

## Chapter 9 Sustainable Infrastructure

### SI1 Improving air quality

An important driver of this Plan should be to meet air quality targets. The greater emphasis on cleaner streets is supported, but one that satisfies the Supreme Court's judgement that this should be as soon as possible. This requires greater regulation and restriction of vehicular traffic not only in Central London, but elsewhere. A London-wide Ultra Low Emission Zone (ULEZ) out to the M25 /GLA boundary should be a priority. Targets should be based on the more stretching and public health benefitting WHO limits. Among other measures, this will require the phasing out and ultimate banning of all diesel (including buses and water transport) in a sooner time frame.. Going along with this policy should be strong road traffic reduction targets, fewer and cleaner vehicles, and implementing London wide road user charging (see response to Policy T1). Through planning, traffic generating transport and development schemes should be actively avoided. The need to travel can be reduced by planning mechanisms that support local employment and services.

**Presently:** There is close alignment with the Mayor on the issues around air pollution. Nearly 10,000 Londoners die early every year due to air pollution (including from fine particles and the toxic gas Nitrogen Dioxide or NO<sub>2</sub> making it the biggest environmental cause of premature death). The capital suffers under illegal levels of NO<sub>2</sub> — EU legal limits set to protect health should have been met in 2010, or 2015 at the very latest. Limits now have to be met in the shortest possible time, following the UK Supreme Court ruling, and all possible measures must now be taken so that our air is cleaned up much sooner. Road traffic is the biggest problem.

#### **What Needs To Be Done:**

New schools, hospitals or care homes should not be built in air pollution hotspots and schools near busy roads should be fitted with effective air filtration systems — as recommended by the House of Commons Environmental Audit Committee.

All of London must be made to meet EU legal limits for NO<sub>2</sub> by 2020 at the latest — this is the date the rest of the UK will have to comply by, and Londoners should not have to suffer dangerous levels of air pollution for a further 5 years after the rest of the country.

London must set itself on a path to meet the World Health Organisation recommended level for PM10 air pollutants. New limits for finer particles PM2.5 will be needed. Tackle construction machinery and river/canal boats that emit high levels of pollutants.

Reduce the need for people to have to travel, promote and designate by way routes that have lower levels of pollution for walkers and cyclists, cut road traffic levels and ensure road vehicles are clean (which should mean phasing

out diesel altogether), and this means a joined up approach to improving the environment, transport and infrastructure with:

- strong road traffic reduction targets and avoiding traffic generating transport schemes;
- fewer vehicles and cleaner vehicles;
- implementing London wide road user charging; and
- strengthening Low Emission requirements to include cars.

Meeting air quality targets requires greater regulation and restriction of vehicular traffic in Central London and elsewhere with the phasing out and ultimate banning of all diesel (including buses and water transport) and a London-wide Ultra Low Emission Zone (ULEZ). It should be remembered that manufacturers' compliance with Euro standards is held in disrepute. But climate change remains an issue even if the air quality crisis was solved. The Road Map to Zero Emission Road Transport should be amended accordingly and should be delivered through an Implementation Action Strategy setting out the measures that are determined to be necessary to fulfill this objective.

Road Traffic Reduction Target Setting would guide policy and proposals by providing benchmarks to measure progress, determine the need to strengthen or further resource implementation and require other agencies and authorities to fulfill their responsibilities in delivering an integrated transport strategy. Road user charging, London wide, would change travel behaviour and tackle congestion and pollution. (It is still in the current London Plan 2015—para 6.39A). This would create a fairer share of space for cyclists and buses, with revenue used to support sufficient, reliable, safe, affordable and accessible public transport. However, it would need to be applied in a fair and proportionate way and could operate in a variety of ways, such as higher charges during peak periods or for certain vehicle types etc. (See response to Policy T1).

