

Thank you for the opportunity to comment on the IIA Scoping Report (IIA SR) for the Mayor’s London Environmental Strategy.

My comments on behalf of Just Space are as follows:

Engagement and Consultation:

The Mayor should reflect on the Supreme Court’s endorsement of basic requirements of a ‘fair’ consultation exercise, namely the ‘Gunning principles’, in October 2014. These include, that consultation should take place when the proposal is still at a formative stage. However, the current Scoping Report is not to be found on the publicly accessible GLA website. And public consultation of the IIA Report alongside the draft London Environmental Strategy is not to take place until ‘Stage D’ (section 3.4 fig.3 pp14-15) in Spring 2017 (section 8.1.4 p114). This is far too late in the process given the aforementioned principles. Again ‘Stage B’s developing and refining alternatives and assessing impacts’ (section 3.4 p14) is not planned to be open to wider public consultation. The judgement also observed that fairness will require sometimes that interested persons be consulted not only on the preferred option but also upon arguable but discarded alternative options.

The IIA SR’s objectives and guiding questions have been assessed in relation to the Environment Workshop (17 Nov 2016) of the GLA A City For All Londoners stakeholder engagement programme to see if the points raised in the sessions have been adequately considered by the IIA SR. In many instances, workshop points raised have not been addressed and some will be identified in this response. That the process is not taking on board comments already collected by the GLA generates, to say the least, a disappointing perception of the process.

Proposed Approach to the LES (section 2.3), Purpose, Approach to IIA (chapter 3) and general comments:

The Scoping Report claims that the IIA process and LES will be an integrative one, addressing other cross-cutting themes, including health, equality, etc., having recognised the 3 pillars of sustainable development, and that the process incorporates the statutory requirements of SEA, SA and Public Sector Equality Duty. However, many of the objectives and guiding questions for each topic do not address each of these stated components of the process (such as equalities or health). In particular, equalities impacts are under-represented in the IIA SR. It is pertinent to note that the Mayor advances the ‘Fair and More Equal City’ through his vision for London, ‘A City for All Londoners’. For the IIA to be effective, all of the stated components of assessment should be given appropriately adequate weight in order that the objectives and guiding questions are properly devised. Again, many of the objectives and guiding questions are too vague, ambiguous or do not adequately consider the issues at hand to enable effective specific and measurable assessment of any proposed policies/strategies. There are inter-dependencies or synergies which are not explored because of the compartmentalised nature of the objectives and guiding questions.

Health and Health Inequalities:

In preparation for consultation on the emerging Mayoral strategies, this IIA Scoping Report offers an insight into the perceived issues and likely strategies associated with the environment and health in London. But their analysis in this IIA Report has been found wanting. In its current form it writes of environmental and health issues in overly general and vague terms, obscuring the complexities and specific health issues/needs of diverse groups.

Given that the IIA framework is consistent for all Mayoral strategies and includes common objectives to be used for the assessment stage of the IIAs for each strategy (section 1.3 p8), it is critical to get this correct. An inadequate focus on the socially and spatially differentiated health needs of *all* Londoners results in limited and damaging health outcomes. To become more valuable, the IIA Scoping Report should ask about those issues and groups that need to be included within the strategies that are not yet recognised. There is a need for a greater acknowledgment of the central relevance of health across the IIA. The Case Study below illustrates the need to deepen the analysis.

Chapter 5 - Baseline Information and Key Sustainability Issues in London (section 5.3.3 pp. 70-74)

While the brief overview impressively covers a lot of ground, it could with advantage outline more groups that should be addressed, especially minority groups within London. For example, the LGBTQI community and young people are not mentioned at all, despite there being pertinent (and specific) health issues for those groups. Dietary health is a concern for young people in London. Air pollutants also, which is identified, though not in regards to its long term impacts, and the potential harm it is doing to today's young population in London, arguable more at risk of exposure than ever before.

Chapter 7 – IIA Framework (p107)

The proposed IIA objective to 'improve the mental and physical health and wellbeing of Londoners...' is an incredibly broad and vague ambition, treating health needs across London as a single picture where in reality there exists culturally sensitive and diverse health needs across different groups and locations which are not necessarily captured by '...to reduce health inequalities across the city and between communities'. The adoption of more appropriately formulated guide questions would assist in recognising particular health issues and groups, protected or otherwise.

