

Jan 2021

Tackling the Climate Emergency Together: Team London Bridge's response to Southwark's [Draft Strategy](#) to become Carbon Neutral by 2030

Team London Bridge (TLB) is the Business Improvement District (BID) representing approximately 400 businesses in the area between London Bridge to the west, Tower Bridge to the east, and south towards Bermondsey. Our vision is to make London Bridge one of the most sustainable, culturally innovative and compelling places for business and tourism in the world. Acting on carbon is essential to delivering this mission and ensuring London Bridge continues to attract businesses and talent to work here from across the world.

TLB has a strong remit from businesses since 2015 to deliver the [London Bridge Plan](#), including an objective that London Bridge will be *one of the greenest, most beautiful, environmentally sensitive, civic minded business districts in the world*. With the backing of our business community, we have made tackling carbon key to our 2021-2026 business plan, aligned with the Southwark declaration to be carbon neutral by 2030.

The response below is set out in response to the online survey format for this consultation. Our response is based on the work we have done with Useful Projects, a sustainability consultancy based in Southwark, which has helped us develop our priorities through several workshops with businesses. We will be further developing our work through a series of webinars until March 2021, and look forward to working with Southwark to take this forward.

Principles and Approach

1. Is there anything you would add to our proposed approach?

Team London Bridge welcomes the development of a strategy and the overall principles being adopted. However, we would like to see more clarity around targets and goals, more focus on how you will deliver and develop partnerships with business for example, more on the levers that the borough has at its disposal and more on resources and how you will raise funding to support the ambitions and develop the skills.

We would like to see more evidence of the following:

i) Inclusivity and engagement:

The strategy fails to recognise the important role that businesses and landowners have in delivering many of the outputs.

We agree that a green growth agenda will only be delivered through partnership. We would welcome more involvement and engagement in developing the strategy and the action plan that will flow from this. Our reasons are twofold:

- we have been doing work with businesses around this agenda, and they are keen to partner in meaningful relationships with the council and public sector to deliver on the ambition and challenges;
- we recognise that Southwark has a critical role in convening the wider society and in developing forward looking plans.

We believe there could and should be closer collaboration and consultation in building a consensus around the strategy and in developing practical programmes of action.

ii) Whole system approach

We support the need for a whole system approach. However, we think the strategy is currently too siloed both by sector and by organisation, for example focusing on individuals, borough and national categories, but not businesses or other partners like landowners or third sector.

Currently the strategy often reads like a long list of actions, whereas in reality a holistic approach is needed. For example, biodiversity and transport are separated, but a holistic approach is needed, combining healthy streets, play, traffic reduction, drainage and greening (which will help deliver climate adaptation). This would clearly place the roads and transport teams in the council at the centre of this strategy, where they could pull together departments, bring in 3rd party partners including TfL and Highways England, access funds (e.g. the Local Transport Neighbourhoods) and work with local businesses as a core part of this. This work could look at consolidated logistics, development of the EV strategy and even the use of PV and storage thereby linking energy and transport (a great deal of innovation exists here, supported by BEIS funding for example).

The more holistic approach, we think, also has more chance of aligning with council strategies and importantly using climate as a way to generate more cross council working to deliver better neighbourhoods that support participation, accessibility and social justice.

The list of commitments on page 21 reads like a mix of targets, projects, ideas and ambitions which could do with better explanation.

The same section also lists a lot of strategies that the council will review to see how they can contribute. As part of the strategy it would be helpful if these were looked at first as many of these strategic plans could help shape this climate strategy. Clearly some of the plans listed are directly related to this strategy, for example divestment of pensions, whilst others have a strong overlap and should be designed to support this strategy.

The strategy talks about working with various partners including businesses; it would be helpful if the strategy was a co-developed document rather than one that talks about working with partners down the line.

iii) Green New Deal

We strongly support the concept of a green new deal to reinvigorate the economy, however we don't see much evidence within the plan of how this will be achieved or where the resources will come from to ensure this is at the heart of your strategy. We do note however that within the business community there is a lot of support and some real expertise in this area that could be utilised on a steering group helping to drive the strategy for the borough. We know that London Bridge attracts many large and small businesses doing incredible work on sustainability, and we certainly aspire to attract more innovation and creativity in this field. Aspirations for the Low Line, Health Innovation District and affordable business spaces in new London Bridge developments are all advanced examples of how the green economy can grow.

