

SCRUTINY SCOPING REVIEW - ENVIRONMENTAL POLICY

Presented by the Head of Projects and Funding Delivery

SUMMARY

The Authority currently does not have an adopted Environment Policy in place. The field of environmental policy and solutions to the climate emergency is a complex and evolving field, which lends itself to a number of perspectives and approaches.

Officers have developed a draft policy that is designed as an overarching document that sets out the framework for a detailed strategy and action plan. Alongside the policy a draft strategy has also been developed and will look in detail at how we will seek to deliver the aspirations identified in the policy. The policy sets out what feeds into the strategy (e.g. Biodiversity Action Plan, Business Plan, other policies and management plans). It also gives more detail on the areas of operation and themes as well as listing a range of things under each theme, which the Authority will undertake to support our environmental work. The strategy then details how we will monitor and review the actions, finishing off with a detailed action plan. The action plan specifically sets out actions with detail on the action, a lead, a planned outcome with a target date and KPI measure. Although the strategy and action plan are not yet finalised many of the actions are already in progress via other programmes of activity such as the "spend to save" projects and biodiversity schemes. Once the Policy is adopted by the Authority officers will progress the strategy and action plan over the next 12 months with guidance from the Scrutiny Committee with the aim to be adopted by the end of 2023. Members should note that as these environmental areas continue to develop the Authority's policy will need to be reviewed and updated where appropriate.

The consultation process has shown that there are varying views on what should be included in the Authority's Policy, Strategy and Action Plan. Local authorities are doing different things to contribute to the solution. Whilst Lee Valley Regional Park Authority (LVRPA) is not a local authority, it is as a public body focused on solutions that are achievable for us as an organisation and will seek to produce tangible improvements in environmental performance. Whilst the Authority seeks to adopt local authority best practice where practicable, it is not bound to act in the same way and it will always take into account and consider its own remit under the Lee Valley Regional Park Act 1966. This proposed policy is not focused on just carbon emissions reduction but brings together all of the potential environmental impacts or positive actions the Authority can influence including our biodiversity work, water usage, our waste treatment, travel and our property and land usage.

The UK government has set a target date of reaching net zero by 2050 although many local authorities are aiming for net zero by 2030. Net zero requires a real reduction of current carbon emissions as far as possible *before* considering offsetting, while carbon neutrality can be reached *through offsetting alone*. The Authority needs to be realistic about what it can deliver, both in the context of its statutory remit and taking into consideration the implications for the capital and revenue budget. It would not be credible for the Authority to establish an Environmental Policy which in effect sets the organisation up to fail. However, there does need to be a high level of ambition and the ability to incorporate new technologies and ideas in the long-term pursuit of a zero carbon position.

For over fifty years the Authority has been in the business of reclamation, remediation, biodiversity improvement, opening up access to open spaces and limiting development (acquiring 5,000 acres) to develop the vision of a green lung. It has consistently delivered a range of high quality projects and regeneration in its open spaces that contribute to biodiversity improvement through the Biodiversity Action Plan, flood mitigation, habitat improvement and carbon capture. It continues to undertake these environmental improvement projects but also more recently the Authority has started to look at a range of other actions. These include “spend to save” projects to seek energy reductions; water and energy efficiencies at all venues; attending seminars through the Association of Public Service Excellence (APSE); and undertaking Carbon Literacy Training for senior officers (see Appendix C to this report).

At the Scrutiny Committee on 23 June 2022 Members agreed that there would be a “have your say” period on the first draft Environment Policy. A large number of stakeholders and interested parties were alerted to the exercise and we ran social media communications to direct people wishing to comment to the website. At the close of the “have your say” period a total of 21 comments had been received on the policy.

All comments were assessed, considered against the relevant sections of the policy and a view from the Authority formulated (see Appendix A to this report). There were comments about adding in biodiversity improvements and linking more to the Biodiversity Action Plan and further comments were about the language and a request for the policy to be more specific and direct.

From the comments received a number of revisions have been made to the Policy and a revised draft is presented with recommendation to now progress this policy (see Appendix B to this report).

The policy has been developed to recognise the unique nature of the Authority and the areas that may contribute to the environment whilst identifying others which may be detrimental and any mitigation actions that can be developed. The policy will sit as an overarching direction guiding how the Authority then develops the detailed strategy and action plan. The strategy and action plan will be the topic for the Scrutiny Committee to review and develop. The Committee will also monitor the delivery of the action plan.

Members are asked to propose the policy for approval by the Executive Committee. The Environmental Policy will then require approval by the full Authority. Members are also asked to approve that the focus of future Scrutiny is the continued review and development of the Draft Environmental Strategy and Action Plan.

RECOMMENDATIONS

- Members note: (1) the report; and
- Members recommend to Executive Committee: (2) the revised draft Environment Policy.

BACKGROUND

- 1 The Authority has for the past fifty years been delivering a range of environmental projects and regeneration in its open spaces that contribute to biodiversity improvement through our Biodiversity Action Plan, flood mitigation, habitat improvement and through these projects various levels of carbon capture. The Open Spaces are managed very much with the environment at the forefront and have been for many years. It is only in more recent times the climate crisis has raised more actions up the agenda. In more recent activity officers have been working on a suite of “spend to save” projects to seek energy reductions and cost savings as well as water and energy efficiencies at venues and Myddelton House. This programme of activity includes plans to retrofit things such as LED lighting, office heating, water heating systems where they are out of date, and is projected to deliver a range of savings and environmental benefits. Officers have also enlisted a consultant to look at green energy options across the Authority estate to understand if we can implement technologies to generate green power for either its own use or to feed back into the national grid. The consultant’s report will be delivered in March 2023. The Authority is also delivering a range of Biodiversity Action Plan (BAP) projects increasing biodiversity and looking at new landscape projects on various sites with positive environmental benefits. We have also reduced our organisational travel, working in a more hybrid way and reducing the energy requirement at head office. The Asset and Maintenance department is also currently seeking a new post of Energy Conservation Officer to support the implementation of the “spend to save” programme and to take forward new energy saving or energy generating projects.
- 2 The Authority currently does not have an adopted Environment Policy (EP) in place – a draft has been proposed which officers are seeking to be adopted during 2023 (see Appendix B to this report).
- 3 The whole field of environmental policy and solutions to the climate emergency is a complex and evolving area. Environmental awareness has highlighted climate issues in recent years and linked them to carbon in the atmosphere resulting in global warming. However, the challenges with developing an EP do not just revolve around reducing carbon emission but covers a whole range of environmental actions, which are covered in this policy draft and will be threaded through out our policy strategy and action plan.
- 4 There are varied perspectives on what should be included in a LVRPA policy and strategy. Various local authorities are doing different things to contribute to the solution. Some are investing, others seeking funding, some doing a lot and others doing the bare minimum. The vast majority of local authorities have followed the Government position and declared a climate emergency. Other organisations have also undertaken various activities and some have done very little. Some only work to a sustainability strategy and others have a programme of green recovery focused around Nature Recovery projects, which are aimed at climate change. The intention is for the Authority’s focus to be directed to

solutions that are achievable and to deliver tangible improvements in its environmental performance.

- 5 Whilst the Authority has its own statutory remit under the Lee Valley Regional Park Act 1966, which is different to that of a local authority, it will look to adopt local authority best practice, where it is appropriate and practicable. It should be noted that whilst it is not a local authority it is as a public body focused on solutions and contributions that are achievable for us as an organisation.
- 6 As mentioned it is a complex area and the terms Net Zero or Carbon Neutral need to be fully understood. These two terms are often talked about interchangeably which is unhelpful. **Net zero** requires reduction of carbon emissions as far as possible through all actions, which will stop or reduce carbon emissions created by an organisation's activities where possible. Only when all options have been explored and there is no further activity that can reduce the carbon emissions of an organisation can offsetting be considered. **Carbon neutrality** can be reached through offsetting alone and in fact for some organisations there isn't a focus on actually reducing carbon emissions/footprint as much as possible and they "buy" their carbon neutral status through just offsetting. Many organisations also use offsetting to reach the carbon neutral status because some actions are just too expensive or complicated to put in reduction actions. The UK government has set a target date of reaching net zero by 2050 although many local authorities are aiming for net zero by 2030.
- 7 The Authority needs to balance ambition with what is realistically deliverable. It is a fairly simple equation in that to deliver all of the improvements that might make the Authority net zero there is a very large cost implication (yet to be calculated) and/or long time scale (as yet understood what time scale is possible). However, it should be understood that to achieve a move to carbon neutral in a short timescale (for example by 2030) the Authority budget would need to increase significantly. In the medium term (3-5 years) carbon neutral will not be achievable without major increases in the Authority's budget.
- 8 The Authority has not been able to undertake a full cost appraisal of doing everything to move towards net zero. The recent refit of Lee Valley VeloPark with LED lighting was at a cost of approximately £800k and the projected total investment on our "spend to save" energy programme has allocated £1.5m (not including the £800k for Lee Valley VeloPark LED lights). Some venues will be more advanced than others and some will require more investment. An exercise still remains to be undertaken to identify the benefits of where we might prioritise further actions and this will be completed as part of the work on the strategy and action plan.