Case Study - London Gypsies and Travellers

A fundamental limitation with the IIA Report lies in the way in which it deals with health in such narrow and singular terms, failing to discuss the differentiated health needs, issues and outcomes that occur across a wide variety of groups and individuals within London. Despite the Mayor's continual promise to be the champion of 'all Londoners', it is unfortunate and damaging that these diverse health issues and needs across groups and individuals are not addressed to the degree warranted. In the 'Key Issues' (Chapter 6 p96), the only acknowledgement of this is in the incredibly vague reference to the issue of 'differentials in health determinants of different people'.

One group within this category of 'different people' are gypsies and travellers, a minority group in London with the a life expectancy 11 years lower than the average Londoner and persistently identified as having 'bad or very bad' health in 15% of their population (cf. 5% on average for Londoners) (LGTU, 2016). Gypsies and travellers have specific health needs, related to mental health issues such as depression as well as alcohol and drug abuse. Moreover, insecure tenure and a precarious existence in poor quality accommodation disproportionately impacts on gypsies and travellers in terms of both mental and physical health.

As well as specific health 'issues', tackling these outcomes requires much more than the IIA Report currently judges in its overly general perspective. A more complex landscape of health inequalities exists in reality across London and culturally specific approaches are essential. For example, gypsies and travellers care for elderly within their family, rather than seek residence in a care home, influencing the types of healthcare required for this group compared to other parts of the population. Another instance exists around gypsy and traveller women rarely breastfeeding their children, with impacts for targeting childcare policy in early years. Indeed gypsies and travellers themselves have cultural differences in health needs and requirements within this category, such as between Irish and Roma gypsies.

Therefore, this case study only briefly illustrates the ways in which the generalised terms of the IIA Report are inadequate for scoping the issues to be addressed in the IIA and the approach in assessing them. Its framework of objectives and guide questions are deficient.

Materials and Waste

Waste issues raised within the GLA Environment Workshop have been adequately recognised within the IIA SR, but concerns, however, remain in the specificity of how these are managed in the IIA process. Whilst both the GLA Environment Workshop and IIA SR do reference the Circular Economy, neither has adequately unpacked this concept given its growing prominence in emerging policy-making.

There is the potential for internal tension/conflict within the objective (p105) which arises from the sustainability issues of section 5.2.7.1.2 (pp45-46) emphasising achieving recycling performance as well as the introduction of the Circular Economy. Within the Circular Economy concept, recycling may be the least sustainable solution when compared with the other Circular Economy principles such as reduction and reuse. The Circular Economy concept

is not without issues: it is often more expensive to manufacture durable long lasting goods than disposable versions and, therefore, can present a cost barrier to equal participation. It could also fail continue to maintain quantitative economic growth, perhaps, facilitating a transition to a de-growth path (less resource use with increasing wellbeing). In the guiding questions, economic opportunities should not only arise to businesses, but also in terms of widely distributed jobs given the inclusion of job creation as possible benefits (p46).

Both the objective and guiding questions (p105) should have more precise proportionate values rather depending on such imprecise phrases a 'for as long as possible' and 'sustainable'. These phrases do not have the specificity or measurability promised in section 7.1 p100.

Climate Change Adaptation

The guiding questions (p103) should seek more positive benefits/improvements to arise from the interventions and policies that are proposed.

Climate Change Mitigation

There is little mention of how 'zero carbon London by 2050' will be defined or measured (c.f. 'need to be specific and measurable' section 7.1 p100). There are several different definitions of what 'zero carbon' urban areas can look like, with varying scopes taken into consideration. Some definitions emphasise the total emissions associated with the economic activity of the city. Others confine it to emissions within a specific geographic area. It is not specified, for example, whether London's airports are factored into calculations or if emissions generated outside of London's borders for services and utilities used within the city are counted. It has been estimated that it takes up to 300 times the area of the GLA to sustain London with resources. The lack of clarity on this scoping undermines the stated aim of the IIA process to be an integral part of good strategic development (section 3.1 p12). If the scope of the indicators relevant to emissions reduction that will be devised remain as unclear as they are now, it may have serious consequences regarding the performance of the LES for the achievement of sustainable development.

