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Dear Sir/Madam

Consultation Response on: Natural Environment White Paper Discussion Document by the Low Emission Strategies Partnership Board

Please find enclosed a consultation response from the Low Emission Strategies Partnership Board relating to the Discussion Document for the Natural Environment White Paper.

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 Board includes representatives from London Borough of Greenwich, Sefton Metropolitan Borough Council, London Borough of Hillingdon, Sheffield City Council, Wigan Metropolitan Borough Council, Mid-Devon District Council and Leeds City Council.

If you require further information, please don't hesitate to contact me.

Yours faithfully,

Gary Mahoney
Acting Chair of the LES Partnership Board

Low Emission Strategies Partnership Board: Response to Natural Environment White Paper Discussion Document



(29 October 2010)

1 Introduction

The Low Emission Strategies Partnership

- 1.1 The Low Emission Strategies (LES) Partnership welcomes the opportunity to provide a submission to the Department for Environment, Food and Rural Affairs on the Discussion Document for the Natural Environment White Paper.
- 1.2 The LES 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.
- 1.3 Phase I of the 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 been published on the Defra website as joint Defra and LES Partnership Good Practice Guidance¹. Grant funding has been secured from CLG and Defra for Phase II, which runs from November 2009 to March 2011, building on progress made during the first phase.
- 1.4 The Partnership Board includes representatives from London Borough of Greenwich, Sefton Metropolitan Borough Council, London Borough of Hillingdon, Sheffield City Council, Wigan Metropolitan Borough Council, Mid-Devon District Council and Leeds City Council.

2 Consultation Response

- 2.1 The LES Partnership Board welcomes the Discussion Paper and the acknowledgement of the intrinsic value of natural resources and systems. The LES Partnership has a specific interest in improving air quality and in reducing greenhouse gas emissions that cause climate change. The following text outlines our responses to some of the specific questions posed.

Question 1: What do we need to do to embed the true value of our natural resources in decision making at all levels?

R1: The LES Partnership urges Government to develop and support evidence-based assessment that will quantify impacts on the natural environment, and lead to an understanding of the true value of natural resources.

- 2.2 Recognising the true value of natural resources is crucial in making decisions at a local and national level. The LES Partnership strongly endorses an evidence based approach to the reduction of transport emissions. This includes decisions made within local authorities as regards their own fleets, as well as through planning decisions, the local policy framework and area wide activities. (See response to Question 9c.)

¹ LES Partnership / Defra (January 2010) Low Emission Strategies: Using the planning system to reduce transport emissions. Good Practice Guidance. Available to download at:
<http://www.defra.gov.uk/environment/quality/air/airquality/local/guidance/documents/low-emissions-strategies-2010.pdf>

Question 2: Have we identified the right overarching challenges for the White Paper to consider?

a. If not, what should we focus on?

b. How should we approach these challenges?

R2: Include consideration of incremental (or cumulative) impacts, e.g. cumulative air quality impacts of separate developments on air quality in the local area.

2.3 The discussion paper indicates that the three overarching challenges for the White Paper will be: (i) Climate Change; (ii) Demographic Changes; and (iii) Incremental Changes. These are all significant issues.

2.4 Under 'incremental changes' the text of the discussion paper focuses on incremental changes observed and predicted within the natural environment. The paper should also consider incremental changes within the built environment, which impact upon the natural environment. For example, the cumulative air quality impacts of new development is not well addressed by existing legislation which measures significance of impacts of single developments on air quality concentrations across a broader area. The LES Partnership is of the view that air quality should be treated in the same way as carbon, whereby all emissions to air are minimised at a new development site.

Question 3: What are the existing policies and practices aimed at protecting England's natural assets that currently work most effectively? What works less well – what could we stop doing or do differently?

R3: The existing Local Air Quality Management regime plays a valuable role in addressing the cross boundary issues raised in Question 9. It should also be refined to ensure strong support for action to reduce emissions.