The London Legacy Development Corporation (LLDC) has recently undertaken an exercise to cost all of the actions required to meet net zero by 2030. This figure is a potential cost of £125m and with current allocations the LLDC has a shortfall of £57m (see Appendix D to this report). Whilst the Authority has not calculated its own projections, and given our estate is much larger than LLDC's, it is unlikely any budget increase in the medium term (2030) to meet net zero would be feasible. We also know that our "spend to save" programme has a large cost associated with it and officers are currently working on pay back times for various retro fitting projects to understand which are priorities to deliver the best environmental benefit and saving against the investment. The recent fitting of LED lighting at Lee Valley VeloPark at a cost of £800k, early performance of the new LED lights show that there could be approximately 35%

reduction in consumption in kwh with a pay back time of approximately ten years. A paper went to Executive Committee on 23 February 2023 (Paper E/802/23) proposing a capital LED lighting investment at Leisure Service Contract venues. The Authority also needs to ensure that it is not setting itself up to fail and that this policy and strategy as well as seeking to be ambitious will be allowed to develop with new technologies, improvements and ideas as they become available.

HAVE YOUR SAY EXERCISE

- 9 At the Scrutiny Committee on 23 June 2022 Members agreed to a “have your say” period until the end of July to allow interested parties to make comments on the draft Environment Policy. A portal was opened on the LVRP corporate website allowing comments and feedback on the policy. Just under 100 stakeholders and interested parties along with all staff and volunteers were alerted to the exercise and were offered the opportunity to comment. We ran social media communications to direct any member of the public wishing to comment to the website with a copy of the policy and strategy and a form to comment.
- 10 At the close of the “have your say” period a total of 21 comments were received on the policy. Comments were not asked for on the draft strategy and action plan at this point as this needs to be developed further, however 23 comments were also received on the strategy and action plan. These will be kept on file for when the work on the strategy and action plan commences.
- 11 With regard to the comments received on the policy there were 3 comments from the Royal Society for the Protection of Birds (RSPB), 1 comment from Natural England, 1 comment from a private individual and 15 comments from Save Lea Marshes (SLM). There was also 1 comment from an individual (SLM) on land disposal which did not relate directly to a part of the policy.
- 12 All comments were considered and a view from officers formulated and recorded on the comments sheet (see Appendix A to this report). Many comments and proposals from the external consultation were simply not feasible or appropriate, for example closing all our car parks or removing travel expenses for staff. Other comments such as “raising the levy to pay for required improvements to meet net zero” were considered to be unrealistic and too costly. There were however some useful comments around adding in biodiversity improvements and linking more to the BAP. Many of the comments were focused on the language and a request for the policy to be more specific and direct and a revision along these lines has been undertaken (see Appendix B to this report).
- 13 From the comments made a number were considered and taken on board. A number of revisions were made to the Policy. From the 21 comments made 9 have been incorporated and revisions made (see Appendix B to this report).

ENVIRONMENTAL POLICY

- 14 The policy has been developed to recognise the unique nature of the Authority and the areas that may contribute to improving the environment whilst identifying others which may be detrimental and any mitigation actions that might be developed. The policy will sit as an overarching principle guiding how the Authority then develops a detailed strategy and action plan. The strategy

and action plan will be the topic for Scrutiny review for the next 12 months to refine and develop the proposals and action plan.

- 15 The draft of the Environment Policy (see Appendix B to this report) has now been revised following feedback from the public and stakeholders and the proposal is to put this forward to Executive Committee and full Authority for adoption.

ENVIRONMENTAL STRATEGY AND ACTION PLAN

- 16 The draft Environmental Strategy and Action Plan is now proposed to be reviewed and refined by the Scrutiny Committee over the next 12 months. This process will ensure that it is aligned to the policy and also does not just cover carbon reductions but all aspects, including, water, waste, biodiversity and other wide ranging environmental improvement actions such as training staff and educating our users. This will support the path to being a more environmentally responsible organisation. In the interim a whole range of improvements including the "spend to save" programme and energy efficiency actions, our BAP programme, projects and staff training will continue to be progressed and a list of the work currently ongoing is given in Appendix C to this report.

BASELINE INFORMATION

- 17 Officers propose that the strategy and action plan is monitored through a review of performance indicators, which will be set out in the monitoring and review section of the Strategy. The action plan will set out actions over a period of time yet to be agreed. We propose the Authority's performance management framework will use the agreed range of performance indicators developed to support this strategy.
- 18 A baseline of information is currently being collected to understand the performance over the financial year 2022/23 and these will be presented to Scrutiny in late 2023. The performance and monitoring team are working closely with officers to develop these measures to be meaningful and relevant.

SCOPE OF THE SCRUTINY REVIEW OF ENVIRONMENTAL STRATEGY AND ACTION PLAN

- 19 The scope of the review should allow the Scrutiny Committee to refine the proposals and explore the value of any further amendments to the strategy or action plan required to support the policy.

ENVIRONMENTAL IMPLICATIONS

- 20 Any environmental implications are set out in the body of this report.

FINANCIAL IMPLICATIONS

- 21 There are currently no financial implications arising directly from the recommendations in this report.

HUMAN RESOURCE IMPLICATIONS

- 22 There are no human resource implications arising directly from the recommendations in this report.

LEGAL IMPLICATIONS

- 23 There are no legal implications arising directly from the recommendations in this report.

RISK MANAGEMENT IMPLICATIONS

- 24 There are potentially some risk management implications arising directly from the recommendations in this report which may lead to reputational damage if the Authority has not adopted an Environmental Policy even if it is making progress in environmental areas.

EQUALITY IMPLICATIONS

- 25 There are no equality implications arising directly from the recommendations in this report.

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PREVIOUS COMMITTEE REPORTS

Executive Authority	E/234/11 A/4137/12	Environment Strategy Draft Environment Strategy	24 November 2011 26 January 2012
Executive Authority		Contaminated Land Strategy Contaminated Land Strategy	20 September 2012 26 March 2015
Executive Authority	A/4208/15	Contaminated Land Strategy	30 April 2015
Scrutiny	S/59/21	Scrutiny Scoping Review – Environmental Policy	18 November 2021
Scrutiny	S/61/22	Scrutiny Scoping Review – Environmental Policy	23 June 2022
Executive	E/802/23	Proposed Capital LED Lighting Investment at Leisure Service Contract Venues	23 February 2023

APPENDICES ATTACHED

Appendix A	Comments Sheet and LVRPA responses
Appendix B	Revised draft of Environment Policy following “have your say” exercise
Appendix C	Environmental and spend to save projects currently pursued by the Authority
Appendix D	Highlights from report taken to LLDC Board meeting, agenda item 11 – 31st January 2023

LIST OF ABBREVIATIONS

BAP	Biodiversity Action Plan
SLM	Save Lea Marshes
RSPB	Royal Society for the Protection of Birds
APSE	Association of Public Service Excellence

LLDC
LED
EP
LVRPA

London Legacy Development Corporation
Light Emitting Diode
Environment Policy
Lee Valley Regional Park Authority

Organisation/individual you are commenting on behalf of	Page Number in Environment Policy you are commenting on	Section Title	Text in draft policy	Comments	Authority Response/Action
RSPB	5	Mission Statement	In the context of its statutory remit the Authority will work to contribute to the international aim to limit global warming and address the climate crisis by developing and delivering a strategy and action plans which will reduce its impact on the environment	Considering this is the Park's Environment Policy, we would expect to see the mission address the Biodiversity crisis, which is as grave, and closely interlinked to the climate crisis. We would like to see the following policy text and explanation include the Park's ambitions to contribute to addressing the biodiversity crisis, and its contribution toward addressing the objectives and targets of the Convention on Biological Diversity (CBD), to which the UK is a signatory, and which is a sister to the Climate Change Convention.	We have drafted amendments to reflect Biodiversity and have referenced the link more overtly to the BAP.
RSPB	7	The Challenge	We will do this by investigating all the things we can change to make our landholdings climate resilient including reducing our carbon footprint, investigating how we can improve biodiversity, improving air quality, educating people, supporting ecosystem services, creating flood resilience, health and wellbeing and developing targeted actions under each theme set out in Appendix 1.	We welcome the integration of biodiversity here into the Park's role and work, and in putting in place measures to adapt to climate change. It would be worth including a sentence outlining that the potential opportunities for 'nature-based solutions' to address climate change within the Park, which could address carbon emissions, biodiversity and climate adaption.	We have made amendments to include this.