The GLA Environment Workshop of November 2016 stated that ensuring a contribution to the Paris Agreement global goal of 1.5 degrees C maximum temperature rise was to be a part of the LES. So far this has not been mentioned in the objectives or guiding questions. If indeed this remains an aim of the LES (section 2.2 p10) (and it is strongly recommended that it should), then having a wider scope by which a zero carbon London is defined will help move towards this goal. It will help ensure sustainable practices along supply chains that culminate in London and that the extended and regional character of London's economy is adequately reflected in its environmental strategy.

The guiding questions for Climate Change Mitigation should recognise that the achievement of sustainable development beyond the GLA boundary should not be compromised by the LES; and, that the inclusion of up-stream emissions, including international freight and passenger transport, should be part of its target calculations for a 'Zero Carbon' London.

Energy Consumption

During the GLA Environment Workshop it was outlined that the existing housing stock contributes to a significant proportion of emissions in the city. Home energy inefficiency contributes to fuel poverty as well as to excess emissions. Retrofitting existing homes to a higher energy efficiency standard is seen as a key strategy for emission reduction. However, this is not fully reflected in the objective and guiding questions (p104); retrofitting should be made more explicit.

Housing Supply, Quality, Choice, and Affordability/Social Integration

One key concept in the GLA Environment Workshop was 'good growth' which includes principle of ensuring neighbourhoods remain 'liveable' as the population of London grows. Many of the issues that surround this concept, such as access to green space, safe walkable streets, and access to transport are included at some point in the IIA SR. However, there is a need to safeguard the position of low income and vulnerable residents in neighbourhoods that score well by these measures of liveability and/or experience 'good growth' who otherwise would be displaced by regeneration/development. On this basis the guiding questions (in either the housing

supply or social integration sections) should assess the safeguarding of existing settled populations of low income and vulnerable groups.

Connectivity

The GLA Environment Workshop voiced concerns at the loss of industrial land, particularly in inner London and the consequential and general increase of goods vehicles on the roads adding to congestion and emissions. While this is in part covered by the objective and guiding questions (p109), the congestion question asks about impact (reduction) across all parts of London. This sets a too geographically extensive test as otherwise acceptable emerging policy could benefit some parts only.

Design/Housing Supply, Quality, Choice and Affordability

Another key concern of the GLA Environment Workshop was that buildings are currently not being designed to last and that the practices of the construction industry are not always environmentally sound. To add clarity and certainty that the objectives and guiding questions (p108) relate to construction as well as to design, construction should be added throughout alongside design. Further elaboration of what is meant by sustainable design and construction is needed. The assessment should be based on a 'whole life' approach which would include the environmental impacts of site clearance/refurbishment options, construction and operation, and end of life /demolition.

Flood Risk

There is a need to ensure that the management of flood risk is 'bought into' by communities and that the policy measures are acceptable to them and also are environmentally appropriate. The guiding questions should be refined accordingly.

Concluding Comments: Transitioning to a Low-Carbon Economy

The IIA SR refers specifically to the low-carbon economy under the Economic section of chapter 5, stating that "The low-carbon economy is going to be one of the biggest global growth sectors in the 21st century". It lists the challenges to transitioning to a low-carbon economy as London's growing population and need for housing, the inefficiency of the current housing stock and high resource use (especially water). However, there are many other factors to consider when planning a shift to a low-carbon economy. The IIA SR discusses many of these factors under other topics, such as Climate Change, Energy Use and Supply, Flood Risk, Materials and Waste, Housing supply, quality and choice and affordable housing, Design, Economic competitiveness, employment, education and skills, Connectivity, Infrastructure, and Sustainable Land Use. Unfortunately though, the connections or inter dependencies between the aforementioned topics and transitioning to a low-carbon economy are not made.

Much of the conversation at the GLA Environment Workshop revolved around how to localize economies to reduce travel needs and to create jobs. While growing local economies would help in the reduction of carbon emissions, it is not *the* answer; it is just *part* of the answer. In order to make this transition, it is imperative that the discourse not only reflects the desire for sustainable economic growth compatible with the social and environmental pillars of sustainable development, but also sustainable energy production, reduction in resources consumption, waste reduction, the innovation of new technologies, the growth of existing low-carbon business models, sustainable investment, job opportunities in the emerging green market, land-use management, construction, infrastructural improvements, individual behavioural change and a shift in social norms. In order to truly achieve this transition the IIA process needs to make the links between the objectives of these diverse elements/topics, not just only formulating and assessing them one by one, but integrating them in order to build beneficial synergies within a coherent overview of the direction of travel.

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