

TRANSPORT FOR LONDON

BOARD

SUBJECT: TfL'S RESPONSE TO CONSULTATIONS ON THE MAYOR'S CLIMATE CHANGE ADAPTATION STRATEGY AND THE MAYOR'S CLIMATE CHANGE MITIGATION AND ENERGY STRATEGY

DATE: 24 MARCH 2010

1 PURPOSE AND DECISION REQUIRED

- 1.1 TfL's draft responses to the Mayor's Climate Change Adaptation Strategy (CCAS) public consultation and the Climate Change Mitigation and Energy Strategy (CCMES) Assembly and Functional Body consultation are set out respectively in Appendices 1 and 2 to this paper. They have been compiled with input from across TfL.
- 1.2 Board Members are asked to approve the attached draft responses from TfL to these consultations.

2 BACKGROUND

- 2.1 On 9 February 2010, the Mayor published the CCAS for public consultation and the CCMES for consultation with the London Assembly and Greater London Authority (GLA) Functional Bodies.
- 2.2 Production of these strategies is a requirement of the Greater London Authority Act 2007.
- 2.3 The new Mayor's Transport Strategy (MTS) was consulted upon in autumn 2009 and is being finalised now, for publication later in the spring. Close liaison has taken place between TfL and the GLA to ensure consistency between the two climate change strategies and the MTS.
- 2.4 In the case of CCAS, TfL has been involved in its development for the past two years and is aware of, and prepared for, the relevant requirements that are set out in the CCAS. TfL is a member of the Drain London Forum and the London Climate Change Partnership, both of which are also allocated actions in the CCAS.
- 2.5 In the case of CCMES, there has been joint working between TfL and the GLA for the past year on both policy and analytical tool development. Projections of future transport related carbon dioxide (CO₂) emissions in the CCMES and MTS are consistent, being derived from the same source.
- 2.6 The Mayor's Climate Change Action Plan of 2007 established a target to reduce London's CO₂ emissions by 60 per cent by 2025, from a 1990 base. CCMES

maintains the same overall CO₂ emissions reduction target and reviews initiatives within the workplaces, homes and transport sectors to contribute towards the overall target.

3 FINANCIAL IMPLICATIONS

- 3.1 TfL has an obligation under the Adaptation Reporting Power of the Climate Change Act 2008, and reflected within CCAS proposals, to publish its climate change risk assessment and develop prioritised action plans. This work is expected to be completed by the end of 2010. It is anticipated that any necessary climate change adaptation actions during the current TfL Business Plan will be met through the Plan. In addition, necessary actions, if 'designed in' at an early stages of project development or addressed through alterations in existing procedures, such as maintenance practices can minimise costs. Should the obligatory risk assessment and reporting duty identify risks whose mitigation have potentially significant cost implications post 2017/18 funding arrangements will need to be addressed.
- 3.2 Financial implications of CCMES are consistent with those of the draft MTS in that all short to medium term commitments are funded through the current TfL Business Plan or other sources. Funding for the continuation of initiatives post 2018 is assumed by CCMES in a similar manner to the draft MTS. For example, it is assumed the roll-out of hybrid buses will continue post 2018.

4 NEXT STEPS

- 4.1 The responses to the two strategies will be sent by the Commissioner to the Mayor. The deadlines for the responses are 1 April for the CCMES consultation and 9 May for the CCAS consultation.

5 RECOMMENDATION

- 5.1 The Board is asked to APPROVE the attached draft responses from TfL on the CCAS public consultation draft and the CCMES Assembly and Functional Body draft.

6 CONTACT

- 6.1 This paper and the consultation responses have been produced jointly by TfL Group Planning and Group HSE. For CCAS related enquiries, please contact Richard Stephenson. For CCMES related enquiries, please contact Michele Dix.

6.2 Name: Richard Stephenson, Director of Group HSE
Number: 020 7126 4905
Email: RichardStephenson@tfl.gov.uk

6.3 Name: Michèle Dix, Managing Director, Planning
Number: 020 7126 4513
Email: MicheleDix@tfl.gov.uk

DRAFT TFL RESPONSE TO THE MAYOR'S CLIMATE CHANGE ADAPTATION STRATEGY PUBLIC CONSULTATION

Date

Boris Johnson
Mayor of London
Greater London Authority
City Hall
More London
The Queen's Walk
London SE1 2AA

Dear

MAYOR'S CLIMATE CHANGE ADAPTATION STRATEGY PUBLIC DRAFT

TfL welcomes the opportunity to comment on your Climate Change Adaptation Strategy (CCAS) public consultation, having worked closely with the GLA to ensure the feasibility of proposed actions and alignment of policy with the emerging Mayor's Transport Strategy (MTS), which is due to be published later in the spring. We look forward to continuing to work with the GLA to finalise the CCAS and to prepare the report required by the Secretary of State under the Climate Change Adaptation Reporting Power of the Climate Change Act 2008.