RSPB	8	Policy Aims	<p>Although we welcome these aspirational aims, they mean little without timebound, realistic but stretching objectives with associated action plan, KPIs, resource and oversight. Some of this is set out in terms of an environment group and setting a baseline, but it would be good for this document to set out the framework of management responsibilities and leadership, and timescales for getting these measures in place, review and monitoring.</p>	<p>We will put these targets and timescales into the strategy rather than the policy. This policy is designed to direct the strategy where this type of information will be laid out in more detail.</p>
Natural England and the Ashmolean Natural History Society of Oxfordshire	All	All	<p>We welcome the Lee Valley Park Environment Policy which clearly states the commitment to "meeting or exceeding all the environmental legislation" which includes Species and Nature Recovery targets. Successful delivery of this policy will serve to protect and enhance the biodiversity of the valley, which is especially important for species such as Creeping Marshwort <i>Helosciadium repens</i> (Critically Endangered (EN) in GB), and a European Protected Species in The Conservation of Habitats and Species Regulations 2017, Schedule 5, Regulations 44(1). Lee Valley Park is one of only three sites in the England for the species and supporting the population can be achieved by maintaining an open, short sward by grazing and/or mowing. Winter flooding is beneficial for the species but it needs to be out of the water to flower and set seed. Colonies should be established at several different places so that its loss at one site does not jeopardize the whole population. Seed should be</p>	<p>We don't think it is appropriate to put this specific element into the policy but we have noted the comment. We will look to see what we say, what we will do and how we deal with this in our Biodiversity Action Plan.</p>

Private Individual	5,6,9	Various	<p>The Authority is governed by the Park Act and has a specific remit under this act which states the general duty of the Authority is: "to develop improve, preserve and manage or to procure or arrange for the development, improvement, preservation and management of the park as a place for the occupation of leisure, recreation, sport, games or amusements or any similar activity, for the provision of nature reserves and for the provision and enjoyment of entertainments of any kind."</p>	<p>Page 5 - the Mission Statement is around the Park Act but the policy seems much broader than this? Page 6 - is this policy instead of a climate change specific policy? Page 9 - have you measured baseline carbon emissions?</p>	<p>Page 5 - Yes the Act is stated but the policy is much broader. Page 6 Yes this is not a Climate Change specific policy. Page 9 We are doing that this year and seeking to have a baseline in several areas of performance.</p>
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Save Lea Marshes	4 (policy)	Version History
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<p>It says here that the first version of this policy was presented to the Scrutiny Committee on 18 November 2021 but, at the Scrutiny Committee on 18 November 2021, members were told that they were looking at the current policy not the new policy; that they were reviewing the current policy before the new policy was developed. And this was confirmed in email correspondance I had with Jon Carney: 'you are correct in your first para, that was the old version and we were seeking views that was this a subject that Scrutiny wanted to pursue in developing a new and appropriate policy/strategy.' This version history suggests that rather than start again, developing a new policy to reflect the climate crisis, officers have simply updated the existing policy. This may explain why both SLM and members think it is incredibly weak. I also think it is interesting that officers do not appear to have discussed the policy with members of the Scrutiny Committee during its development.</p>	<p>For clarity the Authority currently does not have a Policy at all so anything is new. I think there is some confusion here. To clarify there was a Strategy from 2012 but no policy. Once the policy has been agreed as a framework that we will work to the strategy will be worked on and developed further. The draft strategy is an update of the 2012 version and it is felt that this can be adapted and built upon to develop something which will contribute going forwards - the strategy and action plan were seen as working documents and not set in stone, the policy will be the framework to develop this under.</p>
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<p>Save Lea Marshes</p>	<p>6 (policy)</p>	<p>Mission statement</p>	<p>“The Authority aspires to deliver environmental innovation and best practice in the design, delivery and management of its operation, open spaces and venues. In the context of its statutory remit the Authority will work to contribute to the international aim to limit global warming and address the climate crisis by developing and delivering a strategy and action plans which will reduce its impact on the environment”</p>	<p>A mission statement should set out your stall. If this is your stall, I am not interested in buying anything from it. You shouldn't 'aspire' to do something, you should say you are going to do it. You should seek to go above and beyond your statutory remit, to really make a difference. And you shouldn't seek to contribute to the international aim, you should set your own aim and commit to reaching it. Where are the targets? This is, if you don't mind me saying, typical Lee Valley Regional Park (LVRPA) snake oil, text that can be paraded as forward-thinking but used to justify business-as-usual. I can help you rewrite this mission statement, if you are genuinely committed to developing a policy that will demonstrate the Authority's commitment to tackling the climate crisis and biodiversity loss. The mention of biodiversity loss, an aspect of the current ecological crisis that the Authority could do something about is, for example, conspicuously missing from this mission statement at the</p>	<p>As with above comments we have added something in about biodiversity and been more overt about the BAP. Targets will be in the strategy and there is deliberately no policy in the policy. Regarding the offer of writing the this is not possible and Authority Officers will write this and Members will approve it.</p>
<p>Save Lea Marshes</p>	<p>6 (policy)</p>	<p>Mission statement</p>	<p>The Authority will keep these principles at the heart of its policy, strategy development and as initiatives developed will investigate options and continually revisit these principles.</p>	<p>It is good to see mention of the circular economy in the policy but, again, we need to see firmer language here. There should be a commitment to apply the principles of the circular economy to all decisions not a commitment to 'investigate the options and revisit the principles'. With this wording, it would be quite easy to ignore the principles of the circular economy when making decisions but still adhere to the policy and that isn't good enough.</p>	<p>We are looking to adopt the principles of the circular economy. Committing to this fully has budgetary implications which we currently are not in a position to progress. We will certainly explore to see if it is something we can adopt as fully as possible but until we are clear it will be raising expectations to build this into every decision that the Authority makes.</p>

Save Lea Marshes	7 (policy)	Background	<p>Understanding climate risk, in particular to our own organisation, and what implications it may have to the public and our users is key to developing a robust policy and strategy for the Authority.</p> <p>and</p> <p>The Authority needs to develop a policy and strategy that is resilient and can adapt to climate change, new technologies and flex as new information unfolds as well as having the key aim of contributing to limiting global warming. However, the Authority recognises that most individual organisations cannot provide all of the solutions, as combating climate change needs system-wide change that involves world leaders, governments, communities, businesses, individuals and stakeholders across all sectors of the economy, across the country and the wider world. This Policy will seek to adapt where it can as other</p>	<p>This suggests the LVRPA is primarily interested in mitigating the effects of climate change on its business, not on contributing to the solution. Certainly, mitigating the impacts of climate change is important and it would be remiss of the LVRPA not to consider this. It is also true that systemic change is required to do everything we need to do to avoid an unimaginably inhospitable future for humankind, but to suggest - as this wording does - that because the LVRPA is just one organisation it should sit and watch and 'seek to adapt ... as other changes to how we live start to take shape' is shocking in its abdication of responsibility. The LVRPA is the steward for 10,000 acres. That's a lot of land and a lot of neighbours; and it's a park that was created to be London's green lung, to help the environment of London. The LVRPA should be playing a leading role in managing land for nature, demonstrating how organisations can take proactive steps to limit their impact on the environment, and</p>	<p>There are other parts of the policy that clearly demonstrate we are seeking to contribute to the solution. The green lung was not conceived just to help the environment there are several other drivers so these need to be balanced and we need to operate and provide our remit. We are certainly not seeking to sit and watch but we would be remiss to not adapt as issues unfold. The mere fact a policy has now been written should demonstrate that there is not an abdication of responsibility and we are sorry this is viewed in this way. Through a lot of its work such as BAP and other open space projects the Authority is clearly managing land for nature, demonstrating things that can be done and seeking to limit the impact on the environment. Again we are sorry there is this view.</p>
Save Lea Marshes	7 (policy)	Background	<p>The scale and pace of change needed will require major investments, changes to the way in which we use and interact with energy and changes to how we live our lives and define success. It will also redefine how we manage and interact with our environment. Above all, it will involve a collective leadership and shared ambition to deal with this challenge head on.</p>	<p>This is absolutely true, and the LVRPA needs to do more than pay lip service to the idea. It needs to set out a policy and a strategy that demonstrates the scale and pace of change with which it expects the organisation to change. I ask again, where are the targets?</p>	<p>Targets will be in the strategy and action plan.</p>

