Appendix 4 – Environmental Responsibility and City Greening

1. This paper summarises the potential policy approaches which could be taken in relation to environmental responsibility and City greening.

Context

- 2. The main driver for sustainable development is climate change, affecting global and local businesses, workers, residents and visitors. The pace and prestigious nature of development in the City presents opportunities to incorporate innovative design which positively addresses environmental challenges.
- 3. Social and environmental responsibility is high on the agenda for the emerging millennial workforce; therefore a working environment that supports these goals is essential to attract the City's future businesses.
- 4. The London Plan and the Mayor's Sustainable Design and Construction SPG provide a framework for taking forward this agenda but this must be implemented at a local level taking account of the City's specific circumstances.

Current policy position

5. The current Local Plan has a suite of policies which promote sustainable development, environmental protection and resilience to climate change. Alongside this, policies on waste and flood risk detail how the City Corporation is fulfilling its statutory duties as Waste Planning Authority and Lead Local Flood Authority.

Environmentally Responsible Design

- 6. BREEAM assessments and energy strategies are the main tools used by developers and local planning authorities to assess the impacts that development will have on the environment. Current City Local Plan policy has been successful in achieving BREEAM "Excellent" ratings for the City's buildings, and energy strategies demonstrate increasingly energy efficient and low carbon building designs.
- 7. We will continue to require BREEAM "Excellent" or "Outstanding" for the City's buildings but may wish to develop more specific greening and smart energy policies for the City. Current London Plan Policy requires all new residential development to be zero carbon now and this will be extended to cover commercial buildings from 2019, subject to the London Plan review. Where developments are unable to fulfil these targets on-site, a contribution to the City's Carbon Offsetting Fund will be required. This fund will be ring-fenced for carbon reduction projects elsewhere.
- 8. Carbon reduction must be achieved whilst avoiding negative air quality impacts, ultimately leading to a Zero Emissions City. A trajectory to zero

emissions would identify where technology, behaviour changes and policy interventions will contribute and what part new development and infrastructure should play in this. The City's Carbon Offsetting Fund could be used to support strategic projects which help reduce energy use and carbon emissions in line with the trajectory.

- 9. The Sub Committee is asked to endorse a strategic approach which sets a trajectory to achieve a Zero Emissions City and continues to require high environmental standards for the City's buildings.
- 10. It is imperative that greening, smart energy solutions and resilience to flooding and overheating are designed into the City's buildings and public realm from the outset of the design process rather than being considered when designs are already decided and it is more difficult to make changes. To facilitate this, it is proposed that these issues be incorporated into the building design policies within the Plan.
- 11. The Sub-Committee is asked whether it agrees that the design policies should incorporate environmentally responsible design rather than including a separate set of policies on climate change and sustainability.

Urban Greening

- 12. Local Plan policies have been successful in securing green roofs throughout the City, an approach that has won a 2017 National Award for Excellence from the RTPI. Other forms of greening, however, are less common. A step change in greening of buildings would bring benefits for air quality, noise, temperature moderation, rainwater attenuation, biodiversity enhancement and the physical and mental health of workers, residents and visitors.
- 13. This could be achieved through a new policy requiring a certain proportion of greenery within new development. The Mayor's Draft Environment Strategy indicates that a new Urban Greening Factor (UGF)¹ for London is being developed for potential inclusion in the London Plan. UGF is a standardised method of assessing greening for different building types, which could be adapted to reflect the nature of development within the City.
- 14. The Sub Committee is asked to indicate whether it supports an approach that would seek to deliver a significant increase in greening of the City's buildings and public realm.

Waste Planning

15. As Waste Planning Authority (WPA) the City Corporation has a duty to plan for all waste that is generated in the City. This includes household,

¹ https://www.london.gov.uk/sites/default/files/urban greening factor for london final report.pdf

- commercial and industrial, construction and demolition, hazardous and radioactive wastes.
- 16. There is one safeguarded waste transfer site in the City at Walbrook Wharf but no waste treatment facilities, therefore Waste Planning Authorities elsewhere must provide facilities for treatment of the City's waste. Other Waste Planning Authorities are increasingly restricting waste management capacity to discourage imports of waste from outside their areas and to release brownfield land for other uses, such as housing.
- 17. Waste prevention and circular economy principles form an essential element of future waste management and must be considered in the design of buildings. This could include on site waste treatment, such as anaerobic digestion of food waste, in large developments, reducing the need for transport of waste off-site. This will enable City businesses to fulfil their Corporate Social Responsibility objectives and residents to play their part in waste minimisation.
- 18. The Sub-Committee is asked to indicate whether it supports a Local Plan policy that would promote on-site waste treatment on major development sites.
- 19. Co-operation with other WPAs is essential in planning for efficient and effective treatment of the City's remaining waste. The London Plan requires that the City identifies capacity to manage 100,000 tonnes of waste (subject to review) either in the City or elsewhere in London. The City Corporation has an agreement with the London Borough of Bexley to meet this apportionment within the current Plan period, and participates in a partnership arrangement of WPAs known as the South East London Joint Waste Planning Group. The NPPF requires Local Planning Authorities to co-operate on strategic planning matters including waste planning.
- 20. The Sub-Committee is asked to endorse this co-operative approach to waste planning.