TfL has contributed to the development of the transport element of the CCAS and in addition has worked with the Department for Transport's Adapting the Railways Group and taken note of the Government's Adapting Energy, Transport and Water Infrastructure to the Long-term Impacts of Climate Change report. TfL is a member of the London Climate Change Partnership and Drain London Forum and has collaborated closely with the Environment Agency on its Thames Estuary 2100 work.

TfL is, therefore, fully supportive of the nine objectives identified in CCAS and suggest that "transport systems" is explicitly added to the fourth objective.

RISK ASSESSMENT AND PRIORITISED ACTION PLAN

The single most important issue for TfL in the CCAS is Action 33 which states that "*TfL will undertake a climate risk assessment of its assets and operations and develop prioritised action plans for key climate risks*". TfL is preparing a climate risk assessment of assets and operations and developing a prioritised action plan. This will also meet similar requirements from Government, in the Adaptation Reporting Power, through which Defra requires the GLA group to publish a risk assessment of the impacts of climate change, as well as plans to address the highest priorities. Proposal 110 in the draft MTS is the equivalent to Action 33 in CCAS.

An important consideration of the prioritisation processes identified is that potential actions should be designed to be low cost (e.g. early design changes) or be affordable within anticipated funding constraints. The CCAS should make it clear that there is a cost to climate change adaptation and that securing funding for new initiatives in the current economic conditions will be challenging. TfL will work to develop cost estimates of the priority actions identified.

ADAPTATION INITIATIVE RISKS

TfL suggests the CCAS could also advise on measures to ensure that adaptation activities across London are undertaken holistically. The CCAS should refer to the need to integrate and systematise adaptation measures so that adaptation of one system or location is not detrimental to an adjacent location or linked system, for example diversion of flood water from one asset with the side-effect of increasing flood risk to another.

TRANSPORT AND CLIMATE CHANGE ADAPTATION POLICY INTEGRATION

The CCAS identifies 34 actions arranged under high level policies; the most relevant to TfL are commented on below.

Part 1 (Chapter 1 and 2) Context for Adaptation in London

The summary of climate change projections for London, taken from the United Kingdom Projections 2009, will be a useful source of data to inform TfL's infrastructure designers, especially for infrastructure with a long design life such as Crossrail and Victoria Station Upgrade.

Part 2 (Chapters 3-5, Actions 1 - 27) Understanding and Managing the Impacts

TfL recognises that flooding is anticipated to pose the greatest climate change related risk to London's transport system and, therefore, is fully supportive of the flooding related actions identified in the CCAS. TfL is either already contributing to the identified forums, reports and systems or is prepared to contribute once appropriate.

TfL is actively working to achieve the relevant targets for street trees and green spaces in London through, for example, planting additional trees on the Transport for London Road Network (TLRN) and incorporating the provision of trees and green space in the design of urban realm schemes such as the Better Streets programme. However, the CCAS would benefit from saying more about the importance of retaining existing trees and green space, which can be vulnerable to development proposals and injudicious maintenance regimes.

TfL is of the opinion that, given the experience of recent years, the CCAS could make a stronger reference to the threat of winter storms, including heavy snow fall.

TfL considers it would be beneficial to name transport amongst the services covered by a heatwave plan. Transport authorities should be listed amongst others with a responsibility for promoting the greening of the built environment and shading and insulating of their buildings.

Actions to adapt buildings to the impact of climate change, such as 'green roofs', minimising water wastage and designing building to minimise the risk of overheating are fully supported by TfL.

As well as changes to physical assets, responses to heatwaves may also be behavioural and organisational ones. For example, in hot weather more use may be made of different modes of transport, flexible working arrangements and switching activities to cooler periods of the day. TfL considers that the CCAS should expand on the organisational and behavioural change aspects of adapting to climate change.

Part 3 (Chapters 6-9, Actions 28 - 34) Assessing the Impacts of Cross Cutting Issues

TfL believes it is necessary to gain further knowledge of the impact of extreme weather events on modal switch to understand and model how predicted climate change may affect the transport system, including road congestion.