<p>Save Lea Marshes</p>	<p>7-8 (policy)</p>	<p>The challenge</p>	<p>The Lee Valley Regional Park Authority recognises that the current balance between economics, climate change, sustainability, carbon reduction and resource usage is a major challenge to many organisations and governments. It also recognises that the field of environmental management is an ever changing subject and some organisations are only currently able to have a small impact due to the nature of their business or the constraints of their core objectives, some of which will only change as larger industries and governments make headway with proposed changes.</p> <p>The Authority wants to play its part in helping to tackle one of the significant challenges of our time: a changing climate, loss of biodiversity and overconsumption of resources. Much of the Authority's work involves activity such as improvements for biodiversity and provision of cycling and walking routes throughout the</p>	<p>Yes, it's going to be difficult. Yes, there are hard choices to make. Yes, there is a challenge. But this is an extraordinary piece of deflection. On the one hand you acknowledge that the Authority is in a unique position, yet you seek only to commit to 'investigating all the things' you can do to respond to the climate emergency. You won't actually declare a climate emergency. You won't commit to achieving any targets. You'll just commit to looking into how you might do something at some point... I find that truly shocking and another illustration (if one is needed) of the LVRPA's ability to abdicate responsibility at the very same time as claiming it is doing something to solve a problem.</p> <p>There are certainly two sides to the LVRPA's business - the venues and the green spaces - and they both have different roles to play in contributing to the climate crisis and biodiversity collapse and helping to deliver a solution. So why not deal with the two</p>	<p>The comment here appears to be related to the fact we have not declared a climate emergency. This would clearly just be following what all other local authorities have done. Members will decide ultimately if we do declare a climate emergency and this can be discussed for amendment at a further scrutiny meeting. Part of this policy and further work in the draft strategy has recognised these two different parts of the organisation. Carbon Neutral and Net Zero have two slightly different meanings and we feel going for net zero is a better approach. We however can not commit to not building more venues. Carbon offsetting is another difficult area but we are not ruling it out. However, as suggested internally we are looking to see if there is a balance between what our open spaces provide in a positive way versus what venues might do in a negative way. There is still much work to do on this but we hope this is clear in the policy. We are not quite sure why there is a suggestion of failing to act? Starting this process should demonstrate the desire to act. Finally on the targets again these will be in the strategy and will be monitored through environmental performance indicators we are putting in.</p>
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Save Lea Marshes	8 (policy)	The actions	and the requirement to reduce the burden	<p>The requirement to reduce the burden on the taxpayer is a requirement that has been set internally. Many would argue that, if the LVRPA acknowledges it has a moral responsibility to act in response to the climate crisis and biodiversity collapse, it also has a moral responsibility to use the money it can access to make the changes needed to tackle the damaging effects that will affect the poorest in our communities first and hardest. 'We don't have enough money to do what we know we need to do.' is not a valid argument when you have tax-raising powers.</p>	Noted and agreed. Members will decide on if this is pursued to raise the levy to deliver the funds for various initiatives.
Save Lea Marshes	8 (policy)	The actions	The Authority is also in a position to lead by example and educate others, in particular park users to develop awareness and behave in an environmentally responsible manner.	Yes, the Authority is in a position to do this. But it does actually need to lead by example and nothing in this policy demonstrates that it intends to do so...	We are sorry you feel this has not been demonstrated but our view is we will be leading by example by implementing this policy and longer term the strategy and action plan.
Save Lea Marshes	8 (policy)	The actions	The Authority has an opportunity to develop an integrated approach to its environment policy and strategy. It will seek to develop appropriate solutions to the different types of sites, venues and open spaces that it owns and manages.	These two statements are incompatible. The Authority cannot develop an integrated approach if it looks at each site, venue or open space in isolation and develops different solutions for each of them. That creates a race to the bottom. What is needed are headline targets that each site, venue or open space must lift itself up to.	We are not suggesting we will deal with each in isolation we are saying we will do what is appropriate for various types of venue or open space. The fact there are common threads surely does demonstrate an integrated approach. Accepted that there should be targets each venue should meet and we can look at that within the strategy and action plan.

<p>Save Lea Marshes</p>	<p>8 (policy)</p>	<p>The actions</p> <ul style="list-style-type: none"> •New Builds, •Open and water Spaces, •Venues, •Events •Corporate. <p>The conundrum is that Open Spaces and their activities in the main tend to contribute to positive environmental activity (climate change mitigation, biodiversity enhancements and habitat protection). New builds can use technology to deliver carbon neutral builds but these are often cost prohibitive or difficult to implement and truly achieve a neutral build. The venues contribute in many positive ways for example to the health agenda, social cohesion and much of the remit of the Park Act but from an environmental perspective this generally contributes to negative environmental activity (energy use, travel and resource use) as do many elements of the events we run along with our corporate activity. The Authority does however need to</p>	<p>The Authority's areas of activity and operation should be divided into two categories: open green and blue spaces that can improve the environment and everything else that harms the environment. I am not dismissing the new builds, the venues, the events and corporate, but to separate them out gives them more power and less environmental accountability; it makes it easier to excuse their impact on the environment. The Authority, just as each individual, needs to recognise that there are things they do that harm the environment and there are things they do, and can do, that benefit the environment. And those have to be placed on a set of weighing scales and decisions made based on the effect the outcomes will have on the balance of those scales. If this approach is taken, the conundrum disappears, the forward momentum is established and the Authority can look ahead and become an organisation that truly understands its effect on the world: harm is reduced and balanced not excused.</p>	<p>This is precisely what we intended. Clearly this has somehow not come across. We have looked at wording to try to ensure this is more overt.</p>
<p>Save Lea Marshes</p>	<p>8-9 (policy)</p>	<p>The actions</p> <p>The Authority's policy will include a requirement to ensure that all these organisations have their own environment policy in place, which is acceptable to the Authority.</p> <p>As part of the general procurement process it will be the Authority's policy to ensure all contractors have a good standard of environmental practice and an appropriate environment policy in place.</p>	<p>The wording is strange here: the policy 'will include' and 'it will be the Authority's policy'. But this is the policy, so why not make a clear statement: The Authority requires all organisations... And why not set out, very clearly, what is required from all organisations the LVRPA works with?</p>	<p>Noted - yes this can be a word amendment - it reads a little clunky.</p>

Save Lea Marshes	9 (policy)	The actions	Customers, visitors and regular park users can also play a part and the Authority will seek to ensure it is demonstrating good practice and leading by example and provide information and interpretation via its website and onsite to engage with people about how it is supporting environmental measures.	<p>It's that weasel wording again 'will seek to ensure it is demonstrating'. Why not simply 'demonstrate'? And it will be important for the Authority to avoid greenwashing by clearly articulating harms alongside good practice. People will only really begin to understand their impact on the environment if they see the issue in the round and understand, for example, that ice skating during a climate crisis comes with an environmental price tag but that the Authority is doing X, Y and Z to minimise that price tag. And the Oxbow island by the ice centre provides a really good case study of how the Authority could demonstrate good practice.</p> <p>From Save Lea Marshes' perspective, the LVRPA has not adequately considered the impact of the ice centre on the Oxbow island and has refused to reconsider its plans for the Oxbow in light of the ice centre development. Rather than encourage people to visit the Oxbow island, the Authority could choose to illustrate its biodiversity</p>	We have re drafted with more direct wording. The comments regards the Ice Centre and forums are noted.
Save Lea Marshes	9 (policy)	The actions	We will to seek to become as environmentally supportive as we can be in either our own actions or in influencing the actions of third party operators and contractors.	<p>Again, this language is incredibly weak. You must 'be' not 'seek to become', and you must be clear about what 'environmentally supportive' means rather than give yourself a way out by saying you will be as environmentally supportive 'as you can be'.</p>	We have re worded as part of our revision to make the language more direct.