2. Is there anything you would take out of the proposed approach?

In terms of the three levels of influence, we believe that there is far more that can be done by working with businesses, landlords, the third sector and other public sector organisations in the borough, than can be achieved through lobbying regionally and nationally. Given how scarce time and resources are we suggest you limit your work on regional and national lobbying and focus as much as possible on the direct control and facilitation roles. The leader and key council members can and should play an active role influencing the Mayor of London and London Councils and supporting their work in promoting action at the national level (we will support you in this where possible through our own regional and national networks) but we think the key task must be to ensure the council is using its resources as effectively as possible and is engaging and working with everyone across the borough to deliver the ambition.

The strategy should be consistent and clear about definitions and targets all the way through the document and move on from discussion about how the target has or is changing (mentioning both 2050 and 2030). You use the term neutral in many different ways without explaining what this actually means under different contexts. Further in the biodiversity area you talk about net zero carbon and again need to be consistent.

Measuring Carbon

3. Do you have any comment about our approach to measuring carbon?

This is a very useful chapter. It would be good to start with a definition of carbon neutrality, so we are clear what the target is in practice.

- i) Scope of emissions.

The commitment by the council is for the borough to be carbon neutral by 2030. Is this correct, or do you mean the local authority direct emissions will be carbon neutral by 2030? When you talk about the borough, we understand this to be a geographical and not organisational term – this requires clarity.

It is surprising that the commitment only addresses scope 1, as the document explains that this is only 14% of the Council's (you say borough's) emissions and the Council's emissions are only a small part of the overall emissions of the borough. We would have expected the commitment to cover scope 2 and include commitment to addressing a significant part of scope 3 through your procurement policies.

The commitments made for example to LED seem to be the very low hanging fruit and the opportunities that offer fairly quick payback. It would be good to see a proper investment strategy with paybacks for a much wider set of opportunities. Many local authorities have already invested in LEDs so this not innovative, rather a necessity to achieve as a first step.

We would like to see more clarity on whether the strategy covers the Local Authorities own scope 1, 2 and 3 emissions, or those emissions from all sectors living and operating in the borough. We see that businesses are mentioned here, and we would like to see all sectors (and individuals) brought into the strategy. We know from speaking to our own businesses

that there is a lot that can be done geographically within the borough, but that for businesses it is essential to make change organisationally (often internationally) through scope 2 and 3.

The scope section begins to talk about embodied carbon associated with housing but in a very unspecific way. Embodied carbon associated with all infrastructure and construction works should be addressed and as a minimum accounted for whether by the council or third parties, as other embodied emissions should.

It would be useful to know how the emissions are spatially dispersed in the borough, so we can better understand where to reduce it. If this cannot be done on current evidence, we would like to work with you to ensure our approaches are aligned to measure carbon locally.

ii) Carbon offset.

We agree this will be an important part of the overall carbon strategy, but only after reductions and substitutions are addressed. Many councils and the GLA have developed carbon off-setting for development. A number of councils including Ealing have recently developed quite advanced approaches and policies on this. It would be very useful to understand and be engaged in the emerging local authority strategy on carbon off-setting and to understand to what extent funds will be used locally and on what type of projects.

iii) Baseline data

This is a useful start, but we would like to see the council really push ahead working with other London Authorities on a more robust methodology and commit to having early results published as soon as possible.

The projections for savings are interesting but it is not clear how they will be achieved or what assumptions have been made.

It is interesting to see the assumptions made about future changes. An example is the assumption that there will be no change to current technology mix for heating of homes is predicted for example when the government has made some bold statements and policy decisions about this along with transport and other issues.

The overall emissions coming out of the BAU (Business As Usual) appear to be associated with energy use in the built environment, but the focus seems to be more diffuse and it is unclear how the five areas of action relate to the baseline carbon data. It would be helpful to set this out more clearly including the relative contribution you believe actions in each theme can make to the overall goal to be carbon neutral.

4. Do you think we are right to focus on direct emissions?

No – see above, scope 2 as a minimum should also be addressed as should some of scope 3.

When we look at carbon emissions in London Bridge, there is a lot that can be done geographically, but just as much if not more organisationally through scope 3, so it will be important to engage at this level.

The climate approach is also very carbon emission driven and really should also look at measures of resilience and adaptation particularly around spatial development, housing, transport, logistics etc.

Ambition

5. Do you think we have chosen the right themes to focus on here?

Yes, essentially energy, transport, waste, biodiversity and consumption are the key themes but the link between many of the themes and the baseline data is tenuous and needs further work. In our own work, we have highlighted themes of carbon from buildings and transport, biodiversity (to absorb carbon and for climate adaptation), and waste (with linkage to the circular economy).

