

# Environment Scrutiny Commission

Tuesday 13 July 2021  
7.00 pm

## Supplemental Agenda

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Date: 9 July 2021

# Air quality scrutiny review report - part two

Environment Scrutiny Commission  
July 2021

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# Executive Summary

This report summarises the Commission's investigation into improvement measures of air quality in Southwark. This report builds on initial findings and observations from the commission last year, which highlighted that whilst children, older people and those with respiratory conditions are vulnerable to man-made air pollution, poor air quality impacts everyone over the course of their life.

This report recognises that the need for traffic reducing measures to be implemented in a way that equitable and fair for all. The report also looks at the need for the council and GLA to carefully monitor and track its measures to reduce and mitigate transport emissions in Southwark.

Overall, it is critical that work is done with health partners, businesses, community groups and residents to ensure that measures introduced to improve air quality are done in parallel with measures to encourage a broader demographic to take up more walking and cycling.

# Summary of Recommendations

## Recommendation One

The framework to evaluate the Low Traffic Neighbourhoods (LTNs) ought to be provided in full to scrutiny to review, and this ought to summarise work with the Emergency Services, including a section evaluating London Ambulance Service (LAS) preference for cameras informed by an analysis of the impact of LTNs on emergency vehicles response times, different barrier options, and mitigations.

## Recommendation Two

When evaluating LTNs the council ought to measure footfall on high streets, where it is possible to establish a baseline. The council also ought to outline work undertaken with traders to ensure that any difficulties (e.g. receiving supplies) are addressed and that the opportunity to maximize footfall and support the local economy is delivered.

Longer term the council ought to conduct a longitudinal study with a health partner such as King's College Hospital or Guy's and St Thomas' Hospital NHS Foundation Trust looking at the long term impact of LTNs on the health of residents.

## Recommendation Three

The Council should conduct an analysis of schools that might be more disproportionately impacted by air pollution compared to other schools (looking in particular at schools with higher proportions of students on free school meals or with students that have English as a Second Language).

Where these schools are on main roads, the analysis should identify actions that can a) be tied in with the Low Traffic Southwark strategy to reduce traffic on those main roads and b) mitigate the impact of that traffic in and around the school itself.

More generally and in the longer term strategies are required to build on School Streets and to ensure that walking and cycling are increasingly built into the whole journey to school as part of the Movement Plan and that the number of and proportion of driven journeys are continually being reduced.

## Recommendation Four

Focus on increasing PTAL in regeneration areas and where levels are low, e.g. the south of the borough, in order to reduce parking levels in new developments as close to zero as is possible

## Recommendation Five

There is evidence of a far broader demographic being attracted to cycling during the pandemic as traffic levels have fallen. Targeted work is needed with women, low income, older people, disabled people, children and young people and some Black, Asian and Minority Ethnic communities to understand the barriers to participation and the actions that will increase cycling rates, including ensuring the wider cycling infrastructure is inclusive.

## Recommendation Six

Work with Business Improvement Districts to deliver Nests to enable hubs to receive, and then deliver the 'last mile' of online shopping by e cargo bikes.

Follow up on Recommendation 15 of the Air Quality report and understand how sustainable freight is being worked into other Southwark strategies including the Movement Plan, as part of regeneration schemes and if the council is using sustainable freight for in-house services, where possible.

## Recommendation Seven

Implement a pilot e cargo hire scheme in 2022, once the current focus on LTNs and school streets is embedded, and we are firmly in recovery from the pandemic.

# Summary of Recommendations

## Recommendation Eight

The commission recommends that once the LTN review is completed that more time is given over to responding to each of the commission's previous recommendations (from the first Air quality report) and that officers and cabinet leads return to the commission with a detailed operational plan outlining how Low Traffic Southwark will be delivered and provide a full response to the below:

- 1) Develop an operational plan with partners to implement the Movement Plan, focusing on structural changes, informed by the ambitions of the Movement Plan and its associated deprivation data.
- 2) Viability testing of the target to reduce traffic by 90% by 2030
- 3) End the current diesel contract for Southwark fleet vehicles and switch to EV as soon as possible. Swap EV for sustainable transport / freight. Revisit our procurement strategy to ensure subcontractors have EV or a sustainable fleet. Set a cut-off date for compliance so that subcontractors have time to make the switch. (marked to be considered in the cabinet response to the first report)
- 4) Southwark adopts a maximum charge for bike hubs/hangers that ensures that it is cheaper than car parking by space (marked to be considered in the cabinet response to the first report)
- 5) An update on charging for parking in the borough including the development and implementation of the emissions based charging policy and if this will include reductions in car parking provision. The commission recommended that this policy looks at the parameters of vehicle size, fuel, and multiple vehicles per house.
- 6) A borough-wide greenery programme to use native hedges to screen to against air

pollution, ecological planting and also improve the environment and place making. Examples include allotments and wildlife sanctuaries. (marked to be considered in the cabinet response to the first report) In addition the commission would like to see a focus on more ecologically friendly maintenance of housing estates, including less mowing of grassy banks and verges. Green waste also ought to be converted to compost, see Earth Cycle<sup>1</sup>.

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<sup>1</sup> <https://earthcycle.co.uk/about>

# Introduction

This is the second report on Air Quality, following on from the first Air Quality report, completed in July 2020, by the previous iteration of Southwark Council's Environment Scrutiny Commission. This was a substantive report, with 20 recommendations, developed over a longer than usual administrative year, because of the pandemic. The overriding aim of the first air quality report was to deliver a reduction in overall traffic, and thus reduce one of the main sources of air pollution, with the added benefit of delivering a greener and safer borough.