The CCAS should expand on the need to continue to improve communications in better informing the public about disruption to transport services and the alternatives available.

TfL looks forward to working with the GLA to ensure that the final Climate Change Adaptation Strategy is fully consistent with the final MTS, and in preparing the climate change adaptation report required by the Secretary of State.

Yours sincerely

Peter Hendy

DRAFT TFL RESPONSE TO THE MAYOR'S CLIMATE CHANGE MITIGATION AND ENERGY STRATEGY ASSEMBLY AND GLA FUNCTIONAL BODY CONSULTATION

Boris Johnson
Mayor of London
Greater London Authority
City Hall
More London
The Queen's Walk
London SE1 2AA

Date

Dear

CLIMATE CHANGE MITIGATION AND ENERGY STRATEGY ASSEMBLY AND GLA FUNCTIONAL BODY DRAFT

TfL welcomes the opportunity to comment on the Change Mitigation and Energy Strategy (CCMES) Assembly and GLA Functional Body consultation draft. TfL has worked closely with the GLA throughout the drafting process to ensure alignment with the emerging new Mayor's Transport Strategy (MTS), which is due to be published later in the spring. TfL looks forward to continuing to work with the GLA to develop the public consultation draft of the CCMES.

Your vision for climate change mitigation and energy provision in London and the aims for the transport sector is fully supported by TfL. We also support your challenging overall target for a 60 per cent reduction in London's carbon dioxide (CO₂) emissions by 2025, from a 1990 base.

The three overarching policies set out in CCMES: to reduce CO₂ emissions from transport through a shift to more efficient modes of transport, more efficient operation of transport and the use of low carbon vehicles, technologies and fuels are consistent with the approach taken in the draft MTS. However, data in the CCMES has altered the context of the contribution required from the transport sector to meet the overall CO₂ emissions reduction target from that assumed in the draft MTS. In addition, the CCMES has introduced a more detailed analysis of transport related CO₂ emissions projections. As well as providing comment on the CCMES, the following sections describe how this changed context and additional detail in the CCMES is proposed to be reflected in the final MTS.

CO₂ EMISSIONS REDUCTION TARGET

The most important issue for TfL and the MTS is the level of CO₂ emissions reduction required from the transport sector to contribute to your target of a 60 per cent reduction in London's CO₂ emissions by 2025, from a 1990 base. This has fundamental implications for transport policy.

The draft MTS considered a transport sector CO₂ emissions target for 2025 of 4.6 million tonnes, as detailed in the Climate Change Action Plan 2007. Projections of transport related CO₂ emissions in the draft MTS are based on a scenario of committed Government action, together with Mayoral policy as in the MTS.

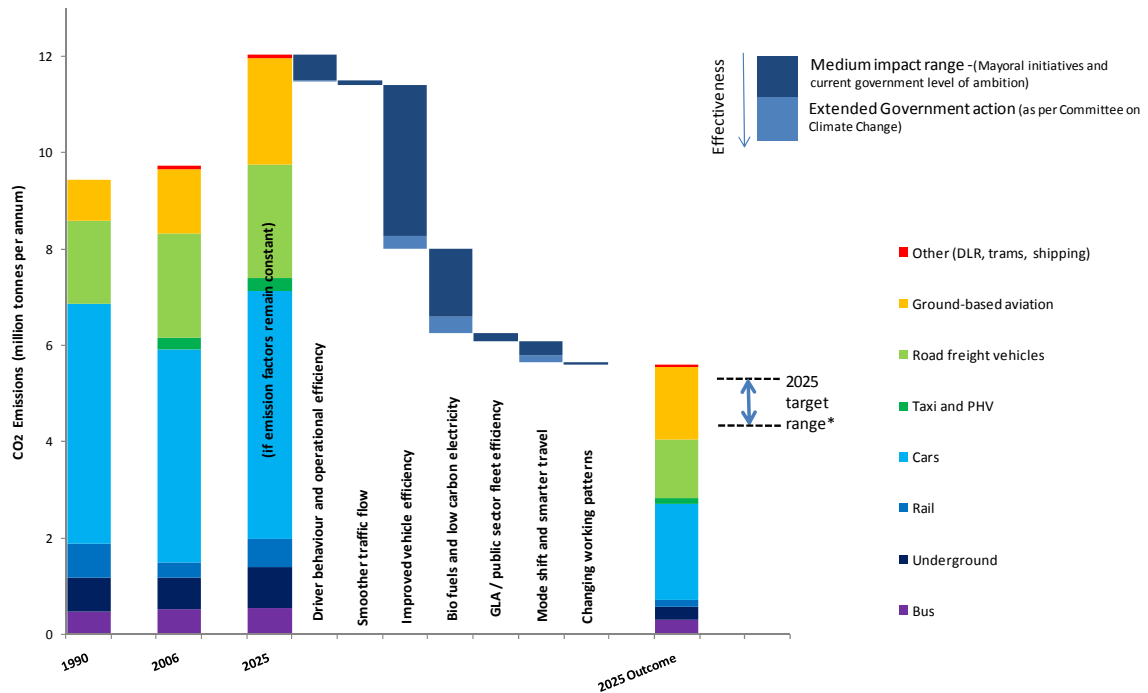
Following publication of the draft MTS, the Committee on Climate Change published a report detailing a scenario of extended Government action to tackle CO₂ emissions and called for Government to commit to this action in order to move from the current 'interim' UK carbon budgets to the 'intended' UK carbon budgets. TfL supports the CCMES approach to call for Government to move to an extended level of ambition as recommended by the Committee.