In addition, whilst the themes are strong, the strategy tends to break them out into separate silos, whereas the solutions will and should be holistic and much more integrated. The obvious example is the overlap between biodiversity, transport and public realm. The document talks about a whole system approach on page 20 but the strategy doesn't really reflect this.

Finally, we assume that buildings includes residential, commercial and industrial, including both the embodied and in- use carbon over the life of those buildings.

Building, construction and regeneration

6. Are there policies we should take out

Work with other councils including London councils is to be applauded but your roles in influencing others including government and learning from government and the GLA are clearly good things to do but not policies in themselves.

Policies around individual action are important as they recognise that individuals need to take action, but they are not really policies – the policies should focus on what the local authority working with government utilities, business and private residents as well as on your own estate will do to ensure for example that households have the means and ability to insulate and are incentivised or required to do this.

In amending the New Southwark Plan do you intend to go beyond the draft London Plan and if not, then is an amendment needed? The draft London Plan is quite specific and forward thinking on new buildings, and is more specific than indicated here on, for example, use of recycled construction materials, green roofs, solar panelling, passive cooling and heat pumps. It would be a good start for Southwark to ensure those draft London Plan standards are adhered to.

With embodied carbon – what specifically is Southwark going to enforce? Are you intending to enforce draft London Plan policy, which on major development you are required to, do or go beyond this? Are you thinking about whole life carbon or just embodied carbon during construction of new development? Are you intending to introduce a new cap that goes

beyond the draft London Plan on whole life building emissions and if so what standards and by when?

These standards and enforcement of them through the life cycle of the building are important in London Bridge given the scale of development that is envisaged.

Urging government to act is worthwhile but doesn't merit a policy. Urging government to increase funding for FITs seems outdated when they have scrapped this and solar is now cheap enough to be commercially viable.

7. Are there policies we should add

The policy could be more specific about adhering to standards in the draft London Plan. It would help if you are going to adopt new standards to adopt passive housing and LETI standards.

It would help if you set out a clear carbon off-set approach under this area of work as part of planning gain and defined how that funding would be used and how much carbon and social benefit it would deliver.

It would be helpful if you packaged up all the new build policies under planning and investment headings.

It would help if you separated and set out specific policies that were clearer and more targeted for existing build / retrofit and had a separate section for new build.

Energy

8. Are there policies we should take out?

Individual actions might also be suitable for businesses, such as thermostats, switching to green suppliers, install LEDs etc. They are all excellent measures, but the strategy needs to indicate a mechanism to achieve this.

Again, the broad government level policies are more a function that will be most effectively achieved by working with others but doesn't easily sit here.

The most effective policies are those that you control like retrofitting street lighting to LED. We welcome the Illuminated River work which can act as a source of inspiration in Southwark for how lighting can be sustainable and enhance the public realm.

We have reservations about extending the incinerator to extend the heat network as burning materials runs counter to wider sustainability issues including air quality and circular economy principles. Over time as materials become scarcer and issues like air quality more pressing the use of incinerators will become increasingly difficult to justify.

9. Are there policies we should add?

Stronger policies are required to develop heat networks based on zero carbon heat sources. Whilst we are not in favour of incineration (SELCHP) as a source of 'zero carbon' heat we do

think investment in zero carbon heat sources like aquifers similar to the one at the Tate, the Thames, sewers, the underground and ground etc. should all be developed.

We think more could be done around establishing a local energy company to develop investable projects that link energy generation from solar and other sources, with EV charging, district power distribution, PPAs, battery storage to reduce peak demand etc. This would promote the green economy, zero carbon, better air quality and innovation. These types of approaches could attract funding from UKRI as part of their Local Area Energy planning and Energy Innovation Zone programme and from programmes like the GLA's Local Energy Accelerator.

We would like to see policies that take a much more joined up approach and engage the public and private sector in these types of initiative. The council with its large energy demand and very significant housing and other building assets could be a very good anchor for these types of projects. We would like to see strategic conversations taking place with large landowners and developers in London Bridge (and wider). It appears that none of the new developments are proposing joined up energy networks despite their proximity, though all suggest options to connect to one if in place. It also appears that Guy's and St Thomas's Trust is looking at Lambeth rather than Southwark to deliver their energy hub, which would be a missed opportunity in the borough.