This administrative year has been shorter than usual, and the main focus of this review has been to track the recommendations of the first Air Quality report, both the ones that are now being implemented, and ensuring that all the recommendations made last year are given due consideration.

Covid-19 has made the implementation of the recommendations much more challenging as traffic has become more unpredictable, public transport use has been negatively impacted by the risk of contagion, and officers, and other partners, have been stretched by the demands of the pandemic. However, the pandemic has also seen central and London government funding orientated towards schemes promoting active travel, and the transformative experience of London virtually free of traffic in spring 2020. Many more people are taking up cycling and walking and spending much more time in our local communities, allowing us to reimagine the city.

# Review Scope

The following objectives for the review were identified at the start of the year. The primary focus has been on the first two, due to the limited time available:

- i. Effective implementation of Low Traffic Neighbourhoods (LTN), by the council and partners, to ensure that they deliver better air quality for all Southwark residents, particularly those residents most at risk from the adverse impacts of poor air quality (children, Black, Asian and Minority Ethnic residents, older residents, disabled residents, residents living in deprivation etc.)
- ii. Tracking additional council and TFL measures to reduce and mitigate transport emissions in Southwark.
- iii. Making recommendations to the council and relevant partners in order to reduce other sources of air pollution, not covered in depth by the previous scrutiny review on Air Quality in 2019/20



# Evidence Received

All meetings were held online due and attendance was via video conferencing. The following officers, members and partners gave evidence:

- Guy's and St Thomas Trust Charity (GSTTC) – who are part funding Southwark's LTNs, attended to set out the aims of the schemes.
- Cabinet leads Cllr Catherine Rose, Cabinet Member for Leisure, Environment & Roads and Cllr Radha Burgess, Deputy Cabinet Member for Low Traffic Southwark attended twice
- Highways and planning policy officers gave regular evidence.
- GLA transport policy officers attended once for a focused session.

# Themes

## Greater London Authority's Work on Transport and Air Quality

The GLA evidence to the commission covered reports published on inequalities that found that deprived populations, including Black, Asian and Minority Ethnic residents are more likely to be exposed to higher pollution. The ULEZ is designed to drive down large scale pollution; particularly NO<sub>2</sub>. The GLA referenced independent research that indicated that the ULEZ will reduce pollution by 71% and 81 % for deprived and Black, Asian and Minority Ethnic populations, respectively. The ULEZ will not equalize differences between populations but it will help with health inequalities.

The Mayor's Climate Emergency target of net zero by 2030 means there will be a need to reduce car journeys by 60%. As part of this the GLA is looking at road pricing, however no decision has been made yet. The Mayor's aim is that by 2040 80% of journeys will be by a sustainable mode; currently it is 40%.

The previous Air Quality Review recommended lobbying the GLA to introduce Road User Charging as a matter of urgency, citing the Centre for London July 2018 report on Road User Charging, showing that road user charging is the most equitable way to allocate the use of road space across London. In response to the above recommendation the cabinet has said that it supports the consideration of the use of road user charging and has undertaken to continue to lobby the Mayor and GLA.

In response to the need to encourage much more walking and cycling in London the Mayor and TfL released the Mayor's London Streetspace Plan (LSP), which is focused on Low Traffic Neighbourhoods for residential streets, expanding the cycle network and improvements to walking and cycling in Town Centers.

## Effective Implementation of Low Traffic Neighbourhood (LTN)

Last year one of the main recommendations of the Commission was that Low Traffic Neighbourhoods be delivered across Southwark, starting with areas with the highest levels of public transport, worse air quality and most vulnerable populations. The report cautioned that any risk of displacement of traffic

onto main roads by Low Traffic Neighbourhoods must be complimented by measures to prevent this and ensure air quality is carefully monitored as our communities live, work, and go to school on both side roads and main roads. The review recommendations were inspired by learning from Waltham Forest Mini Holland schemes, which the GLA also commended as one of the best examples, when they gave evidence to the Commission in March 2020, saying that after some initial concerns local people are enthused by these.

The previous Air Quality report made specific recommendations on the introduction of a borough wide programme of Low Traffic Neighbourhoods, recommending these should be implemented:

- Over a wide enough area in order to realise the benefits of traffic evaporation, which has been shown to take place when there is a significant reduction of short journeys by car under 2km.
- As a priority in areas with high levels of public transport (high PTAL ratings), poor air quality, lower levels of car ownership, in areas of deprivation and where the programs would impact positively on local schools and hospitals.
- Where traffic may be displaced onto main roads, the council must monitor the impact on air quality, and mitigate negative effects in advance of implementation, possibly by widening pavements and creating cycle lanes, managing traffic to reduce vehicle idling time and introducing green screening programmes.
- In conjunction with the introduction of Controlled Parking Zones (CPZ) and a reduction of parking so the kerbside can be utilised for active travel and public realm improvements (such as pocket parks and cycle parking).
- In conjunction with improvements to Public Transport and other work on adjacent main roads to increase cycling and other forms of active travel.

Southwark has introduced several LTNs, and other measures to reduce traffic, that it is in the course of piloting during 2020/ 2021, with an overall aim of making streets healthier, safer and greener, and contributing to a newly articulated vision of a Low Traffic Southwark.

Many of these measures to reduce traffic have been introduced in 2020 as experimental traffic orders (ETMOs), using the Mayor's London Streetspace Plan funding. Some sites have been informed by previous consultation and community organizing.

Three LTN sites have been chosen in partnership with Guy's and St Thomas Trust Charity (GSTTC), who are partnering with the council to providing funding for three LTNs in the centre of the borough; Harris Primary & Nell Gwynn Nursery, Brunswick Park Primary and Ark Walworth.