2.5 The LES Partnership recently produced a discussion paper on Local Air Quality Management (LAQM)² in response to a review commissioned by Defra. The Partnership argues for recognition of the key role that emissions-based metrics could play at a local level in bridging the gap between concentration-based objectives and the actions required to meet them. Greater emphasis on emissions would provide a practical mechanism for LAQM to deliver significant contributions to health and environmental protection, thereby maintaining its importance and relevance within the wider context of UK air quality management. The paper makes the following recommendations:

- Local Authorities have a major role to play in driving down emissions and improving air quality in their local area. The biggest opportunities for local action come from integrated cross disciplinary working, with air quality practitioners adopting a facilitating/brokering role across authorities and with local stakeholders.
- The statutory duty placed on local authorities by the LAQM framework ('to work towards AQO compliance') is toothless and ineffective. This driver needs strengthening by: (a) aligning the outcome metric more directly to what local authorities can influence, and (b) by requiring 'achievement of' rather than 'progress towards' the agreed metric. It is likely that one or more emission based metrics can fulfil this role. This approach would enable logical links to existing AQ/CC national indicators, and also the new exposure reduction regime.
- LAQM faces significant communication barriers with a range of target groups including the public, senior officers/politicians and spatial/transport planners. We need to recognise the intrinsic complexity of the present LAQM framework and consider how to engage with these target groups on their terms and in their language, rather than demanding they learn the technical language of LAQM. The LES Partnership has demonstrated that argumentation based

² Low Emission Strategies Partnership: Response to a Review of Local Air Quality Management (September 2010). Available online at: <http://www.lowemissionstrategies.org/downloads/LAQM%20discussion%20paper.pdf>

more on emission reduction rather than concentrations is more intuitive, more engaging and above all delivers results.

- Nowhere are the benefits of emission based thinking stronger than in relation to linking up with climate change. It is time to consider a more fundamental realignment of LAQM to reflect the now dominant emission based climate change agenda.
- Planning based Low Emission Strategies provide one of the most important opportunities for concerted local action. They provide pragmatic solutions and help to avoid protracted adversarial planning battles. Good progress in being made on the ground, however more could be done by central government to support and encourage wider and more effective adoption nationwide.
- Overall, emission based thinking and low emission initiatives (be they planning based, transport plan based, procurement strategies or area wide plans) have great potential to drive local action on air quality (and climate change). Options for explicitly recognising this shift through amendment or extension of the LAQM regime should be identified and actively explored.

Question 6: What best practice and innovative approaches to protecting and enhancing our natural environment do you think should be considered as we develop the White Paper?

- 2.6 The LES Partnership is run by local authorities coming together to pool resources and expertise to support best practice.
- 2.7 In reducing transport emissions, examples of good practice are set out within the LESP/Defra Guidance Document, and listed on our website.

Question 9: How best can Government incentivise innovative and effective action on the natural environment, across England, at the local level?

a. How best can local government and other local partners work together to improve local outcomes on the natural environment, and pursue a more integrated approach linking a healthy natural environment to economic prosperity, sustainable development and a better quality of life, health and wellbeing?

R4 Local level partnerships, such as the LES Partnership, could provide a means for local authorities to pool resources and to collaborate on environmental outcomes. Central Government has an important role to play in supporting the creation and development of such partnerships.

- 2.8 The Coalition Government seeks to increase the role for local authorities in protecting and managing the natural environment, and to reduce the level of top down intervention from Central Government. The LES Partnership provides an example of the *Big Society* in action. It is run by local authorities coming together to pool resources and expertise to support best practice.
- 2.9 The Partnership has grown as a result of annual grant funding from CLG and Defra, and through significant match and in-kind contributions from the partner Local Authorities. It is not clear whether either the financial or the in-kind support will be available following the Comprehensive Spending Review. The Partnership is currently working to review our financial model, under the new political landscape. We would be keen to work with Local and Central Government to identify practical and efficient mechanisms to continue to support local delivery.
- 2.10 Models similar to the LES Partnership could provide a means for local authorities to collaborate on approaches to environmental problems. Central Government should have a role and responsibility for supporting and actively facilitating the creation and evolution of local level partnerships. Support should be provided to ensure that cross boundary issues may be addressed and that the efficiencies of working together can be maintained and developed.

b. What are the most effective mechanisms for managing the natural environment where cross-boundary issues are involved, and making the link to other mechanisms for economic growth, transport and planning?