Transport and travel

10. Are there policies we should take out?

There are many positive aspirations, but these do not necessarily constitute policies. The section should focus on policies that will improve streets, for example setting out what exemplar 21st century streets look like, encompassing aspects for active travel, health, safety, biodiversity, sustainable drainage, traffic reduction, logistics and power generation, for example by setting up LEN's with support from TfL and businesses. This work should dovetail with licensing to support positive business environments, particularly post-covid.

The policies around individual action should be more around the work the council and partners can do to enable the ambitions that are listed to happen. The government policies should be removed but form part of the wider programme of work the council engages in without using too much of the limited resource you have.

11. Are there policies we should add?

The policy should say more about deliveries and logistics including consolidation, which may involve working across boundary as well as through micro-consolidation. The strategy should commit to building on the exemplar work in London Bridge through Bikes for Business, to switch business deliveries to e-cargo bikes (we are not sure what the reference to regional institutions using cargo bikes means). These have significant carbon savings in comparison to EV. Southwark can also be more proactive about enabling use of rail and the river for deliveries, such as the recent DHL trials for parcels on boats, something Guy's and St Thomas' Trust (GSTT) is also exploring.

There should be more about the way in which new development can contribute to street transformation, zero parking developments, and use of consolidations centres such as the GSTT consolidation centre in Dartford.

Biodiversity and trees

12. Are there policies we should take out?

As above, there should be policies that support the individual actions and aspirations set out in the document rather than just the aspirations.

Remove the government lobbying policies as above. These are actions that you can take but don't require a policy.

13. Are there policies we should add?

The whole approach should be underpinned by a green and blue strategy and supporting policies that will ensure the strategy is delivered. There should be greater focus on rewilding, beyond mere greening, as we have seen in London Bridge with creation of meadows. It currently reads like a list of nice to haves rather than clear strategies or policies that must be adhered to.

We would like to see a theme around climate adaptation and micro-climate that might bring together themes of density, orientation and massing, material specifications, street and public space design, urban greening, overheating and floodwater management which was properly cross cutting, contributed to carbon mitigation and adaptation and was delivered through highways, roads, streets and environment teams for example. Policies for SuDS need to be included, such as the London Bridge SuDS pilot that we are delivering with Southwark Council.

Southwark could identify policies to deliver specific green corridors, such as the Low Line Commons – a strategy for a linear green space around the rail viaduct incorporating streets, buildings, spaces, as well as new developments. We urge Southwark to seek overlap with the social regeneration charters in the borough – for example using social enterprises that develop local skills for landscaping of large new developments (or joined up ones such as St Thomas Street), rather than private contracts that have limited impact. Putting Down Roots and BOST are excellent examples in the borough, and a similar approach could be expanded along the Low Line.

Consumption and waste

14. Are there policies we should take out?

This section more than others relies both on lobbying individuals and government. It has fewer levers and policies to drive change and they are less convincing.

It requires clearer focus around supply chains and council procurement policies that are cutting edge.

15. Are there policies we should add?

We would like to see enabling mechanisms and a circular economy route map from the area with proposals for clear policy that helps sharing and circular approaches to be adopted.

Put less emphasis on government lobbying and use Southwark's resources to develop better systems that encourage dematerialisation and use of resources and a shift towards the use of sustainably and locally sourced materials. For example, how can Southwark work with partners from industry and the third sector to develop a circular economy, reduce plastics and other waste and minimise materials going to landfill or incineration (see earlier comment on SELCHP).

Given the scale of development in the borough, including London Bridge, we would like to see the circular economy working for construction sector.

Action plan and engagement

16. Is there anything you would add to our proposed approach to engagement?

This feels fairly comprehensive but perhaps underestimates the strength of support that the Council could tap into both from the public and business if it can provide the right sort of leadership and engagement.

Businesses in particular could make a significant contribution. Many successful green businesses are located in London Bridge and Southwark, and more can be done to make sure we are even more attractive to a dynamic green economy. Our work with local businesses has unearthed both a lot of interest and pent up desire to do more. The council could do more with businesses including SMEs to develop actions plans and create the right environment to deliver change.

17. Is there anything you would take out of our proposed approach to engagement?

No, it is all important and helpful.

18. Do you have any further comments on the strategy that you want to share with us?

We believe more work can be done on the strategy and have detailed this above, but are fully supportive of the area of work as a whole. All our comments are intended to strengthen the policies and approach. The businesses in London Bride are strongly supportive of the whole initiative and are keen to be part of it and contribute.

We believe a strong and robust policy that is properly resourced (and that we can bring resource to) will deliver long term social, environmental, economic and health benefits and support long term and sustainable growth.