GSTTC have a particular focus on child obesity, long-term conditions and air quality, which together make a focus on measures to reduce traffic, improve air quality and increase active travel an obvious priority for them.

The selection criterion for these schemes is:

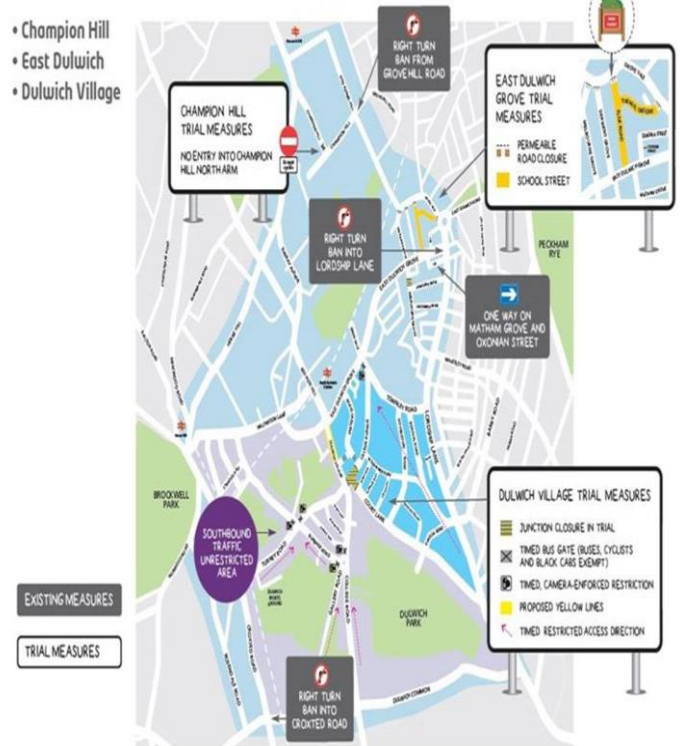
- High child obesity
- Poor air quality, particularly around schools
- High levels of social housing and deprivation
- Higher proportions of Black ethnicity populations in the locality
- Local Schools – in order to impact on children and family journeys
- Local parks – in order to increase use

The Commission heard that there will be robust evaluation of the GSTTC schemes with 20% of the budget assigned to this, which is much higher than usual. This is in order to inform future learning in Southwark and London wide. The evaluation will look at changes in behaviour, such as increased walking and cycling, on the streets with schemes, as well as adjacent streets. The number of car journeys will also be monitored. In November 2020 GSTTC told the Commission that the evaluation will not include measuring air quality, as this is challenging to do accurately, however subsequently officers informed the Commission that they are looking at the potential for high tech air quality monitoring equipment, which is welcome.

The monitoring and evaluation of Southwark LTNs will be based on the model the council is developing for the Dulwich Healthy Streets review. Dulwich

Healthy Streets has taken a neighbourhood approach, working with the community to address concerns about traffic volume and its impact on the community. Dulwich has the following schemes:

### Experimental measures overview map



This framework was not made available to the commission to consider as it is not far enough advanced and the GLA election period has prevented consultation with residents and publication. It has since been published<sup>2</sup>.

The Commission has therefore only been able to focus on limited aspects of the delivery of LTNs and other measures to reduce traffic.

Once the schemes are evaluated the Commission is keen that the council understand the impact on car usage and car ownership, to ensure that LTNs will decrease traffic over time, and thus air quality. The Commission acknowledges that changes to car ownership can take a while to see evidence of

<sup>2</sup> The formal review and consultation of the Dulwich area LTN measures (Dulwich Village, East Dulwich and Champion Hill) commenced on 17<sup>th</sup> May and will run for eight weeks. Details can be found at the following weblink: <https://www.southwark.gov.uk/transport-and-roads/improving-our-streets/live-projects/dulwich-review>

reductions, however previous research is positive<sup>3</sup>. There is detailed and local data available on car ownership, by ward and postcode, supplied by the DLA on a quarterly basis which can be used to monitor trends in car ownership<sup>4</sup>.

## Work with the Emergency Services

Both Southwark Fire Service and London Ambulance Service (LAS) attended meetings and gave evidence. They stressed the importance of good communication, which they said has improved as the pilots have progressed.

LAS said that the combined impact on ambulances of traffic schemes and the pandemic had been very complex with massive peaks and troughs, across London. The cumulative impact of all schemes including LTNs, pop-cycle lanes, school streets, utility works and loss of major infrastructure had impacted on the Trust times. Overall there has been more traffic on the road with an average increase of 2 minutes in response time.

They reported that Southwark Council has implemented a larger number of schemes than most, and in a short period of time, which speaks to a high level of ambition. Crew staff are asked to report any delay due to traffic congestion, road layout or schemes that impact on their ability to respond to patients or egress patients to hospital, for patient safety monitoring. The total number of reported incidences pan London is 171, and in Southwark this is 51. An incident does not necessarily mean something adverse has happened. They gave the commission assurances that Ambulance times remain good in Southwark.

LAS have a preference for cameras rather than physical barriers to prevent circulation. They recognize the benefits of the LTN schemes and are keen to find solutions, emphasizing the importance of the council in continuing to engage closely with LAS during the design phase. The cabinet lead, Cllr Catherine Rose, reported that fortnightly meetings are now established and working well.

Similarly Southwark Fire Service emphasised that the importance of early engagement. The Fire Service priority is establishing attendance times; with a target of the first appliance taking 6 minutes to arrive, and the second 8minutes. They reported that on occasions static barriers had been

problematic; however, they reported that after consultation with the Fire Service these bollards were now moveable. The Fire Service said they did not necessarily have a preference for moveable bollards over planters, in all occasions, and they appreciated costs and other design issues. Their approach has been to visit traffic schemes and look at the route, planters, barriers, access and egress and overall impact of LTNs.