<p>Save Lea Marshes</p>	<p>9 (policy)</p>	<p>Policy aims</p>	<p>The Authority aims to seek to undertake all environmental actions and initiatives that it reasonably can relevant to the achievement of the vision within the constraints of its remit. It will investigate all areas of sustainability and new technologies to support the Policy, Strategy and associated action plans.</p>	<p>This is yet another example of language that is so hedged as to be meaningless. The policy should set out clear commitments, that acknowledge constraints but are not limited by them. Saving the planet is difficult work, but you actually have to do the work. The policy must set out the work clearly, and be used to guide the Authority to get better. With something as serious as climate change and biodiversity collapse, the policy shouldn't reflect what is possible, it should help the Authority push for what is necessary.</p>	<p>We have re worded as part of our revision to make the language more direct.</p>
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<p>Save Lea Marshes</p>	<p>9-10 (policy)</p>	<p>Policy aims</p>	<p>Organisation Policy Aims</p> <ul style="list-style-type: none"> • Follow the five themes that have been approved to develop a strategy under each theme as set out in Appendix 1 • Within the five themes, investigate and ensure appropriate and achievable environmental objectives and actions are set. • Investigate and review new technology and initiatives through an “Environment Group” which will meet once a quarter to develop and progress a strategy and action plan. • Consistently consider the environmental implications and opportunities of policies, projects, decisions and working practices. • Ensure we identify environmental risks, prioritise and manage these in an appropriate and timely way. • Seek to mitigate the impacts of past land uses and activities, in particular remediating contaminated land where possible. • Manage our operations (directly and through contractors) in ways that are 	<p>I do not think the policy is a place for a list like this. The policy should set out the Authority’s bold response to the climate crisis and biodiversity collapse, with the detail flowing from it in a separate document. This detail does little more than establish a baseline, so to include it in the policy itself significantly limits the ambition of the policy. And, of course, the language needs to be more active.</p>	<p>We have re worded as part of our revision to make the language more direct. We feel the list is relevant here.</p>
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Environment Policy

January 2023

Reference: [Version 0.3]



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i Document Information

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2	18/11/21	Initial draft taken to Scrutiny Committee v0.1
3	22/12/21	Second draft circulated to HOS and SMT v0.2
4	03/03/22	Officer group discussion and amend of v0.2 draft
5	01/01/2023	Revision following 2022 have your say exercise and community consultation. Comments taken on board and v0.3 produced
6		
7		

ii Contents

Preliminary Pages		
Section	Title	Page
Cover	Title Page	1
I	Document Information	3
ii	Contents	4

Main Body		
Section	Title	Page
1	Mission Statement	5
2	Background	5
3	Policy Aims	7
4	Responsibilities	7
5	Legal Considerations	7
6	Relevant Policies & Procedures	7
7	Monitoring & Evaluation	8
8	Glossary of Terms	8
9	Appendices and References	8
10		8

1. Mission Statement

The Authority is governed by the Lee Valley Regional Park Act 1966 (the Park Act) and has a specific remit under this act which states the general duty of the Authority is:

“to develop improve, preserve and manage or to procure or arrange for the development, improvement, preservation and management of the park as a place for the occupation of leisure, recreation, sport, games or amusements or any similar activity, for the provision of nature reserves and for the provision and enjoyment of entertainments of any kind.”

For over fifty years, the Authority has been in the business of reclamation, remediation, biodiversity improvement, access to open space and preventing development (acquiring 5,000 acres) to develop the vision of a green lung.

The Authority produces a periodic business plan, which will link to and consider the Environment Policy along with other relevant documents including the Park Development Framework and our Biodiversity Action Plan.

The Authority’s mission statement for how it will consider its future development and management from an environmental perspective given the current climate and biodiversity crisis under its remit through the Park Act and Business plans is set out below:

“The Authority will, in the context of its statutory remit, deliver environmental innovation and best practice in the design, delivery and management of its operation, open spaces, biodiversity and built facilities . It will do this by developing and delivering under this policy a strategy and action plan which will reduce its impact on the environment, improve biodiversity and seek to deliver a culture aligned with the principle of a circular economy. It will do this internally and through partnerships with other agencies and communities.”

The overarching aim of this policy is to follow the circular economy principles. A circular economy is based on three principles:

- Design out waste and pollution
- Keep products and materials in use
- Regenerate natural systems



The Authority will keep these principles at the heart of its policy, strategy and action plan development and as initiatives develop the Authority will investigate improvement options and continually revisit these principles.

2. Background

Why Develop a Policy?

The IPCC 2018 report on climate change found that meeting a 1.5°C target is still achievable, success is dependent on an ambitious international effort and an increase in investment. Exceeding the 1.5°C target would affect weather patterns, cause sea levels to rise further, create food and water shortages, and affect human security and economic growth. The special report Global Warming of 1.5°C (IPCC, 2018. Summary for Policymakers) shows that 420 million additional people will be exposed to extreme heat and up to 270 million additional people to water scarcity if global temperatures rise by 2°C, compared with a 1.5°C scenario. The world is now clearly in the midst of a climate and ecological emergency and there is now a unanimous consensus from the scientific community on the need for rapid action.

There is clear recognition that this challenge can only be overcome by taking urgent, radical action. This crisis is something that will have an effect on us all, and for some the impact of climate change is already being felt. The UK is committed to playing its full part in meeting the international target to limit the global average temperature rise to well below 2°C above pre-industrial levels by the year 2100, and aiming for 1.5°C, known as the Paris Agreement within the United Nations Framework on Climate Change.

The Convention on Biological Diversity (CBD) was opened for signature at the Earth Summit in Rio de Janeiro on 5 June 1992 and entered into force on 29 December 1993. The objective is to develop national strategies for the conservation and sustainable use of biological diversity, and it is often seen as the key document regarding sustainable development.

The Convention developed three main goals: the conservation of biological diversity (or biodiversity); the sustainable use of its components; and the fair and equitable sharing of benefits arising from genetic resources.

It has two supplementary agreements, the Cartagena Protocol and Nagoya Protocol. The Cartagena Protocol on Biosafety to the Convention on Biological Diversity is an international treaty governing the movements of living modified organisms (LMOs) resulting from modern biotechnology from one country to another. The Nagoya Protocol on Access to Genetic Resources and the Fair and Equitable Sharing of Benefits Arising from their Utilization (ABS) to the Convention on Biological Diversity is another supplementary agreement to the CBD.

Whilst the Authority has no remit within the Park Act or legal obligation all organisations (including the Authority) have a moral duty to look at what they can do to support international, national, regional and London targets on climate change and biodiversity. Understanding climate risk and threats to biodiversity, in particular to our own operation, and what implications it may have to the public and our users is key to developing a robust policy and strategy for the Authority that contributes to the solution. There are many reports alongside the 2018 IPCC report and the CBD, which detail short, medium and long term risks. These have informed the development of this policy and are listed in section 9. The Authority needs to develop a policy and strategy that is resilient and can adapt to climate change and reverse biodiversity loss as it will seek to do all it can and as new technologies arise or new information unfolds, it will adapt as well as keeping the key aim of contributing to limiting global warming and improve biodiversity. However, the Authority recognises that most individual organisations cannot provide all of the solutions, as combating climate change and reversing biodiversity loss needs system-wide change that involves world leaders, governments, communities, businesses, individuals and stakeholders across all sectors of the economy, across the country and the wider world. This Policy will seek to adapt as these and other changes to how we live start to take shape. The reputation of the Authority is key and developing a policy and strategy seeking to support the current global issues on climate change and biodiversity will demonstrate that the Authority is seeking to play its part and contribute to the solution.

The scale and pace of change needed will require major investments, changes to the way in which we use and interact with energy and changes to how we live our lives and define success. It will also redefine how we manage and interact with our environment. Above all, it will involve a collective leadership and shared ambition to deal with this challenge head on.

The Challenge

The Lee Valley Regional Park Authority recognises that the current balance between economics, climate change, sustainability, carbon reduction, biodiversity improvement and resource usage is a major challenge to all organisations and governments. It recognises that the field of environmental management is a constantly changing and developing subject and some organisations are only currently able to have a small impact due to the nature of their business. Some organisations also have the constraints of their core objectives, some of which will only be able to change as larger industries and governments make headway with many of the proposed changes to how the world operates.

The Authority will play its part in helping to tackle one of the significant challenges of our time: a changing climate, loss of biodiversity and overconsumption of resources. Much of the Authority's work involves activity such as improvements for biodiversity and provision of cycling and walking routes throughout the park. These contribute to nature recovery, reduced use of resources through greener travel, health and wellbeing, provision of nature improvement and biodiversity improvement projects as well as acting as a carbon sink in our green open spaces. These things will remain as core objectives and this policy should also recognise the value of this work and the Authority's remit in this area.