Supporting guidance for the implementation of Air Quality Neutral should be made more intelligible, that is more understandable and accessible, in order that its application is more readily undertaken by the boroughs and open to scrutiny by non-technicians and communities. Presently, guidance on Air Quality offered by the London Councils organisation allows developments to predict their emissions at 105% of a site's original emissions and still be classed as AQ Neutral. Air Quality Positive has yet to be supported by published guidance.

Specifically for this **Policy, SI1A** should read: "London's air quality must be significantly improved..." in order to reflect the imperative of the Supreme Court's judgement on the current illegal levels of air pollution.

### **SI2 Minimising greenhouse gases**

Climate change remains an issue even if the air quality crisis is solved. An implementation strategy setting out the measures that are eventually determined to be necessary to fulfill the policies and proposals is essential.

The route map to achieve London as a zero carbon city by 2050 has yet to be determined. Even the current London Plan 2016 is unclear as to the mechanisms that will result in compliance with the prescribed carbon reduction targets towards the latter part of its plan period.

**Presently:** Greenhouse Gases (GHGs) may have been falling, but not enough to keep on track to meet climate change targets.

**What Needs to be Done:**

The Mayor must strengthen the Climate Change targets after the Paris agreement December 2015 and the aspiration for 1.5 degree limit to the global average temperature rise. This requires changes to energy generation, energy efficiency, and targets for renewable energy in order to achieve:

At least 80% cut in emissions by 2030 to have a strong chance to keep within the 2 degrees limit to global temperature rise based on 1990 levels.

Zero carbon new homes standard to be kept in London.

Solar panels on all new buildings and existing and new school buildings.

Increase decentralized renewables ten-fold by 2025.

100% renewables and 100% zero carbon by 2050.

The Mayor and his family of functional bodies should use their property portfolio for extensive renewable energy production and local distribution.

**Embodied Carbon:**

The role of reducing whole life building emissions (embodied carbon) as explored by this Policy is a start. The Plan should have greater referencing to 'embodied carbon', with an aim of increasing efficiency in/ minimising resource use, and as a 'tool' to measure the need to and effectiveness of carbon reduction programmes across large areas and sectors. There is an imperative to go beyond current policy concepts and targets in order to deliver the exemplary development that is needed for a London under resource and environmental pressures. It is appropriate to think, for example, beyond zero carbon buildings and plan for buildings that are carbon sinks. Again, although particularly challenging, would be an implementation plan for the reorganising of London's activities and developments to minimise embodied carbon that would truly realise a zero carbon London. But see under the response to 'Low Carbon Circular Economy' the Just Space proposal for a **'Green and Localised Economy'** and our response to §3.1.11. in Chapter 3 above.

**Policy SI2C** should be rewritten to clarify that "a minimum on-site reduction of at least 35%..., 10% ... and 15% through energy efficiency measures" is an interim step on the way to meeting the zero-carbon target and timeline milestones should be provided. This is to ensure the ambition of this Policy is met in a timely and measurable way. A post-occupancy evaluation requirement should be added to Policy SI2 to ensure that development is performing in accordance with specifications.

### **SI3 Energy infrastructure**

**Presently:** Significant levels of fuel poverty and inefficient energy use, coupled with fossil fuel based supplies and suppliers distant from consumers. There are many winter deaths, especially in hard winters.

#### **What Needs to be Done:**

A shift is needed in London's energy infrastructure, to meet carbon emission targets, move away from fossil fuels and nuclear dependence and tackle fuel poverty, by:

The creation of an ambitious new fully licensed not-for-profit publicly owned energy supply- company owned by London public bodies that is dedicated to cheaper, cleaner and more democratic energy. (See <http://switchedonlondon.org.uk/> ). One that is more interventionist and can take meaningful action on fuel poverty, democratically run by and in the interests of Londoners.

A major retrofitting programme for existing homes, with those in fuel poverty having their homes insulated first, and

The introduction of London-wide minimum energy efficiency standards in private rented homes, of Energy Performance Certificate C, by 2025.