## Recommendation One

**The framework to evaluate the LTNs ought to be provided in full to scrutiny to review, and this ought to summarise work with the Emergency Services, including a section evaluating LAS preference for cameras informed by an analysis of the impact of LTNs on emergency vehicles, response times, different barrier options, and mitigations.**

## LTN's Impact on the Local Economy

Last year the scrutiny commission heard that LTNs have the potential to impact positively on local high streets, if managed well. The Mayor's Covid recovery plan focuses on a Green New Deal, which means High Streets for all, thinking differently and building on localism. Throughout Europe cities are adopting a more local approach, with the Paris 15 minute city being the most famous. Encouraging increased use of local businesses on our high streets ought to form part of the LTN evaluation framework. Successful integration with the local economy will increase the likelihood that communities will embrace these schemes , and strengthening the local economy will mean that some journey destinations will be closer , increasing the likelihood that people to will choose active travel. However the Commission acknowledges this is challenging during the pandemic, with many businesses closed for extended periods.

## Recommendation Two

**When evaluating LTNs the council ought to measure footfall on high streets, where it is possible to establish a baseline. The council also ought to outline work undertaken with traders to ensure that any difficulties (e.g. receiving supplies) are addressed and that the opportunity to maximize footfall and support the local economy is delivered.**

**Longer term the council ought to conduct a longitudinal study with a health partner such as King's College Hospital or Guy's and St Thomas'**

<sup>3</sup> <http://rachelaldred.org/research/low-traffic-neighbourhoods-evidence/>

<sup>4</sup> <https://www.gov.uk/government/collections/vehicles-statistics>

**Hospital NHS Foundation Trust looking at the long term impact of LTNs on the health of residents.**

**Schools impacted by air pollution- particularly schools with high proportion of residents with low incomes and from Black, Asian and Minority Ethnic backgrounds.**

The School Streets programme is established and working well, with over 39 schemes now operational, 31 of which have been implemented this year, which is a huge acceleration in the programme. The council is aiming to install 60 schemes and has contacted every school in Southwark.

School Streets are aimed at making the roads around local school safer and less congested, by reducing driving. This is a key priority in tackling air pollution, as children are particularly vulnerable.

A recent GLA report showed an 18% reduction in people driving to school<sup>5</sup>. This is an encouraging finding but there is more work to be done to get a modal shift to active travel.

The Commission is keen that this work is expanded and that there is additional work with those schools located in areas of high pollution, particularly with low income and Black, Asian and Minority Ethnic children and young people, given the higher health risks face by these populations. The GSTTC schemes are a welcome complement to the School Streets programme.

### **Recommendation Three**

**The Council should conduct an analysis of schools that might be more disproportionately impacted by air pollution compared to other schools (looking in particular at schools with higher proportions of students on free school meals or with students that have English as a Second Language)**

**Where these schools are on main roads, the analysis should identify actions that can a) be tied in with the Low Traffic Southwark strategy to reduce traffic on those main roads and b) mitigate the impact of that traffic in and around the school itself.**

**More generally and in the longer term strategies are required to build on School Streets and to**

<sup>5</sup> <https://www.london.gov.uk/press-releases/mayoral/schoolstreets-improve-air-quality>.

**ensure that walking and cycling are increasingly built into the whole journey to school as part of the Movement Plan and that the number of and proportion of driven journeys are continually being reduced.**

**Increasing Public Transport provision around the Aylesbury Estate and in the south of the borough**

The commission is concerned that excessive parking levels are envisaged as part of the regeneration of the Aylesbury Estate, rather than a focus on increasing levels of Public Transport (PTAL) through the life of the regeneration scheme.

The south of the borough is a site of a number of pilot measures to reduce traffic initiatives, including Low Traffic Neighborhoods; however, it is an area with poorer PTAL. LTNs work best where there is good public transport and people can reach amenities easily by walking or cycling.

### **Recommendation Four**

**Focus on increasing PTAL in regeneration areas and where levels are low, e.g. the south of the borough, in order to reduce parking levels in new developments as close to zero as is possible**

**Measures to Encourage Active Travel with People Who are not Presently Using Cycling and walking to get around**

The first Covid 19 lockdown saw a very significant rise in cycling rates and sale of bikes as people have sought safer ways of getting about and made the most of periods of reduced traffic. The Commission heard that the council is rapidly scaling up the provision of cycle hangers, which is welcome news.

In early summer 2020 the government announced that despite fewer people travelling overall during the crisis, there had been a 100% increase in weekday cycling and at weekends the increase has been up to around 200%, compared to pre-COVID-19 levels<sup>6</sup>. There is also evidence that new cohorts of people are taking up cycling.

<sup>6</sup> The Department for Transport data measured cycling levels for the tightest lockdown period, spanning March 16th to June 1st, which was indexed against the equivalent day of prior years' data. See: <https://cyclingindustry.news/cycling-levels-up-by-up-to-300-during-uks-lockdown/>.

However there are still too many women in the UK who feel cycling "is not for them". The 2019 Sustrans Bike Life survey found that 76% of women in the UK never cycle and only 9% cycle regularly compared to 21% of men who cycle regularly, with women from ethnic minorities least likely to cycle. Similarly only 9% of disabled people regularly cycle, compared with 17% of able bodied people<sup>7</sup>.

Given that women are more likely to use several modes of transport and trip-train (multi stop journeys); more attention also needs to be paid to linking up safe cycle bike routes with other forms of transport, with greater provision of secure and well lit cycle parking and hire at transport hubs.