Many local authorities, governments and organisations have declared a climate emergency for which they are directing resource and activity to a range of initiatives ranging from provision of EV charging points, retro fitting their building portfolio with energy saving equipment or replacing vehicle fleets with Electric or HVO powered vehicles. All these initiatives are being implemented to try to slow down and reverse climate change. Other organisations are also seeking ways they can support action or change how they operate to contribute towards a reduction in climate change. Much has been made of reducing carbon emissions and the current aim for many is to become carbon neutral or net zero. This can be achieved in two ways – either reducing the carbon footprint or offsetting by investing in projects which reduce or remove carbon. Organisations will need to find what works for them and seek initiatives that deliver benefits for the climate whilst also ensuring they can remain viable as a business. However, environmental contribution is not just about carbon reduction or net zero. Restoring and protecting land for recreation and to benefit wildlife, managing land to conserve and enhance biodiversity, can be just as important and should be recognised. Biodiversity net gain will be something used in the

future and organisations can look at integrated approaches to create overall benefits this will also be a focus for the Authority as opportunities arise and we will work with partners to realise benefits in our managed land portfolio to ensure BNG is considered in all that we do.

The Authority is in a unique position in that part of its operation involves work which enhances biodiversity, protect land and develops resilient open spaces, which will contribute to a range of climate change objectives in the future. Part of its operation inevitably involves activity, which may create excess carbon emissions or use resources some of which will be difficult to reduce without stopping that activity, we will investigate these areas to reduce our impact.

We recognise many Local Authorities and similar organisations have declared a climate emergency and have set target dates to become carbon neutral or “net zero”. It is unclear yet how many of these plans and target dates are achievable and only time will tell if they will be successful. Some organisations are looking at contributing elements to support international or regional targets by smaller contributions such as net zero mobility or carbon zero new builds. To meet a target of full carbon neutral for the Authority as a whole we suspect would be difficult without offsetting or unless we offset our own enhancement activities in open spaces or BAP actions against venues and services.

This policy and associated strategy will seek to determine what can realistically be achieved as a meaningful contribution rather than seeking to aim for the unachievable. Rather than declaring an emergency and setting a date to become net zero our current aim is to support the international, national, regional and London effort to reduce global warming where we can. We will do this by investigating all the things we can change or improve to make our landholdings climate resilient, reduce our carbon footprint, investigating how we can improve biodiversity further, improving air quality, educate people, support ecosystem services, creating flood resilience, health and wellbeing. We will develop targeted actions under each area of operation and themes set out in Appendix 1 of this policy.

The actions

The Authority recognises it has a responsibility and needs to minimise the negative impacts on the environment and support the climate change emergency with the need to operate as an effective public body and the requirement to reduce the burden on the taxpayer. It acknowledges the contribution it can make to protecting and enhancing the land and buildings in its custody whilst being sensitive to environmental, economic and social considerations. The Authority is in a position to lead by example and educate others, in particular park users to develop awareness and behave in an environmentally responsible manner. The Authority will take this opportunity and policy to develop an integrated approach to its environment strategy and action plan.

It will seek to develop appropriate and specific solutions to the different types of sites, venues and open spaces that it owns and manages to meet improvements in the common themes under each area of operation which will be set out in a strategy and action plan. This Policy and the strategy will address options for contractors, leaseholders and other bodies operating within the Park and ensure a joined up approach to maximise the benefit.

The Policy aims are set out in more detail in section 3.

The Authority recognises that it has a number of distinct areas of activity and operation . These can be divided into five main areas of operation as set out in Appendix 1:

- 1 - New Construction and Projects**
- 2 - Open Spaces Management**
- 3 - Facilities Management**
- 4 - Events**
- 5 - Corporate**

Open Spaces and their activities in the main tend to contribute to positive environmental activity (climate change mitigation, biodiversity enhancements and habitat protection). New builds can use technology to deliver carbon neutral builds but these are often cost prohibitive or difficult to implement to truly achieve a neutral build. We are committed to reviewing new technology on every project and build as part of our business case to deliver more sustainable and greener construction. The venues contribute in many positive ways for example to the health agenda, social cohesion and much of the remit of the Park Act but from an environmental perspective. It is a fact this part of our operation contributes to energy use, travel and resource use, as do many elements of the events we run along with our corporate activity and these are necessary to deliver our provision of sporting and leisure activity we have been proud to deliver over the past fifty years. The Authority does need to deliver its broad remit and this policy and supporting strategy will seek to construct a framework which outlines the most effective actions each theme can take to maximise its contribution to the environmental crisis. Although there may be some individual constraints the overall aim and the Authorities Environmental vision is to make improvements that support the effort to reduce climate change. We will also seek to balance out the negative impacts against the positive ones to demonstrate our overall value and understand our true effects on the world whilst providing a world class leisure destination for sport and nature.

The Authority owns assets which are leased to, managed/operated by a third party who will have their own requirements, environmental standards or policies. The Authority will require all third party organisations have their own environment policy in place, which is acceptable to the Authority. Whilst the Authority cannot impose its own standards onto other organisations it will however through its procurement process seek to ensure they all operators meet or exceed our own standards of environmental practice. Operators will be required to provide data and monitoring on a range of KPI's as set out in each contract.

The Authority uses a large number of other contractors for a wide variety of contracts from design and delivery projects through to standard operational maintenance and repair works. As part of the general procurement process the Authority will ensure all contractors have a good standard of environmental practice or an appropriate environment policy in place.

Customers, visitors and regular park users can also play a part and the Authority will demonstrate good practice, lead by example and provide information and interpretation via its website and onsite to engage with people about how it is supporting environmental measures.

This policy and the framework set out in Appendix 1 will link to an overall strategy that the Authority will adopt. The strategy will be a working document and develop specific activity and actions within each theme and a range of common threads to maximise the contribution to the climate emergency. We will become as environmentally supportive as possible in our own actions and in influencing the actions of third party operators and contractors.

Environment Group

The strategy will be steered by an "Environment Group" and specific working groups convened from relevant Authority officers reporting back to Members. The group should seek to champion the policy and strategy including developing ownership and cooperation from specific areas that will be required to deliver the strategy. This will develop a "Golden Thread" running through the organisation which is committed to supporting the objective of ensuring our operations contribute towards the international objective of limiting climate change.

3. Policy Aims

The Authority will undertake all environmental actions and initiatives that it reasonably can to address the climate emergency relevant to the achievement of the vision within its

remit. It will work on areas of sustainability and new technologies to support the Policy, Strategy and any associated action plans.

The following list of policy aims is not exhaustive and will be reviewed on an annual basis by an "Environment Group" as to how we will continue to develop actions to maximise our environmental action:

Organisation Policy Aims

- Recognise the climate emergency and biodiversity loss
- Follow the principle of the Circular Economy (see glossary)
- Follow the five business areas to develop a strategy under each theme as set out in Appendix 1
- Within the five business areas, develop and ensure appropriate and achievable environmental objectives and actions and targets are set.
- Review new technology and initiatives through an "Environment Group" which will meet once a quarter to develop and progress the strategy and action plan.
- Consider the environmental implications and opportunities of policies, projects, decisions and working practices.
- Identify environmental risks, prioritise and manage these in an appropriate and timely way.
- Mitigate the impacts of past land uses and activities, in particular remediating contaminated land where possible.
- Manage our operations (directly and through contractors) in ways that are environmentally sustainable and economically feasible.
- Meet or exceed all the environmental legislation that relates to the Authority and suppliers/contractors.
- Ensure the environmental impacts of goods and services are considered within our procurement decisions.
- Raise and maintain environmental awareness amongst staff with appropriate training and awareness activity.
- Develop a set of targets and measures to effectively monitor our environmental performance
- Develop a baseline of performance in 2022/23 and seek areas for improvement with stretch targets
- Work on public awareness of what we are doing and how the public can contribute

4. Responsibilities

All Authority staff are responsible for considering the impact on the environment of any action or activity. Senior Management Team and an Environment Group are responsible for the overview, monitoring and evaluation of the Environment Policy and any subsequent strategy and action plan.

5. Legal Considerations

There is a range of environmental legislation the Authority is required to adhere to, from simple acts within planning applications though to work undertaken in the open spaces. As an organisation we have a duty and it is our policy to keep abreast of changes in legislation and ensure we are compliant at all times.

6. Relevant Policy & Procedures

Environment Strategy and Action Plan

7. Monitoring & Evaluation

A set of KPI's specifically relating to the effectiveness of our environmental performance, will be developed to check if we are meeting targets that we set in our strategy.

The strategy will identify a range of measures which we will develop a baseline in year one (2022/23) then monitor on an ongoing basis through agreed KPI's to identify areas for improvement under each theme and strategy thread. The effectiveness of this policy will be measured against the targets set within the strategy and ongoing monitoring of the environmental KPI's for the Authority.

The implementation of this policy informs the day to day operation of the all officers and the discharge of their duties.

The policy will be rolled out via Compass for all staff and via staff training. The policy will also be available on the Lee Valley Visit and Authority Corporate web sites.

8. Glossary of Terms

Some of the terminology used in this document may be unfamiliar so this glossary has been attached to clarify some new terminology.