All efforts should be made for pension fund divestment from fossil fuels and reinvestment in renewables. The GLA should implement full and immediate divestment from all fossil fuel companies.

Future proofing by recognising that the supply of energy for cooling, and the supply of cooling itself, will become increasingly important over time. Similarly, the supply of energy for electric vehicles will change the dynamics of energy generation and consumption. There are increasing prospects of vehicle batteries acting as storage for non- continuous renewable energy, for example.

These are further elaborated in the following sections on **Caring for Existing Homes** and on **Quality for New Homes**. **Proposals that follow relate to the sustainability objections of Chapter 9 and the design considerations of Chapter 3.** Fuel poverty is a pressing social issue and should be specifically addressed within Policy.

#### **Caring for Existing Homes**

**Presently:** It is essential to maintain and refurbish existing homes, not knock them down. Given the material loss of social housing, it should be a high priority that existing social rented homes are protected and this requires changes to the current model of estate regeneration. Demolition of homes is among the most contentious issues in urban regeneration. [Just Space](#) and the [London Tenants Federation](#) commissioned the Engineering Exchange and the [UCL Urban Laboratory](#) to review the technical evidence for demolition or refurbishment of social housing in London. The review found that housing refurbishment is often better than demolition and reconstruction, when considering social, environmental and energy factors. The series of resources

includes life cycle evidence review and a Carbon (embodied energy) Fact Sheet: <http://www.engineering.ucl.ac.uk/engineering-exchange/demolition-refurbishment-social-housing/>

Of particular importance are high levels of fuel poverty; the UK has one of the least energy-efficient housing stocks in Western Europe. The solution is for the Mayor to designate home energy efficiency as an infrastructure priority. Retrofitting on a large scale would provide jobs and consequent economic benefit, and reduce energy consumption and environmental degradation.

**What Needs to be Done:**

The Mayor and the boroughs will support maintenance and enhancement of the condition and quality of London's existing homes to ensure that new homes delivered are additional to existing stock rather than replacements. This will include designating energy efficiency as an infrastructure priority and using infrastructure funds to deliver stable, long term investment to implement a locally-led programme for the upgrade of all existing London homes to B and C on an Energy Performance Certificate.

Boroughs should develop policies and proposals to reduce environmental impact, particularly lifetime and embodied carbon emissions, through the sustainable retrofitting of existing homes. In particular they should:

- Prioritise adaptations to the homes of older residents.
- Prioritise fuel-poor and vulnerable households .
- Identify synergies between new developments and existing homes.
- Though retrofitting of energy and water efficiency measures, decentralised energy and renewable energy options.
- Make the link with public health programmes (for example, a boiler on prescription programme for those most vulnerable).
- Include minimum energy efficiency standards as a condition of licensing in the private rented sector.
- Encourage energy rights initiatives and community based energy projects.

Refurbishment options for existing council or housing association estates should include proposals to retain, enhance or deliver green and garden spaces, play and youth provision and community space and buildings.

Proposed regeneration of council or housing association estates should require comprehensive, independent analysis of social, environmental (including embodied carbon) and economic benefits of all proposed options and a ballot of tenants and leaseholders. Options should always include refurbishment.

**Quality of New Homes**

**Presently:** New homes are not being delivered with full consideration of longevity and durability of construction (c.f. embodied energy). The health of

residents should guide design, avoiding the negative impact of dark homes and outside spaces and providing sufficient communal areas. The GLA has permitted developments far above levels agreed in the density matrix, yet there has been no analysis of the effects on health and wellbeing of people living in them or affected by them. Attempts to reduce standards of sun and day-lighting for development will have knock-on effects on energy consumption and amenity spaces that need to be carefully analysed.

The emphasis placed on access to public transport within the density matrix brings with it the danger that we lose sight of the higher goal whereby people can satisfy their daily needs of work, shopping and recreation within walking distance and only have to rely on mechanised transport for more occasional needs — the ‘walkable city’ concept which, among other things, is more energy efficient.