The Bike Life survey found that top barriers to broader participation are: safety, weather, confidence and storage and living close to the destination. People wanted an increase in more traffic-free cycle routes away from roads (e.g. through parks or along waterways), as well as more cycle tracks along roads which are physically protected from traffic and pedestrians from cars and cycle routes on quiet roads.

There was an appetite for extended hire options including access to cargo bikes and adapted cycles (e.g. tricycle or recumbent cycle).

There are a number of GLA / TfL schemes that specifically seek to broaden the profile of cycling, these include a detailed programed, centered on three themes:

- Streets that enable cycling: Londoners need safe, accessible routes that are not dominated by motorised traffic.
- Making it easy to get around by cycle: making a cycle journey should be as convenient as any other mode of transport.
- Promoting cycling for all Londoners: work with schools and communities to remove barriers and change perceptions about cycling.

Southwark also has a number of schemes including cycle proficiency training in schools that address confidence.

The commission believes that more work needs to be done to broaden participation including an analysis of gender and other inequalities to inform our existing cycling infrastructure, and how to take other needs into account and that we need to build

a cycling infrastructure that is explicitly feminist, informed by diverse and representative viewpoints.

### Recommendation Five

**There is evidence of a far broader demographic being attracted to cycling during the pandemic as traffic levels have fallen. Targeted work is needed with women, low income, older people, disabled people, children and young people and some Black, Asian and Minority Ethnic communities to understand the barriers to participation and the actions that will increase cycling rates, including ensuring the wider cycling infrastructure is inclusive.**

### Work to Reduce Emissions Caused by Online Shopping and Increase Sustainable Freight

Freight is responsible for a quarter of air pollution in Southwark and the council is increasingly engaging with this agenda.

The GLA officers told the commission that they are promoting sustainable freight with large companies such as UPS and DHL, who are working on consolidating their electrical fleet.

Some people in the gig economy, who work for delivery companies, have also benefited from the Mayor's London wide scrappage scheme.

Southwark officers reported that it is larger companies that are making the switch as they have the capacity to invest in expensive new technology. Sainsbury's is one such company, and they have found it as quick to use cycle freight to deliver food as vans. The council is working with local hospitals to encourage the switch to freight. However, officers reported that smaller companies are finding it harder to make the switch for two reasons; the first is that the freight industry has a small profit margin so this makes it difficult to be flexible. The other barrier is the lack of distribution sites in the north of the borough, because of the higher rent and the low profit margin.

Team London Bridge has been funded to promote cargo bikes in the most commercially viable location in the borough. After 2 years they have secured their first contract with a business.

In addition to the above the Commission thought a scheme where businesses could try out trailers and e cargo bikes, to see if these were right for their business, prior to investing, was proposed, as this could demonstrate the amount of bulky freight that it

<sup>7</sup>[https://www.sustrans.org.uk/media/5942/bikelife19\\_aggregatedreport.pdf](https://www.sustrans.org.uk/media/5942/bikelife19_aggregatedreport.pdf)

is possible to move by bike. A similar approach has been used successfully in Waltham Forest to encourage take up of e cargo bikes. Officers cautioned that it could be complicated and expensive to deliver something like this during a pandemic with limited resources.

The Commission considered evidence that cities around the world are setting up schemes to address the pollution caused by the 'last mile'. The end of the journey, often through residential areas, of products increasingly purchased online, particularly for same-day and next-day delivery. These tight delivery slots lead to repeated journeys by vans into busy city centers, often at the height of rush hour. Cities such as Montreal, Berlin and the City of London are setting up pilot hubs in the city to receive packages, which are then delivered using special electric cargo bikes.<sup>8</sup>

### Recommendation Six

**Work with Business Improvement Districts to deliver Nests to enable hubs to receive, and then deliver the 'last mile' of online shopping by e cargo bikes.**

**Follow up on Recommendation 15 of the Air Quality report and understand how sustainable freight is being worked into other Southwark strategies including the Movement Plan, as part of regeneration schemes and if the council is using sustainable freight for in-house services, where possible.**

### Recommendation Seven

**Implement a pilot e cargo hire scheme in 2022, once the current focus on LTNs and school streets is embedded, and we are firmly in recovery from the pandemic.**

### Delivering Low Traffic Southwark and Responding to Previous Recommendations

The previous Air Quality scrutiny review made a number of recommendations focused on driving down traffic overall with work on reducing traffic volumes on main roads needed to compliment the delivery of LTNs.

The amount of work involved in staff delivering the LTNs, as well as the more ambitious vision of

reducing emissions, and thus private car use, over a shorter time period due to the climate emergency, has meant that a complete response to all the previous recommendations, and a revised Movement Plan has not been yet been provided.

While recognizing the constraints on member and officer capacity and the huge amount of work undertaken in recent months, to obtain a clear picture of the strategy for addressing Air Quality in Southwark the Commission needs to:

- understand the plan for delivery of the recommendations of the previous Air Quality scrutiny review (see below)
- Be able to scrutinise the proposed Low Traffic Southwark strategy
- Be able to scrutinise the revised Movement Plan.

### Recommendation Eight

The commission therefore recommends that once the LTN review is completed that more time is given over to responding to each of the commission's previous recommendations and that officers and cabinet leads return to the commission with a detailed operational plan outlining how Low Traffic Southwark will be delivered and provide a full response to the below:

- 1) **Develop an operational plan with partners to implement the Movement Plan, focusing on structural changes, informed by the ambitions of the Movement Plan and its associated deprivation data.**
- 2) **Viability testing of the target to reduce traffic by 90% by 2030**
- 3) **End the current diesel contract for Southwark fleet vehicles and switch to EV as soon as possible. Swap EV for sustainable transport / freight. Revisit our procurement strategy to ensure subcontractors have EV or a sustainable fleet. Set a cut-off date for compliance so that subcontractors have time to make the switch. (marked to be considered in the cabinet response to the first report)**
- 4) **Southwark adopts a maximum charge for bike hubs/hangers that ensures that is cheaper than car parking by space (marked to be**

<sup>8</sup> <https://www.theguardian.com/cities/2019/nov/04/can-nests-and-eco-bikes-reduce-the-environmental-impact-of-parcel-delivery-in-cities->

considered in the cabinet response to the first report)

5) An update on charging for parking in the borough including the development and implementation of the emissions based charging policy and if this will include reductions in car parking provision. The commission recommended that this policy looks at the parameters of vehicle size, fuel, and multiple vehicles per house.

