation with the London assembly and functional bodies. Accessed online at: http://www.london.gov.uk/mayor/environment/air_quality/index.jsp

² During Phase II of the LES Programme, the Partnership will retain a strong emphasis on land use planning, but also expand the scope of the work to consider low emission strategies for transport planning and local authority procurement. The Partnership would therefore be very interested in working closely with the GLA on initiatives such as the Electric Vehicle Delivery Plan.

Rationale for response

As defined by the Partnership, a *Low Emission Strategy* provides a package of measures to help mitigate the transport impacts of development. The primary aim is to reduce transport emissions by accelerating the uptake of low emission fuels and technologies in and around a development site. Low emission strategies may address both the construction operational phases of a development. They can also complement other design and mitigation options, such as travel planning and the provision of public transport infrastructure.

Strategies may be secured through a combination of planning conditions and legal obligations (section 106 agreements). They may incorporate policy measures and/or require financial contributions to the delivery of low emission transport projects and plans. For example, typical operational phase measures include emission based parking policies, investment in low emission infrastructure, fleet emission improvement, low emission procurement and supply chain initiatives and contributions to local transport projects and strategic monitoring.

In reducing transport emissions, low emission strategies improve local air quality and reduce greenhouse gas emissions associated with climate change. They also contribute to local government performance targets, provide local economic benefits, help to streamline planning decisions and contribute to wider sustainable development goals. The LES Partnership is therefore of the view that the Mayor's Air Quality Strategy should provide reference to and encourage adoption of the Low Emission Strategy approach.

Detailed changes requested

POLICIES 1-4

The LES Partnership Board supports the measures that are included within Policies 1 to 4 to encourage the use of sustainable transport and to increase the uptake of low emission vehicles.

However, Policies 1 to 4 do not provide local authorities with many options for the *implementation* of transport measures. As such, the Board recommends the following change:

- Within the text relating to Policy 2, include reference to the LES Partnership / Defra Guidance document, "*Low Emission Strategies: Using the planning system to reduce transport emissions*".

POLICY 8

The LES Partnership Board supports the 'vision' and the 'policy goal' set out in Policy 8, to the extent that the minimum requirement for a new development should be that it does not cause London's air quality to deteriorate. However, the Board believes that the GLA should go further in supporting local authorities and developers to seek 'low emission developments' through best practice in the management and mitigation of emissions, such that air quality in London *improves* (and greenhouse gas emissions are reduced). Low Emission Strategies provide an established mechanism for achieving this.

Furthermore, Policy 8 is currently located within a chapter on 'non-transport measures', whereby the focus is on actions relating to stationary sources. The Board believes that the potential for reducing transport emissions through the planning system should be emphasised more strongly, through reference to the Low Emission Strategies approach.

As such, the Board recommends the following changes:

- Revise the 'vision' and the 'policy goal' such that an 'air quality neutral' development is perceived as the minimum requirement, and to support local authorities in seeking low emission developments. E.g. revise wording as follows:
 - VISION: "*A planning approval system that ensures that no new development has a negative impact on air quality in London, and that supports and encourages air quality improvements through the adoption of best practice in managing and mitigating emissions.*"

- FROM VISION TO POLICY: *"Proposed new developments in London should must, as a minimum, be 'air quality neutral', and should aspire towards zero/low emission developments through the adoption of best practice in the management and mitigation of emissions."*
- Include reference to the LES Partnership / Defra Guidance within Policy 8 and the supporting text, as a means of encouraging best practice in managing and mitigating transport emissions. E.g. include additional text within Policy 8 as follows:
 - FROM POLICY TO ACTION:
 - "The Mayor will use his planning powers to...*
 - *Encourage local authorities to refer to the LES Partnership / Defra Guidance document: Low Emission Strategies: Using the planning system to reduce transport emissions"*³.
- Expand Policy 8 and the supporting text, to clarify that transport emissions (from both the construction and operational phases) should be considered within the context of new developments⁴.
- Expand Policy 8 and the supporting text, to clarify that measures to mitigate transport emissions can be realised through the planning system.
- Review the case studies selected to demonstrate the application of low emission strategies, to include the following⁵:
 - The London Borough of Greenwich:
 - (i) The Post Office – fleet emission improvement;
 - (ii) Greenwich Peninsula – set minimum emission standards for vehicles entering development;
 - (iii) Greenwich Millennium Village – emission based parking policies;
 - (iv) The Warren – established a 'low emission zone' for the development, including construction and operation phases;
 - (v) Tripcock Point – site travel plan, funding for air quality monitoring;
 - (vi) Love Lane – range of transport (and non-transport measures).
 - Five Boroughs Group (Greenwich, Newham, Tower Hamlets, Hackney and Waltham Forest) – The 2012 Olympics – public transport provision, maximise use of Channel Tunnel rail link to reduce air travel, implementation of a low emission zone for the Olympic Park, low/zero emission Olympic fleet, active spectator programme for walking and cycling, carbon offset programme.
 - The London Borough of Croydon – Queens Hospital – financial contributions for air quality initiatives

The LES Partnership would welcome further discussion with the GLA on these, and related issues. We would be willing to advise on more detailed wording and provision of further case studies to support the policies outlined in our response.