IPCC

Intergovernmental Panel on Climate Change

CBD

Convention on Biological Diversity

KPI's

Key Performance Indicators

Net zero

To reach Net zero the basic principle requires reduction of carbon emissions as far as possible *before* considering offsetting.

Carbon neutrality

This is slightly different to Net zero and can be reached *through offsetting alone*.

Circular Economy

A circular economy is based on three principles, 1) design out waste and pollution, 2) keep products and materials in use, 3) regenerate natural systems

Ecosystem Services

This is the many and varied benefits to people that are provided by the natural environment and healthy ecosystems. It can include things like flood defence by soft landscaping rather than hard landscaping, plants for pollination or carbon capture projects – e.g. tree planting projects which also help exchange CO₂ for oxygen.

BNG

Biodiversity net gain

BAP

Biodiversity Action Plan

9. Appendices and References

There are several references and documents which have informed this policy:

IPCC, 2018: Summary for Policymakers.

In: Global warming of 1.5°C.

**COP24 Special Report Health and Climate
Change World Health Organisation 2018**

**Net Zero The UK's contribution to stopping global warming
Committee on Climate Change May 2019**

East Herts Environment and Infrastructure Service Plan 2021-2026

Enfield Physical and Environmental Security Policy 2020

Essex Environmental Statement - Essex County Council 2021

Sustainable Hertfordshire Strategy 2020

Sustainable Hertfordshire Action Plan 2020

**What Do Londoners Think About Climate Change? Results from London Council's 2020
climate change polling**

London Councils Joint Statement on Climate Change March 2020

Mayor of London - London Environment Strategy 2018

Tower Hamlets Net Zero Carbon Plan 2020

London Legacy Development Corporation Environmental Sustainability Report 2019/20

Waltham Forest Climate Change Strategy 2008

Understanding Climate Risk – Buro Hapold LLDC report May 2021

LLDC Board meeting 31 January 2023 - Sustainability Update (agenda item 11)

Appendix 1 – Areas of Operation and Common Themes

Authority Areas of Operation

The focus is on five sub divisions which are key areas of operation as set out in the Authorities Environment Policy and carried through to the Strategy and Action Plan they are:

- 1 - New Construction and Projects**
- 2 - Open Spaces Management**
- 3 - Facilities Management**
- 4 - Events**
- 5 - Corporate**

Common Themes

Under each area of operation we have identified a list of common environmental themes that can be measured and improved upon. The aims and measures have been grouped under common themes, not all will be relevant to every areas of operation. Two areas, Procurement and Communications will be considered separately as elements under our corporate area of operation but are not common themes across all.

- Travel
- Organisational Resource use (paper, supplies etc.)
- Machinery
- Water usage and quality
- Energy usage
- Waste management
- Property and Land use (including contaminated land)
- Biodiversity and nature improvement

- Learning
- Sustainable Design + Build
- Procurement – (Corporate)
- Communications – (Corporate)

These themes will be carried through to the strategy, developed along with actions to take forward. As business plans are reviewed and technologies develop there may be further additions under each broad theme.

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Environmental and spend to save actions and projects currently being delivered/developed by the Authority

Environmental Improvement Projects

- Spittlebrook – creation of a new 200 acre Country Park with significant habitat enhancement.
- St Paul's Field – creation of a new footpath with environmental improvements
- Middlesex Filter Beds – re wetting for environmental and biodiversity improvements
- North Wall Road – potential greening/rewilding project
- East India Dock Basin – desilting and environmental and biodiversity improvements
- Following the pandemic the Authority has continued hybrid working (reducing traffic movements for business and home of office as well as travelling costs by continuing with virtual meetings)

BAP Projects

- River restoration on the River Lynch at Dobbs Weir – funded through S106 with HCC
- Installation of Floating reedbeds on the Lea Navigation at Lee Park Way – funded through the GLA's Rewild London fund
- Enhancements to Hall Marsh Scrape - enhancements identified through the Lee Valley Wader Strategy
- Range of enhancements to the Regional Parks open water habitats in partnership with local landowners, as identified through the 2021 Lee Valley Wetland Assessment (a project has been completed this year on Stanstead Innings)
- Range of enhancements on Water Vole habitat across the Regional Park as identified through the Lee Valley Water Vole Survey (2022) (enhancements undertaken this year at Stanstead Innings)
- Targeted management of Creeping Marshwort on Walthamstow Marshes including propagation of cuttings under Natural England licence
- Working in partnership with British Canoe Union, Angling Trust, EA and CRT to remove the invasive non-native Floating Pennywort from the River Lea and tributaries
- Continuing to fund the Hertfordshire Water Vole and Invasive Non-native Species Project to co-ordinate the targeted work for Water Vole conservation in the region
- Supporting local groups to continue their work to enhance waterways in the south of the Park (Tottenham and Hackney)
- Delivery of a range of environmental enhancements funded through the North London Reinforcement Project (specific projects include creation of a bat hibernacula, pond restoration and grassland restoration)

Training Activity

- Senior Management Team and Heads of Service to undertake Carbon Literacy Training from Association of Public Service Excellence (APSE) as an external provider- spring 2023
- Officers attending APSE seminars and conferences

Spend to Save Projects

The following spend to save projects are being investigated at a range of venues and sites. The list under each is not an exhaustive list and just a small number of examples of energy saving or generation projects being specifically looked at for each site.

- **Lee Valley VeloPark**

- LED lighting (already installed)
- Consider solar control measures
- Add time control to heating system
- Chiller system be investigated to gain an understanding of its efficiency and possible
- Consider installing building mounted wind turbine(s).
- Movement sensors and LED lighting to back of house areas and corridors

- **Lee Valley Hockey & Tennis Centre**

- Consider solar control measures such as the application of reflective coating or shading devices to windows.
- Add time control to heating system.
- It is recommended that the heat generator system be investigated to gain an understanding of its efficiency and possible improvements.
- Some windows have high U-values - consider installing secondary glazing.
- Add local temperature control to the heating system.
- LED lighting to back of house and public areas with movement sensors

- **Lee Valley White Water Centre**

- It is recommended that the chiller system be investigated to gain an understanding of its efficiency and possible improvements.
- Consider installing building mounted wind turbine(s).
- Consider installing solar water heating.
- Consider with chefs and kitchen managers how a training programme and monitoring systems with incentives could be implemented.
- Engage experts to assess the air conditioning systems in accordance with CIBSE TM 44.
- Consider upgrading major time controls to include optimum start/stop.
- Consider with experts implementation of an energy efficient equipment procurement regime that will upgrade existing equipment and renew in a planned cost-effective programme.
- Enable power save settings and power down management on computers and associated equipment.
- Consider engaging experts to review the condition of the building fabric and propose measures to improve energy performance.
- Engage experts to propose specific measures to reduce hot water wastage
- Consider installing a Hydro-electric generator.
- Consider installing a ground source heat pump.
- Consider switching to a less carbon intensive fuel.
- Consider installing building mounted photovoltaic electricity generating panels.
- Consider installing building mounted solar water heating.
- Consider upgrading lighting to LED technology.
- Consider upgrading lighting controls to daylight sensing.

- **Lee Valley Athletics Centre**

- Replace tungsten GLS lamps with CFLs.
- Consider solar control measures such as the application of reflective coating or shading devices to windows.
- Add time control to heating system.
- Enable power save settings and power down management on computers and associated equipment.
- Review the air conditioning energy performance report and seek to implement any outstanding recommendations for action.
- Consider fitting existing air curtains with energy saving controls such as door interlocks and occupancy time switches.
- Consider applying reflective coating to windows and/or fit shading devices to reduce unwanted solar gain.
- Consider a Combined Heating and Power (CHP) system as an alternative to conventional boilers.
- Consider installing a ground source heat pump.
- Consider installing building mounted photovoltaic electricity generating panels.
- Consider upgrading lighting including automatic controls, daylight & occupancy sensing and LEDs.
- Fit insulation jackets to valves and flanges within the boiler room to reduce heat losses.
- Consider updating the hot water time schedules to save energy over night.
- Investigate Daylight harvesting and LED lights

- **Lee Valley Riding Centre**

- Consider solar control measures such as the application of reflective coating or shading devices to windows.
- Add time control to heating system.
- Some walls have uninsulated cavities - introduce cavity wall insulation.
- Some windows have high U-values - consider installing secondary glazing.
- Some solid walls are poorly insulated - introduce or improve internal wall insulation.
- Consider replacing heating boiler plant with a condensing type.
- Replace/improve glazing and/or frames.
- Consider implementing a programme of planned lighting systems maintenance to maintain effectiveness and energy efficiency
- Fit insulation jackets to valves and flanges within the boiler room to reduce heat losses.
- Install occupancy sensing control and zoning to the lighting.
- Replace the halogen spotlights in the shop area with LED lamps.
- Consider installing a submeter to measure renewable energy produced by the on-site solar PV system.