6) A borough-wide greenery programme to use native hedges to screen to against air pollution, ecological planting and also improve the environment and place making. Examples include allotments and wildlife sanctuaries. (marked to be considered in the cabinet response to the first report) In addition the commission would like to see a focus on more ecologically friendly maintenance of housing estates, including less mowing of grassy banks and verges. Green waste also ought to be converted to compost, see Earth Cycle<sup>9</sup>.

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<sup>9</sup> <https://earthcycle.co.uk/about>



# Planning and Environment Review Report

Environment Scrutiny Commission  
July 2021

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# Executive Summary

The report summarises the commission's investigation into Southwark's built environment to improve the quality of its environmental policies in development as well as its performance against current planning policy objectives with respect regard to the environment. We observed that in order to positively impact on Southwark's built environment and address the Climate Emergency, that the council reduce embodied carbon over time as well as improving the environmental impact of schemes over the whole lifecycle of a building. We found the need for this to be done through ambitious action being taken by the council to reduce carbon, pollutants, safeguarding scarce resources and improving biodiversity in the context of planning.

# Summary of Recommendations

## Recommendation One

Ensure the NSP and associated planning documents accord with the Climate Strategy by December 2021, by having policies in place that:

- Meet Net Zero carbon by 2030
- Devise targets on embodied carbon in construction to meet net zero targets in developments
- Increase the number and quality of trees in the borough
- Support provision for food growing spaces and distribution
- Increase green space and green corridors across the borough
- Priorities air quality improvement actions that also have a carbon reduction benefit
- Support active travel (walking, cycling and public transport) and reduce reliance on private travel by motor vehicle

## Recommendation Two

A completion certificate ought to be required with Building Control issuing this, coordinated with Planning, and this ought to ensure that the environmental standards set out in the planning application are met.

## Recommendation Three

Encourage all developments to contribute to the development of Decentralised Energy (DE) networks, including by connecting to them where there is one in proximity to the development, alongside mandatory requirements for significant developments.

## Recommendation Four

Establish a policy and agreed process for allocating the Carbon Offset Fund to projects at pace, and in line with the Carbon Emergency, and by December 2021 at the latest.

## Recommendation Five

Planning adopt the Energy Hierarchy (retain, refurbish, reuse/ reclaim, remanufacture, recycle) in the New Southwark Plan for both development and our own council house building programme.

## Recommendation Six

That greater scope is given in NSP site descriptions to the re-use of existing buildings and that support is also given to retention, refurbishing and repurposing of existing buildings and increasing the density of development on the site without a default to demolition of all existing buildings.

## Recommendation Seven

Develop the public realm to enable active travel and support the local economy including cycle routes, walking routes and pedestrianisation, through amendments to planning policies.

## Recommendation Eight

Use a matrix to promote a mix of amenity provision in local neighborhoods, and judge the capacity of schemes to contribute to a strong local economy, and increases to social and natural capital.



# Introduction

This review was conducted in a shorter than normal administrative year by the Environment Scrutiny Commission. The review picks up from work of last year's Commission, which looked at the Climate Emergency more broadly and identified planning as a key lever in meeting the council's aim of reaching net zero by 2030.

At a macro level Planning sets the policy framework for the borough, impacting broadly on our transport, energy, natural and built environment; all key to reducing carbon over time, and preserving our ecological integrity. At a micro level the planning service and building control functions govern and enforce the amount of carbon a new building can emit and work to ensure it is built to high environmental standards.

# Review Aims

The review seeks to principally influence Southwark's planning service in order to improve the quality of Southwark's environmental policies in development; performance against current planning policy objectives; and delivery of the planning service.

The overriding aim of the review is to positively impact on Southwark's built environment and address the Climate Emergency, with specific reference to reducing carbon, pollutants, safeguarding scarce resources and improving biodiversity.

# Who the Commission took Evidence from

- i. Planning Officers
- ii. Ann Griffin, a member of Southwark's Design Review Panel, Director of Architects Collaborative and Mina Hasman , Skidmore, Owings & Merrill, who is group lead for the Cross-Industry Action Group, who instigated the Climate Framework. Mina is also on the board of UK Green Building Council.
- iii. Southwark Planning Network, with Paula Orr and Richard Lee.



# Themes

## Align Planning Policy with Climate Emergency Strategy

Southwark Planning Network commended the ambition of the draft Climate Emergency strategy but raised concerns that the Council has not yet brought forward alterations to the proposed New Southwark Plan (NSP) that address significant changes required by the draft Climate Emergency Strategy to meet net zero by 2030. These are:

- Enforcing targets on embodied carbon from construction to meet net zero
- Increasing the number and quality of trees in the borough
- Provision for food growing spaces and distribution
- Increasing green space and green corridors across the borough
- Prioritizing air quality improvement actions that also have a carbon reduction benefit.
- Near zero car parking in new developments.