R5: *When realigning responsibilities between Central and Local Government, it is critical that cross-boundary issues are addressed. The White Paper should consider whether environmental issues represent a special case for the maintenance of centralised support and delivery mechanisms.*

- 2.11 The changes that the Coalition Government is seeking raise key questions around how to ensure that cross boundary issues are appropriately addressed. The challenge for new policy is to ensure that it fills the gaps left through removal of previous mechanisms.
- 2.12 In considering the right balance between the sharing of risks and costs between Central and Local Government, it is important to recognise that there are severe difficulties as regards European Air Quality Limit Values, in that it is rarely within the control of a single, or even a group of local authorities to ensure compliance. Air quality requires action and responsibility at all levels of government.

c. How best can the value of the natural environment be considered within local planning?

R6: *Support the use of Planning Obligations and the Community Infrastructure Levy (or equivalent future legislation), to secure transport emission reductions.*

- 2.13 The LES Partnership promotes the use of planning conditions and legal obligations (section 106 agreements and/or Community Infrastructure Levy, or equivalent future legislation) to reduce transport emissions at new developments sites. This is either through mitigation measures at the site itself, or via financial contributions towards the damage costs. The approach is set out in the LESP/Defra Good Practice Guidance, referenced above.
- 2.14 Some Partnership Authorities have incorporated this approach within their local policy framework, through Supplementary Planning Documents (e.g. London Borough of Greenwich, Mid Devon). These documents establish the funding formulae through which their respective planning authorities can recognise the emission costs of a new development. The Partnership is currently working with a number of other local authorities on incorporating this approach within their planning policy framework.
- 2.15 As part of this support, the Partnership is developing a template for the development of Supplementary Planning Documents. Using air quality grant funding from Defra, we have also commissioned the creation of a Low Emission Toolkit. The toolkit will include the following three components.

Technology Guidance: An easy-to-use comparative guide to different low emission vehicle technologies. Including emissions (PM₁₀, NO_x and GHG), performance, costs and logistics of low emission vehicle technologies at an individual vehicle level.

Fleet Management Tool: A tool for Fleet Managers, who will be able to input data on their own fleets and be provided with an assessment of the costs and benefits of procuring different low emission vehicles. Including emissions reductions (PM₁₀, NO_x and GHG), health impacts and associated marginal costs.

Development Tool: A tool for Planners and Environment Officers, to (i) assess the emissions (and associated health impacts) of a new development without low emission strategies; (ii) assess the potential monetary costs and benefits (in emissions and health impacts) from the implementation of various low emission strategies, including site based measures (both technological and travel plan measures) as well as off-setting, i.e. financial contributions to wider schemes; (iii) determine the residual emissions from the scheme (and their health costs) after low emission strategies have been implemented.

Question 15: If you could choose just one priority action for the Natural Environment White Paper to drive forward locally, nationally or internationally – what would it be?

2.16 Mechanisms to support local level partnerships in addressing cross boundary impacts.

3 Recommendations

- 3.1 The LES Partnership urges Government to develop and support evidence-based assessment that will quantify impacts on the natural environment, and lead to an understanding of the true value of natural resources.
- 3.2 Include consideration of incremental (or cumulative) impacts, e.g. cumulative air quality impacts of separate developments on air quality in the local area.
- 3.3 The existing Local Air Quality Management regime plays a valuable role in addressing cross boundary issues. It should also be refined to ensure strong support for action to reduce emissions.
- 3.4 Local level partnerships, such as the LES Partnership, could provide a means for local authorities to pool resources and to collaborate on environmental outcomes. Central Government has an important role to play in supporting the creation and development of such partnerships.
- 3.5 When realigning responsibilities between Central and Local Government, it is critical that cross-boundary issues are addressed. The White Paper should consider whether environmental issues represent a special case for the maintenance of centralised support and delivery mechanisms.
- 3.6 Support the use of Planning Obligations and the Community Infrastructure Levy (or equivalent future legislation), to secure transport emission reductions.