The extended level of Government action reduces projected transport related CO₂ emissions in London in 2025 by around 0.8 million tonnes. TfL proposes to include this scenario in the final MTS to ensure consistency with the CCMES.

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 per cent reduction from 1990 levels.

The CCMES, through a review of the impact of Mayoral action, Government committed action and the proposed extended level of Government action, has identified particularly effective policies to reduce CO₂ emissions from homes in London. As a result, the contribution required from the workplace and transport sectors to the overall reduction target is reduced. The CCMES presents a 2025 transport sector CO₂ emissions target of around 5.3 million tonnes. Given uncertainty as to the distribution of CO₂ emissions reductions across sectors and whether the Government will move to an extended level of ambition, it is proposed that the final MTS presents the transport sector CO₂ emissions target for 2025 as a range between the target in the draft MTS (around 4.6 million tonnes) and that in the CCMES (around 5.3 million tonnes). The following diagram indicates how it is proposed to present the transport sector CO₂ emissions target and the impact of extended Government action in the final MTS.

CO2 reduction impacts of transport policy areas by 2025



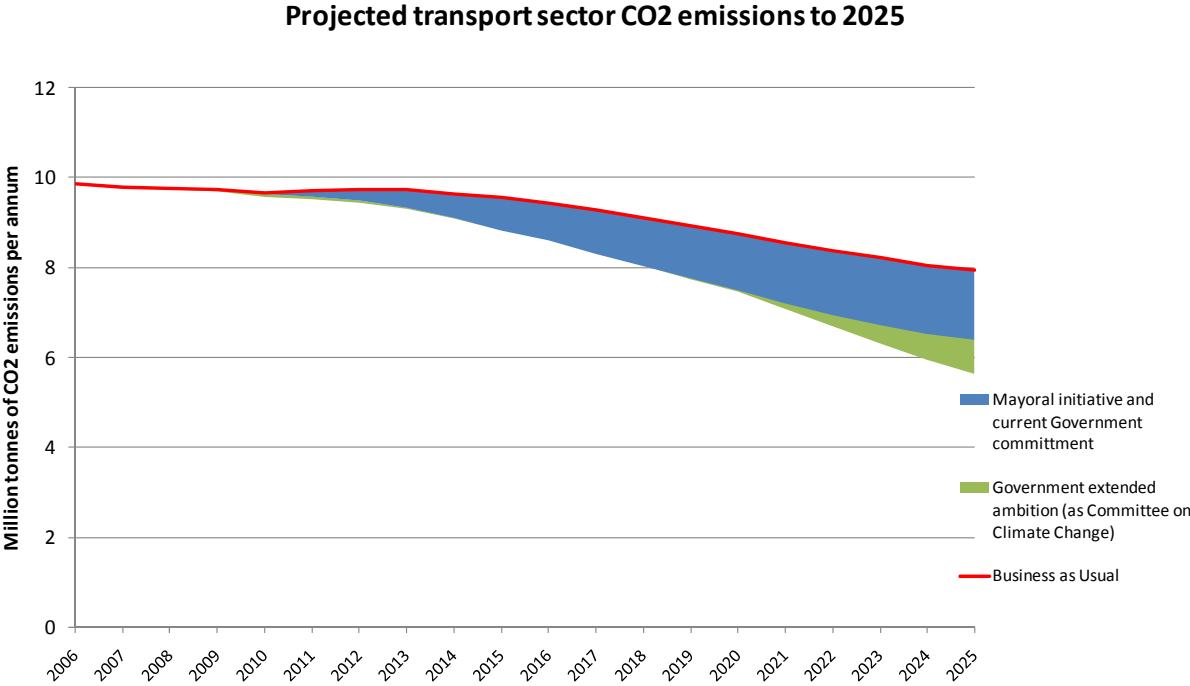
* The contribution required from the transport sector to meet the Mayor's CO2 emissions target for 2025 is linked to the CO2 emissions reductions from other sectors. Given a degree of uncertainty as to the CO2 emissions reductions that will be achieved in each sector it is anticipated that transport sector CO2 emissions in the range as indicated on the chart will be required to meet the Mayor's target.