³ Updated version of guidance forthcoming on Defra's website (December 2009)

⁴ Phase II of the LES Programme will include the development of a 'Low Emission Toolkit'. This will assist local authorities in determining the transport emissions associated with developments, and provide indications of the costs and benefits of various low emission strategies. This contract is currently out for tender and is due to report in June 2010. The LES Partnership would be keen to liaise with the GLA on the deployment and use of this toolkit.

⁵ Please refer to Annex A, for further details.

Annex A: Examples of Low Emission Policies, Strategies and Measures

(Ref: *Low Emission Strategies: Using the planning system to reduce transport emissions*)

1 THE POST OFFICE (Greenwich, 2000)

The development: Construction of a sorting office and vehicle depot in Greenwich.

Low emission strategy: So far as practicable and in order to minimise nitrogen dioxide and sulphur dioxide and particulate emissions to use reasonable endeavours:

- (i) to ensure the use of low sulphur diesel in the owner's fleet of vehicles at the development;
- (ii) to fit particle abatement technology to diesel vehicles when it becomes reasonably practicable;
- (iii) to conform with statutory guidelines and recommendations (originally from Department of Environment, Transport and Regions, which no longer exists); and
- (iv) to comply with European Union emissions standard banding stage 3 by the year 2004.

Legal costs: The agreement also requires 'the owner to pay the council's reasonable legal costs in connection with the preparation of this Deed in the sum of £2500.'

2 GREENWICH PENINSULA (Greenwich, 2004)

The development: 'Over the next 15 years, the new riverside community, with homes for 20,000, and workplaces for 24,000, alongside places to eat, shop, and relax, will attract people from all over the capital.' (www.GreenwichPeninsula.co.uk)

Low emission strategy: agreed (via 106 agreement) on 23rd Feb 2004. It sets minimum euro-standards for the majority of vehicles entering the development site. The transformation is achieved via a combination of parking controls and low emission agreements as shown in the table below.

Review clause: The agreement includes the following review clause: The developer to 'at the dates set for periodic review, to submit to the council for approval a review of the operation of the low emission zone, including the low emission zone controls over the preceding period and proposals for the following period shall use all reasonable endeavours to obtain the council's approval thereto.'

Sector	Euro	Compliance*	Mechanism
Residential (affordable)	3	2009	Euro based parking charges, with cut off 2013
Residential (private)	4	2009	Euro based parking charges, with cut off 2013
Visitors	n/a	-	No emission based controls
Taxis	3	2010	Reasonable endeavor by developer and TfL
Coaches	Eq.TfL	2010	Reasonable endeavor by developer
Offices	4	2009	Parking controls on tenant parking
Management company	4	2009	Plus reasonable endeavor to attain highest Euro Std
Hotel patrons	2	2010	Plus incentives for meeting Euro 4 by 2009
Waterfront transit	-	-	'expected to be of the highest Euro Standard'
HGVs/construction	-	-	80% Euro II plus RPC up to 2007

*Compliance by date indicated or 36 months after completion/opening, whichever is the earlier.

3 GREENWICH MILLENNIUM VILLAGE (Greenwich, 2006)

The development: Greenwich Millennium Village is the first of the Government's Millennium Communities. It covers 72 acres of the Greenwich Peninsula, and is grouped into communities arranged around a village

green and newly created lake. The development comprises almost 3000 homes plus significant commercial space (www.greenwich-village.co.uk).

Low emission strategy: The strategy applies to all vehicles using the car parking facilities within Greenwich Millennium Village (sections 1C, 1D and village square). It stipulates emission based parking charges, which incentivise vehicles which are A-banded for CO2 and also those which are Euro 4 compliant.

4 THE WARREN, ROYAL ARSENAL (Greenwich, 2006)

The development: Royal Arsenal, Woolwich, exemplifies a mixed urban development and forms part of an entire regeneration of a historic riverside location in London. Ultimately, the 76 acre site will form a new neighbourhood in London. This mix of commercial, residential and leisure facilities will be complete by 2015 (www.royal-arsenal.co.uk).

Low emission strategy: The agreement requires the developer to submit to the council for approval details of a 'low emission zone' and 'low emission zone controls'. The low emission zone must aim 'to prohibit the most polluting vehicles within the development scheme while promoting the use of the cleanest vehicles.' The agreement goes on to outline more detailed provisions to be included for both construction and operational phases of the development. The latter includes measures to manage emissions from both commercial and residential vehicles using the site.