The architects the commission took evidence from also supported the ambition of the council's Climate Emergency work and stressed the importance of finding ways of integrating documents and approaches to meeting the Climate Emergency. Ann Griffin, Director of Architects Collaborative, highlighted how a range of inconsistent and misaligned regulatory functions and policies, which are working to different standards, make it more difficult to set coherent environmental standards.

They also highlighted the importance of reducing embodied carbon over time, and that as efficiency improves this will become more important. They emphasised the importance of requiring developers to tackle the carbon created in construction and through life cycle of the building, not just carbon emitted once the building is complete.

Officers outlined how the New Southwark Plan (NSP) was developed as the council was growing in awareness of the Climate Emergency, which was then declared in 2019. Once the NSP is agreed then the plan is to do a review to catch up to the Climate Emergency strategy. For example, the NSP contains an energy policy that is aimed at zero

carbon by 2050. Officers are intending to update this Energy policy with one that will deliver zero carbon by 2030.

The NSP is presently going through an examination in public. The examination in public commenced with the publication of the plan early 2020. Following feedback from inspectors an updated version was consulted on in the autumn 2020, with hearings in public happening now, spring 2021.

Planning officers also intend to develop several supplemental environmental policies once the NSP is approved.

## Recommendation One

**Ensure the NSP and associated planning documents accord with the Climate Strategy by December 2021, by having policies in place that:**

- **Meet net zero carbon by 2030**
- **Devise targets on embodied carbon in construction to meet net zero targets in developments**
- **Increase the number and quality of trees in the borough**
- **Support provision for food growing spaces and distribution**
- **Increase green space and green corridors across the borough**
- **Priorities air quality improvement actions that also have a carbon reduction benefit**
- **Support active travel (walking, cycling and public transport) and reduce reliance on private travel by motor vehicle**

## Achieving Net Zero in Development

The architects who gave evidence, Ann Griffin and Mina Hasman, recommended that Planning work with Building control to ensure that high pre construction carbon conditions on paper achieve net zero in practice, as these are not always realised in the final building.

In their presentation they recommended three integrated steps:

- Planning: consent to high pre construction carbon conditions on paper that achieve net zero.
- Utilise Building Control to ensure planning standards are met on site. This is innovative and practical, ensuring that buildings actually meet the carbon standards set down on paper. Ann Griffin warned that there is too much value engineering and exploitation of loopholes that mean standards are not achieved. A completion certificate ought to be required with Building Control issuing this, coordinated with Planning.
- External stakeholders and community are engaged. The progress here with declaring a Climate Emergency was noted and the architects gave the example of Low Traffic Neighbourhoods, which came in part from community organisation, as an example of an approach with engagement from multiple stakeholders.

They emphasised the importance of the above three recommendation being fully aligned. A completion certificate would build on the existing work of Building Control, who currently have a role assuring standards, but work to lower ones.

The recommendation builds on this role, which would be clearly defined to developers, and enables checking that the carbon standards set down in Planning have been met. Other boroughs are considering a similar step, and have been doing so for the last several years but this has not yet been implemented. Completion certificates were part of the Future Homes policy framework proposed by the early Coalition government several years ago, but were not realised at that time.

Planning officers reported to the Commission that there is already coordination between Building Control and Planning, who are in the same management team and liaise regularly regarding a completion process, which happens at the point of allocation of street name.

## Recommendation Two

**A completion certificate ought to be required with Building Control issuing this, coordinated with Planning, and this ought to ensure that the environmental standards set out in the planning application are met.**

### Saving More Carbon on Site

Planning Officers told the Commission that they are looking for more carbon to be met on site. However, they also viewed the Carbon Offset Fund as an opportunity to retrofit older houses, which are leaking the most energy.

It is certainly true that insulation and retrofitting of all council owned properties, particularly prioritising homes with most risk of fuel poverty, is an important step in meeting net zero, nevertheless the Commission are keen to see more ambition here. Members suggested that meeting the Passivhaus standard for our own new council homes ought to be achieved and that the council ought to move towards zero carbon, without offsetting, for private development.

Officers pointed out the particular difficulties of high rise schemes, which are above 8 floors high, as these are much more of a challenge to reach zero carbon than lower level housing. It is recognised by leading structural engineers, such as Arup, that high rise are a technical challenge. One of the methods they propose for achieving this is to connect developments to district energy systems with micro grid schemes<sup>1</sup>.

Southwark Planning Network recommended that more use is made of Decentralised Energy networks, and that these are also a way of ensuring low-carbon and low-cost energy and can contribute to reducing fuel poverty.

They reported that the NSP proposes to extend the Decentralised Energy network based on SELCHP from Bermondsey to cover additional Council properties in Old Kent Road and Peckham.

Officers reported that NSP policy P69 Energy requires all significant development to contribute to the development of Decentralised Energy networks, including by connecting to them where there is one in proximity to the development. The Commission would like to see this expanded so that all

<sup>1</sup> <https://www.arup.com/perspectives/how-can-we-make-zero-carbon-high-rise-a-reality>

developments are encouraged to contribute to the development of Decentralised Energy (DE) networks.

### Recommendation Three

**Encourage all developments to contribute to the development of Decentralised Energy (DE) networks, including by connecting to them where there is one in proximity to the development, alongside mandatory requirements for significant developments.**

### Carbon Offset Fund

Carbon offset payments have been revised in line with the London Plan from £60 per tonne to £95 per tonne, which is welcome.

The council has received £1,933,249 in Carbon Offset funds since 2016; however this has not yet been allocated to schemes that will save carbon. In addition, according to a GLA report, Southwark has a further £4,868,915 carbon offsets in the pipeline; which are secured by legal agreement, but not yet collected<sup>2</sup>.

Work has been undertaken to develop a policy and method for allocating these funds; however this has not been completed. A policy is due to be included in the Climate Emergency strategy. Delays in allocating funds mean more carbon is emitted, that could be saved, if the allocation process was expedited.