Density levels can be optimised to help achieve the zero carbon city, but they should be sensitive to the needs of all communities, and all communities, including all household sizes and incomes, must have the facility to live in all parts of London.

#### **What Needs to be Done:**

New homes should be built to last a minimum of 125 years. The design and construction should ensure adaptability so that retrofitting and rearrangement of internal spaces can occur.

New homes should be energy positive.

Communal meeting spaces and green and play space with good natural light should be integral to the design of new housing blocks and estates.

A new more sophisticated density matrix that combines housing, social and community infrastructure should be developed. This will take into account household income, financial accessibility to transport, proximity of accessible (both in a physical and financial sense) sport and leisure, community, youth and safe play facilities, levels of overcrowding and preservation of local character.

#### **SI4 Managing heat risk**

Extreme heat wave summers that are presently an occasional event, are predicted to become the norm in the not too distant future. Managing heat risk and securing cooling networks are necessary measures.

#### **SI5 Water infrastructure, SI12 Flood risk management, SI13 Sustainable drainage**

**Presently:** London is both a water-scarce area and an area which is subject to flooding. Extensive and continuing land cover by water-impermeable materials stresses existing drainage; this has been compounded by changes in rainfall, higher volumes falling in shorter time. Flooding in London has become a more regular occurrence. This leads to overflowing in the combined drainage system where high flows of surface drainage mixes with sewage

flows and to consequent sewage discharge in to the River Thames. The construction of the Tideway Tunnel is recognised as a partial solution.

Covering of permeable surfaces and intensification of rainfall have contributed to the growing flooding problem. Densification of London's housing, by eroding existing open space, including brownfield space, is also contributing to the future problem of water scarcity. Again, rainfall intensification, short, intense showers, leads to run-off rather than retention. London lies in a water scarce area with similar rainfall volumes to parts of North Africa. Rainfall, here, is half of that falling in the driest areas of Wales.

### **What Needs to be Done:**

The '**Blue Green City**' (see below) will ensure that water management plans provide the maximum green infrastructure benefits and that green infrastructure contributes to flood risk management. Key elements will include:

- Sustainable urban drainage systems
- Stopping the leaks
- Increase in river and canal transport for passengers and freight, including waste and construction materials

An important tool for achieving this cross-cutting policy approach is Integrated Water Resources Management which understands that water resources are an integral component of the ecosystem, a natural resource, and a social and economic good. These should be rolled out beyond Opportunity Areas to manage risk and promote good planning of environmental assets (9.5.12). Incremental, low impact small scale interventions should be promoted.

Specifically for **Policy SI5C3**, it should be noted that the Health Inequalities Strategy's Integrated Impact Assessment flagged up water poverty as an issue for large poor families that have or are likely to receive smart metering. Water consumption minimisation through this measure needs to address this issue.

### **Making London a Blue Green City**

Given the interactions between different aspects of the environment, an integrated and holistic approach is needed to tackle the existing and predicted economic and population growth of London. The internationally agreed principle of sustainable development stresses that we "achieve our goals of living within environmental limits and a just society, and we will do it by means of sustainable economy, good governance, and sound science". Yet, we are not "living within environmental limits". London is not on track to meet even existing targets to control climate-changing emissions and is blighted by illegal levels of air pollution. Policies have not proved adequate to address the deficiency of green space, the erosion of habitat and the protection of existing green space from commercialisation and development; or that the food we consume can be healthy, affordable and sustainable.

We have seen serious exploitation of London's waterways, overshadowed by proliferating lines of buildings, and the absence of sustainable solutions for London's water-related environmental problems.

The Mayor should make London a **Blue Green City\***, by placing value on the connection and interaction between London's blue and green assets. The Boroughs, the voluntary and community sector and the private sector, including water companies, should be brought together to: build public awareness of the importance of environmental targets such as on climate change, air pollution, protecting nature and sustainable use of water resources; and provide for community involvement in the formulation and implementation of policies and programmes to ensure environmental targets are actually achieved by the dates required.