- **Springfield Marina**

- Consider installing weather compensator controls on heating and cooling systems.
- Consider adjusting existing, or installing new, automatic external door closers, or consider adopting revolving door solutions.
- Consider installing timer controls to energy consuming plant and equipment and adjust to suit current building occupancy.
- Consider how building fabric air tightness could be improved, for example sealing, draught stripping and closing off unused ventilation openings, chimneys.
- Consider installing automatic closers to loading bay goods doors or shutters.
- Consider introducing or improving loft insulation.
- Consider introducing or improving cavity wall insulation.
- Consider fitting secondary glazing and/or under glaze sky lights where appropriate.
- Consider installing flexible plastic curtains across loading bay doors.
- Consider introducing or improving wall insulation (internal lining) to solid single skin structures.
- Consider constructing draught lobbies to reduce unwanted air infiltration.
- Lobby required in Reception to avoid cold draughts.
- No bms control of heating in the corridors and so temperatures not always ideal. Provide local control.
- Consider replacing 3 port valves with two port and variable speed pump controls.
- Consideration of solar energy collection (either solar thermal and/or photovoltaic) on roof is recommended.
- No pipe insulation to heating or hot water services
- Lighting to be redesigned and LED's introduced

- **Stanstead Marina**

- Consider installing weather compensator controls on heating and cooling systems.
- Consider adjusting existing, or installing new, automatic external door closers, or consider adopting revolving door solutions.
- Consider installing timer controls to energy consuming plant and equipment and adjust to suit current building occupancy.
- Consider how building fabric air tightness could be improved, for example sealing, draught stripping and closing off unused ventilation openings, chimneys.
- Consider installing automatic closers to loading bay goods doors or shutters.
- Consider upgrading major time controls to include optimum start/stop.
- Consider introducing or improving cavity wall insulation.
- Consider installing flexible plastic curtains across loading bay doors.
- Consider installing building mounted solar water heating.
- Consider replacing or improving glazing.
- Consider constructing draught lobbies to reduce unwanted air infiltration.
- Consideration of solar energy collection (either solar thermal and/or photovoltaic) on roof is recommended.
- Lighting to be redesigned and LED,s introduced.

- Improve sealing to large doors for winter operation.
- Some glazing is poorly insulated. Replace/improve glazing and/or frames.
- Consider installing an air source heat pump or a ground source heat pump.

- **Dobbs Weir Campsite**
 - Reduce number of immersions being used in winter season (5 down to 2) already completed.
 - Look at timers for night time lighting and or PIR sensors

- **Sewardstone Campsite**
 - Look at timers for night time lighting and or PIR sensors

- **Edmonton Campsite**
 - EPC is registered as Golf Shop but this is one building for campsite adjust for both as well.
 - Introduce HF (high frequency) ballasts for fluorescent tubes: Reduced number of fittings required.
 - Some windows have high U-values - consider installing secondary glazing.
 - Some glazing is poorly insulated. Replace/improve glazing and/or frames.
 - Consider installing an air source heat pump.
 - Consider installing building mounted wind turbine(s).
 - Roof is poorly insulated. Install or improve insulation of roof.
 - Consider installing PV.

- **Myddelton House**
 - Engage experts to assess the air conditioning systems in accordance with CIBSE TM 44.
 - Consider how building fabric air tightness could be improved, for example sealing, draught stripping and closing off unused ventilation openings, chimneys.
 - Consider introducing or improving loft insulation.
 - Consider upgrading major time controls to include optimum start/stop.
 - Consider replacing or improving glazing.
 - Consider a metering survey in accordance with CIBSE TM:39 to understand and update the current metering strategy.
 - Consider reducing heating/cooling set points and setting tighter dead bands between heating/cooling.
 - Consider adding timer controls to electric point of use hot water units.
 - Consider changing conservatory heating system from gas and connecting to wood chip boiler.
 - Consider increasing the server room setpoints to 24C+ This is still within the safe tolerance of server equipment.

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Highlights from report taken to LLDC Board meeting, agenda item 11 – 31st January 2023

LLDC Sustainability Update (agenda item 11)

- Net zero carbon by 2030 is technically achievable, but at a cost. The recently undertaken climate budget estimates this potential cost at £125m.
- The total amount of additional funding that is forecast to be required is c£57m, which is not funded within LLDC's Long Term Model, it does also not contain funding for any additional resources that may be required. LLDC is currently quantifying the resource implications to ensure it has capacity to proactively address the rising challenges.
 - LEDs in London Aquatics Centre (£510k)
 - Solar membrane on London Stadium (£4m)
 - Replacement of chillers at London Aquatics Centre (£650k)
 - Replacement of lighting at Copper Box Arena (£300k)
 - Electric lawn maintenance equipment (£19k)
 - Solar on London Stadium ticket office and shop (£81k)
 - Further LEDs at London Stadium (£900k)
 - Update to London Stadium BMS (£200k)
 - London Stadium vehicle replacements (£100k)
 - Officer to support measures (£400k to 2030)
 - District heat network (£50m)
- Key projects in the 2023/24 budget submission:
 - Street lighting (£210k)
 - Improvements to London Aquatics Centre pumps (£510k)
 - Copper Box Arena LEDs (£101k)
 - London Stadium solar panels (£175k)

4. LLDC path to net zero carbon

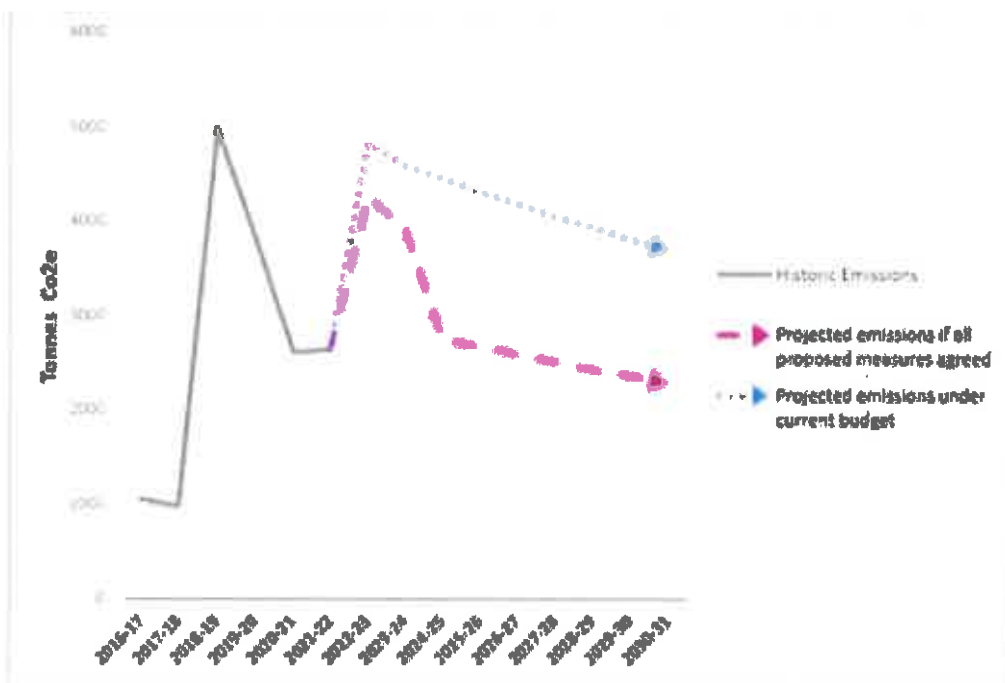


Figure 5: Annual emissions (tonnes) historic emissions with current budget (dotted blue line) and projected emissions if further budget is made available (dashed pink line). Note: The spike in 2018-19 represents the acquisition of the London Stadium. This was followed by the levels of operation due to the pandemic, with operations only returning to near normal in 2022-2023. LLDC's planned procurement of electricity via a power purchase agreement (PPA, see above for explanation) will reduce the peak stated for by approximately half – the annual being emissions associated with the direct energy services (DES).

LLDC state that there is still work to do in terms of defining the scope, and that £68M of the £125M total is derived by simply multiplying the total development pipeline by the 5% uplift in construction costs expected to be seen from achieving 1.5 degree alignment (the best data we have to date). The costs of decarbonising Olympic venues and the Olympic Park is significantly lower and many may pay for themselves in energy reduction terms.

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