### Recommendation Four

**Establish a policy and agreed process for allocating the Carbon Offset Fund to projects at pace, and in line with the Carbon Emergency, and by December 2021 at the latest.**

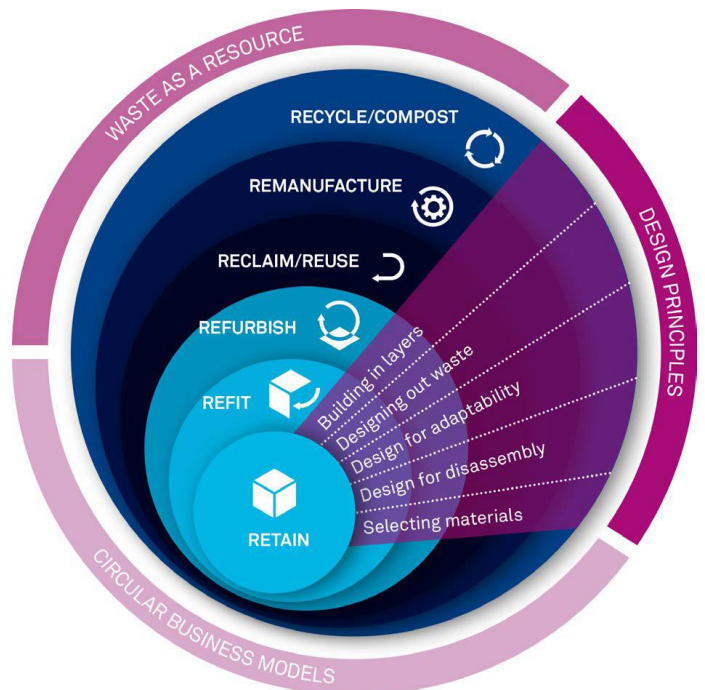
### Energy Hierarchy and the Circular Economy

The Southwark Planning Network commented that presently the NSP suggests an energy hierarchy for new development: energy efficient design and construction; low carbon energy supply; on site renewable energy generation and storage.” (p147). However, repurposing existing buildings is not mentioned in the NSP – when in their view it should be first in the energy hierarchy. They said that there

appeared to be a willingness on the part of the Council to discuss with interested groups an approach to encourage developers to consider refurbishment of buildings before demolition. Southwark Planning Network recommend Southwark require developers to consider options for reusing or repurposing existing buildings before applying for permission for demolition and new build.

Southwark Planning Network also raised concerns that the council has one of the largest demolition programmes in London. This may be in part because Southwark has one of the largest council house building programmes in the country and also uses development to drive increases to transport provision such as the Bakerloo Line.

London’s Circular Economy route map, produced by the London Waste and Recycling Board (LWRB), notes that one of the challenges facing London is to provide access to the housing, business premises and infrastructure that the capital’s residents and workers require – but in an efficient and sustainable way. In building terms this is best met by this hierarchy: retain, refurbish, reuse/ reclaim, remanufacture, recycle.



Above: Building Revolutions: applying the circular economy to the built environment, David Cheshire (AECOM), RIBA, 2016Ref: Building Revolutions’ (2016), David Cheshire, RIBA Publishing

<sup>2</sup> Page 11

[https://www.london.gov.uk/sites/default/files/2020\\_carbon\\_offset\\_survey\\_monitoring\\_report.pdf](https://www.london.gov.uk/sites/default/files/2020_carbon_offset_survey_monitoring_report.pdf)

Planning Officers reported that they are working towards adopting the principles of the Circular Economy as laid out in the GLA document<sup>3</sup>, which draws upon the work of LWRB.

The challenge is how the council can continue to deliver more homes, including more council and social housing, and enhance the transport infrastructure, while reducing the emissions associated with building. Adopting an Energy Hierarchy is one way of embedding these principles in policy.

### Recommendation Five

**Planning adopt the Energy Hierarchy (retain, refurbish, reuse/ reclaim, remanufacture, recycle) in the New Southwark Plan for both development and our own council house building programme.**

### Recommendation Six

**That greater scope is given in NSP site descriptions to the re-use of existing buildings and that support is also given to retention, refurbishing and repurposing of existing buildings and increasing the density of development on the site without a default to demolition of all existing buildings.**

### The 15 Minute City

The '15-minute city' proposes a city in which all the essential services and products that people need can be accessed by a walk or bike ride of no more than 15 minutes.

Changes to the way people are working due to the pandemic potentially support more localization. The 15-minute city can also support Covid-19 economic recovery, and the local economy.

Low Traffic Neighborhoods, which are being piloted by Southwark in 12 areas, are often complimentary to the 15-minute city concept. Additional measures to support the 15-minute city in Southwark planning policies would be traffic-free zones and pedestrianized areas as part of the public realm surrounding major developments. These are not mentioned in the NSP policies.

Commission members noted that developments reaching planning committee often prioritize shop

fronts for cafes, because of the greater revenue generated, however a mix of amenity is needed.

Southwark Planning Network proposed using different benchmarks to assess buildings and proposed alternative metrics, not just commercial, for example increases to social and natural capital.

### Recommendation Seven

**Develop the public realm to enable active travel and support the local economy including cycle routes, walking routes and pedestrianisation, through amendments to planning policies.**

### Recommendation Eight

**Use a matrix to promote a mix of amenity provision in local neighborhoods, and judge the capacity of schemes to contribute to a strong local economy, and increases to social and natural capital.**

<sup>3</sup> <https://www.london.gov.uk/what-we-do/regeneration/advice-and-guidance/about-good-growth-design/design-circular-economy>.





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