### **Sustainable Urban Drainage System (SuDS)**

**Presently:** There are many proven methods of ameliorating surface flooding: street tree planting to soak up rainwater, green roofs and walls, permeable pavement and road surfacing, green spaces that rainwater can sink into — rain gardens, swales to channel run-off and so on. Similarly, grey water could be harvested on large roof areas and technology for harvesting, filtering and purification exists. Ideally this could be utilized in nearby housing, for toilet flushing, garden watering, car cleaning etc. Yet, these techniques are rarely used.

#### **What Needs to be Done:**

The Mayor should produce SuDS Guidance on practical measures and provide a knowledge bank for developers and planners, alongside programmes to achieve community involvement in their implementation and maintenance.

The Mayor needs to make the case for sustainable drainage and rainwater harvesting to be mandatory for water companies and new development, and will explore retrofitting for existing development.

### **SI6 Digital connectivity infrastructure**

This is particularly important for future-proofing not just for London's "global competitiveness", but for the supporting of everyday modern life. Remember for some people there can be electromagnetic adverse effects phenomena.

### **SI7 Reducing waste and supporting the circular economy, SI8 Waste capacity and net waste self-sufficiency, SI9 Safeguarded waste sites**

**Presently:** Only about half of London's waste is recycled and land fill options are closing. Litter abounds.

#### **What Needs to be Done:**

Consistency in municipal waste collections is to be welcomed, but people still need to change their attitudes and recycle more. There is a role here for peer

to peer encouragement of behaviour change through empowered and supported community groups. Similar efforts could be applied to food waste reduction. The provision of incentives (e.g. reduced fees or Council Tax) as well as persuasion should be considered. Integrating the means to dispose waste effectively and properly, with a focus on recycling design of products and packaging is crucial. This is especially important for flats and businesses. Business waste needs to adopt high levels of recycling.

Waste from everyday living, as exemplified by non-recyclable coffee cups or plastic bottles, has now joined the concerns about waste for community and environmental groups. These now look to Scotland's zero waste and plastic bottle sur-charging for inspiration. The Mayor should do likewise.

There is a tension between the benefit of increasing recycling rates and the effort that requires. Again, there is a tension between maximising recycling rates and achieving a circular economy wherein products and materials are reused again and again. The Mayor should clarify how these tensions can be overcome.

Concerns have been expressed over the seemingly unregulated nature of construction waste reuse and that no monitoring is undertaken over the disposal of hazardous materials such as asbestos. SME builders and home improvers do not seem to have easy access to appropriate construction waste management facilities.

Food 'waste' is a resource to be returned to the natural cycle of the environment in an environmentally friendly way. Food 'waste' could be reduced by facilitating Londoners to grow their own food, for food that is the product of one's own labours that can be harvested as and when required and is less likely to go to waste if there are sharing and distributive mechanisms in place.

**Policies S17A4 and S18D3:** A moratorium on new incinerators is needed. Waste management companies are still interested in pursuing such 'energy from waste' plants on the grounds that they contribute to sustainability. Underpinning their justification for energy from waste is a fundamental misunderstanding of resource use and the Circular Economy concept. A circular economy is one that minimises the use of materials and minimises waste by using and re-using materials efficiently. (See London Assembly Environment Committee Growing, Growing, Gone Report, March 2016). Energy from waste is next only to landfill at the lower, least sustainable, end of the waste hierarchy (Waste Management Plan for England). The Plan should make it clear that waste is to be driven up the waste management hierarchy. See our comments on §2.1.11 above.

### **The Circular Economy**

**Presently:** A wider understanding of the circular economy needs to be further developed and integrated into policy and practice. It is presently

pitched and defined (9.7.1) as an economic model, but whilst this may offer attractions to businesses and those promoting economic growth, this is not its full potential. West London businesses were introduced to the concept by the Mayoral Development Corporation the OPDC, liked it, but did not understand how it can be introduced and brought up to scale. Transition will not happen unless the practicalities are understood and easy entry points to change are available.