TRANSPORT AND CLIMATE CHANGE POLICY INTEGRATION

Chapter 2) London's CO₂ Emissions

A current area of inconsistency between the draft CCMES and draft 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 draft uses data from a 2006 survey. The draft CCMES states the intention to move to 2008 survey data for the public consultation draft. TfL supports this approach and will use 2008 survey data in the final MTS and second Travel in London Report to ensure consistency.

The draft MTS does not state any interim targets for transport sector CO₂ emissions in the period to 2025 and does not detail the expected trajectory of change in transport related CO₂ emissions. Nine stakeholder responses to the MTS public consultation suggested inclusion of interim targets in the final MTS. TfL supports the inclusion of interim targets for London-wide CO₂ emissions in the CCMES, but thinks that formal interim targets for individual sectors are not appropriate. Technologies and policy to reduce CO₂ emissions are rapidly changing. Therefore, flexibility must be retained to pursue CO₂ emissions reduction in the most effective sectors. However, figure 8.4 in the CCMES does provide a projection of transport related CO₂ emissions to 2025, based on current estimates of policy and technological effectiveness. TfL proposes to add a chart using the same data to the final MTS, a draft of which is shown below.



Chapter 3) Making London one of the World’s Leading ‘Carbon Capitals’

TfL fully supports the vision of London as a leading global low carbon city. TfL has gained significant experience in stimulating low carbon sectors of the economy through targeted programmes and procurement practices, for example, the TfL Climate Change Fund and the development of hybrid buses. TfL would welcome the opportunity to provide further details of our experience in order to add further practical examples to this chapter.

Chapter 4) Securing a Low Carbon Energy Supply for London

TfL supports continued investigation of the feasibility of sustainable energy facilities on transport land and/or assets. Successful installations such as a wind turbine at West Ham bus garage and the proposal for Ground Source Heat installations as part of the Crossrail scheme demonstrate the significant potential for renewable energy generation and capture by utilising London's transport assets.

Chapter 5) London's Homes: Driving our Energy Future

As described previously, the CCMES identifies greater potential to reduce CO₂ emissions from the home sector than the Climate Change Action Plan of 2007.

Chapter 6) Cutting Costs and Carbon in London's Workplaces

We endorse the reference to TfL's role in the Buildings Energy Efficiency Programme (BEEP) in this chapter.

Chapter 8) Moving Towards Zero Emissions Transport in London

This chapter has been produced with close liaison between TfL and the GLA to ensure consistency between the draft MTS and the CCMES. As a result, the strategic approach to reducing CO₂ emissions from transport is consistent and strongly supported by TfL.

TfL considers that altered working patterns, for example, remote working, off-peak commuting etc. have potential to further reduce transport related CO₂ emissions. Relevant additional references will be included in the final MTS and are suggested for future drafts of the CCMES.

Chapter 9) Setting an Example through the GLA Family

Like chapter 8, this chapter has been developed in close liaison with TfL. Therefore, we fully support the strategic direction and key actions proposed in this chapter.

Chapter 10) Monitoring and Reporting

TfL recognises that technologies and policies to reduce CO₂ emissions are a dynamic, rapidly developing area and, therefore, supports the proposal to review the CCMES at least every five years.

TfL welcomes annual monitoring of progress towards interim and 2025 targets for CO₂ emissions in London. TfL wishes to stress the importance of continued close liaison to ensure consistency with the annual Travel in London reporting cycle.

TfL supports the intention to carry out London CO₂ emissions surveys on an annual basis and to make the survey data publically available online.

TfL looks forward to working with the GLA to ensure that future drafts of the Climate Change Mitigation and Energy strategy are fully consistent with the final MTS, and that they provide the policy framework to help deliver your vision for London.

Yours sincerely

Peter Hendy