For the operational phase, 'reasonable endeavours' are required to ensure that commercial vehicles comply with Euro 5 by 2012 (plus a 'target quota' complying with Euro 6). For residential vehicles, the emphasis is on using parking controls to reduce carbon dioxide emissions. A combination of measures are suggested, which include parking permits, car share schemes, car clubs and information provision. The agreement also includes provision for the developer to purchase, site and operate an air quality monitoring station to operate until 10 years after completion of the last residential property.

5 TRIPCOCK POINT (Greenwich, 2006)

Low emission strategy: The owner is required, prior to implementation, to submit to the council for approval a low emission strategy. The strategy should seek 'by a variety of means to manage construction emissions and to encourage, educate and advise the occupiers of the dwellings with regard to low emission standards from private motor vehicles.' The strategy is to identify methods of reducing emissions which shall include:

- (i) use of public transport; and
- (ii) measures to encourage occupiers to purchase motor vehicles that meet low emission standards.

More detailed provisions lay out requirements of the strategy to manage both construction and operational phase emissions. For the operational phase, 'reasonable endeavours' are required to 'actively promote low emission travel behaviour' amongst residents, employees, visitors and suppliers entering the site. The prime mechanism of doing this will be the site travel plan with its associated travel plan coordinator. The agreement also includes provision for siting of an air quality monitoring station and for financial contributions to support its installation and operation (£160k).

6 LOVE LANE, WOOLWICH TOWN CENTRE (Greenwich)

The development: Major mixed use scheme comprising 960 residential accommodation, community and/or offices, retail store, retail, food and drink units, as well as 1,172 parking spaces and cycle parking. The whole borough is an Air Quality Management Area for nitrogen dioxide and particulates. Woolwich town centre has good Public Transport, Accessibility Level of 6 (PTAL=6).

Low emission strategy:

- (i) *Construction phase measures:* approved method statement required, to include: monitoring to targets, regular report, and adherence to available best practice (e.g. Mayor's Best Practice Guidance).

- (ii) *Transport measures*: Provision of a car club; emissions based charging for 500 residential parking spaces (annual charge ranging from £0 to £300 depending on VED banding); Controls on parking permits and transfers; Provision of ten electric vehicle charging points within the residential car park, 50% of delivery vehicles and 50% home delivery vehicles to meet Euro 5 rating by store opening and to be using bio-fuel (plus 100% within 5 years).
- (iii) *Additional non-transport emissions measures*: 10% renewable energy commitment; BREEAM excellent rating, CHP plant including community heating;
- (iv) *Monitoring contribution*: £16,000 per annum for ten years towards Greenwich Council's environmental monitoring;
- (v) *Reporting*: Low emission zone implementation report required at time of store opening and subsequently after five and ten years respectively.

7 THE OLYMPICS (London, 2012)

The plan: A plan has been drawn up to ensure that the 2012 Olympics are as sustainable as possible. It covers five key themes: waste, climate change, biodiversity, inclusion and healthy living. The Sustainability Plan looks at all stages of the project, from preparation for the Games, staging the Games and planning for after 2012. Managing transport impacts is a priority, which runs through all stages.

The Olympic bidding document outlined the following key transport measures:

Key measures:

- (i) 100% public transport for spectators;
- (ii) Maximise use of the Channel Tunnel rail link to reduce air travel;
- (iii) Implementation of a low emission zone for the Olympic Park;
- (iv) Procurement of a low/zero emission Olympic vehicle fleet;
- (v) Active spectator programme for walking and cycling; and
- (vi) Carbon offset programme for all Olympic travel.

The Low Emission Zone: The Olympic Park will be designated as a Low Emission Zone (LEZ) during the Games:

- (i) The Olympic Park LEZ will permit entry only to vehicles less than five years old and that meet best practice noise and emission standards;
- (ii) LEZ criteria will also be set for fleet contract specifications, thereby extending the benefits of reduced emissions and noise across all Olympic venues and facilities;
- (iii) Air and noise pollution impacts of demolition, site remediation and construction will be reduced by following the London Code of Construction Practice.

Work is underway to develop and implement these measures. Plans include a stronger focus on carbon dioxide emissions in tandem with air quality (further information: <http://www.london2012.com/contact-us.php>).

8 QUEEN'S HOSPITAL (Croydon, April 2005)

The development: Redevelopment of Queen's Hospital site to provide 360 dwellings and a meeting hall.

Low emission strategy: Agreed via 106 for the developer to pay £12,600 for 'air quality initiatives within the administrative area of the council, which are of benefit to residents living in the development'.

Monitoring costs: 'Upon completion of this Deed the Owner shall pay the Council the sum of £1000 as a contribution towards the cost of monitoring this agreement.'

Legal costs: 'The owner shall pay the Council's reasonable legal costs for the preparation and completion of this Deed upon the date of this Deed.'