**What Needs to be Done:**

The route map to a more sharing, lower carbon intensity lifestyle and economy is available to London through a '**Green and Localised Economy**'.

**A Green and Localised Economy**

To ensure that economic development works within environmental limits the Mayor needs to mainstream the principles of a green, circular and localised economy which would ensure better use of resources and a more dispersed pattern of activities, building on London's thriving local economies.

It will be essential to ensure that all enterprises in London have the means to become greener and to take part in a circular economy, minimising their waste and energy consumption and promoting reusing, repairing and recycling. Energy production at the ultra-local level could be an integral part of a more secure and resilient energy system and instrumental in developing sustainable local economies more generally.

The role of the public sector will be extremely important in driving innovation, research and development. The GLA and London's public institutions should plan for and invest in the future of activities with low environmental impact, especially aiming to increase the productivity of low wage sectors.

Car travel, long commutes and long-distance deliveries can be reduced by ensuring employment and amenities are available and accessible across London's neighbourhoods and that businesses are inter-connected. A more localised economy will move away from the current over-reliance on the Central Activities Zone and the town centre hierarchy, towards a more poly-centric distribution of local centres that often include high streets, shopping parades and street markets. These provide local jobs, low cost workspace and a variety of products and services, as well as essential social infrastructure.

More than two thirds of London's jobs are located outside the Central Activities Zone (CAZ) and London's 600 high streets represent some of the most important spaces in the city for the local economy; they have proved to be resilient over the centuries, adapting as circumstances change. Trading in street markets and covered markets, the oldest form of retail trading is increasingly under threat. Many of our markets are especially valuable to low-income communities and the low cost of pitches and stalls support entrepreneurship and family businesses. A rich mix of economic activity

contributes to increased wellbeing, security and support especially for those who are most disadvantaged. Local jobs are particularly important for those with child-care or other caring responsibilities especially when part-time work is scarce.

However, the historic diffusion of business spaces across London in most neighbourhoods and districts is disappearing due to the scale, density and nature of residential and current forms of “mixed-use” development. The pressure on local authorities to sell off public assets including libraries, markets, community centres and leisure centres has accelerated the loss of social infrastructure, employment and affordable workspace of all types.

**All This Requires:**

Encourage changes in consumption and production to achieve a sharing and circular economy, setting targets to reduce all types of waste, supporting reuse, repairing and recycling activities (for example through networks connecting surplus food, building materials, furniture, IT equipment etc. with people in need). Ensure support and funding schemes are easily accessible to SMEs, social enterprises and local community groups for education and training programmes (for example, waste management, resource-efficiency, accessing local supply chains).

Raise the environmental performance of the building stock and reliance on non-renewable energy sources (see response above to Policies SI 2 & 3 Greenhouse Gases and Energy) and re-configure settlement and urban patterns to reduce the need for travel.

Protect London’s poly-centric economy by supporting development which does not compromise the economy and diversity of local high streets, town centres of all scales, local shopping parades, markets and shopping centres, particularly outside the Central Activities Zone.

Support development which fosters Lifetime Neighbourhood principles (see Implementation section of Just Space’s [Towards a Community-Led plan for London – Policy directions and proposals](#)), with a focus on creating well-paid and secure local jobs and access to local amenities and services affordable to everyone.

Planning applications for major new development will take into account the need for new workspace to accommodate a mix of economic activities in all sectors, including community and voluntary organisations, social enterprises, education, play, religious, health and care facilities.

Recognise and protect street and covered markets as a) a source of healthy and cheap food and other goods b) a social benefit c) a source of independent business and local supply d) providing local employment e) an opportunity for start-up businesses. Local authorities should seek to retain control of

management and rent-setting and must consult with traders and customers on future proposals.

### **SI10 Aggregates**

Ensuring that restoration is completed in a timely way in order to protect the amenities and openness of what are mainly Green Belt/MoL designated excavation areas should be an objective of Policy SI10D.

### **SI14 Waterways – strategic role, SI15 Water transport, SI16 Waterways – use and enjoyment, SI17 Protecting London’s waterways**

**Waterways** are no longer termed the ‘Blue Ribbon Network’, and are subsumed into such Chapters as 7 Heritage and Culture, 8 Green Infrastructure and 9 Sustainable Infrastructure, with a reduction in policies and text. The Blue Ribbon Network of the current London Plan should be reinstated to reflect the strategic significance of the interweaving and interconnected extent of waterways throughout London. The activities that actually happen on the waterways, and their potentials, should inform policy more.

**Policy SI14** should deal with more than the tidal Thames by including the range and diversity of waterways. It should reference the water transport functions, including freight, alongside the more amenity-driven Thames Policy Areas/ Strategies to ensure that all the ingredients of the strategic role are properly identified.

Accompanying policies that promote wharf to wharf shipments and waterborne transport generally are supported. On the waterways there should be (more) multi-stop, fast ferry services, with TfL providing more resources for water transport (existing fare structure and waiting times are a barrier). Crossing the Thames by ferries has more merit than building more bridges, even if they are walking and cycling bridges. Shift road freight to rivers and canals by enhancing water transport opportunities, facilities and services. Operational facilities for water transport, to a degree, have policy protection through the existing London Plan 2016 (see policies 6.2 & 7.26), but satisfactory adherence to these is contested by developers etc.

### **Monitoring**

There is a relatively limited number of targets within the Sustainable Infrastructure Policies and they lack timeline milestone targets and measures. More targets, clearly stated would make possible an effective evaluation, monitoring and managing process. These need to be finely attuned and specific to the policies and proposals because Chapter 12 Monitoring Key Performance Indicators and Measures are high-level and distant from the Sustainable Infrastructure Policies.

Reference to the draft London Environmental Strategy (LES) is not particularly helpful as the draft LES IIA (7.2.1.3) promises that a framework will emerge

post adoption of LES. Evaluation and monitoring, consequently, will be problematical without further targets and milestones relevant to the Sustainable Infrastructure Policies of the Plan. Reviewing the progress of the Plan and LES is not only an issue for compliance with the Strategic Environmental Assessment Regulations but one of wider democratic accountability whereby Londoners can participate in the process, enabled by ready and easy access to information. And on this point, Just Space asks that in addition to the (quantitative) indicators, which could usefully include measuring changes in public/business opinion, awareness etc., that there be qualitative assessments undertaken by community and environmental groups. There is an important role for communities in monitoring, safeguarding and enhancing the environment.

**Indicators:**

Just Space, in its meetings with London Plan planners, included a short presentation on suggested 'Indicators for Monitoring and Implementation' for the new London Plan KPIs, did quote the observation that "monitoring is also undertaken by the London Sustainable Development Commission" (LSDC) (from London Plan IIA Scoping Report para 7.5.4) and that some of the environmental indicators, particularly the more nuanced ones, being adopted by the LSDC, together with its monitoring, would benefit from a higher profile. It is somewhat surprising that no reference to the LSDC and its monitoring can be found.

Just Space's publication "[Towards a Community-Led plan for London – Policy directions and proposals](#)" includes some suggestions for indicators (pp65-66) which are directly relevant for sustainability. These are included here below\* for the sake of completeness. But it is recognised that there ought to be further deliberation on the choice of the most suitable indicators. Just Space asks that communities be actively involved in their formulation and operation.

\*"C. Environment: Carbon emissions in relation to the minimum limit set to avoid dangerous climate change (using Defra data); similarly for air quality.  
I. Sustainability of resource use (for example capacity of renewable energy equipment installed; amount of waste generated that is not recycled).  
J. Environmentally-damaging travel and transport generated by economic activity (for example number, distance and cost of work-trips, deliveries, air-travel)."