

**London Sustainable Development Commission (LSDC)  
Consultation submission on the LDA Investment Strategy 2009 - 2013**

## **I) Background to the LSDC and Policy Context**

**The London Sustainable Development Commission (LSDC) was established in 2002 to advise the Mayor of London on ways to make London a sustainable, world-class city. The Commission is an independent body advising, supporting and challenging policy makers to promote a better quality of life for all Londoners, both now and in the future, whilst also considering London's wider global impacts.**

**In 2003, the Commission published *A Sustainable Development Framework for London*. This provides decision and policy makers with fourteen overarching objectives that they should seek to achieve with any strategy, policy or project they wish to progress. These objectives relate to the Commission's four areas of sustainable development:**

- Taking Responsibility for the impact of one's actions on other people and the environment, and thinking longer term;**
- Developing Respect for London's diverse communities and for London's environment;**
- Managing Resources more prudently to reduce London's environmental impact and;**
- Getting Results, which achieve social, economic, and environmental objectives simultaneously to improve the quality of life of Londoners now and in the future.**

### **Sustainable Development in London**

**A whole range of environmental, political, economic and social factors affect Londoners' quality of life. The quality, affordability and/or accessibility of these factors, and how they relate to each other, can determine whether Londoners experience a good quality of life or a London of decline and deprivation. Looking to the future, London cannot continue along its current path, where all too often economic, social and environmental improvements are viewed in isolation and are traded-off against one another. This path is intrinsically unsustainable and will have serious long-term consequences for London and the wider world.**

**Sustainable development is about ensuring we have a better of quality of life now and for the future whilst protecting and enhancing the earth's resources. Our vision for London, contained in 'A Sustainable**

**Development Framework for London<sup>1</sup> articulates how this can be achieved.**

**In practice, achieving a better quality of life is about:**

- **Having access to quality education, jobs, services, housing and leisure;**
- **Living in an environment which is healthy, resilient and stable now and into the future;**
- **Living and working within a society which is democratic, just, engaged, diverse, responsible, supportive and vibrant;**
- **Being fulfilled, healthy and with sufficient personal resources to enjoy life.**

**Whether as individuals, communities, businesses or governments, our journey towards sustainability means improving how we think about the social, economic and environmental impacts of everything we do. We must make the most out of available opportunities, designing out negative impacts and minimising them as a last resort.**

**Since sustainable development was first officially referred to in 1987 by the World Commission on Environment and Development in its report, 'Our Common Future', known as the Brundtland Report, sustainability has been conventionally seen as a trade off between the three tiers of social, environmental and economic pressures. Whilst this definition may be useful in looking back it fails to identify the opportunities for integrated solutions in the future.**

### **The Commission's approach to Sustainable Development**

**To understand how to get to grips with sustainability the Commission promotes an integrated approach in preference to the more traditional 3 pillars way of thinking.**

**This approach sees policy makers and Londoners alike taking **Responsibility** for how their actions impact on other people and the environment, adopting an attitude which **Respects** London's diverse populations and environment, and considering ways in which to manage the earth's **Resources** more prudently thereby achieving positive **Results**.**

**We see this integrated approach in terms of a 'virtuous cycle', where it makes more sense if opportunities and impacts, across these four "Rs", are considered together and the benefits become mutually self-reinforcing.**

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<sup>1</sup> [http://www.londonsdc.org/documents/lfdc\\_framework.pdf](http://www.londonsdc.org/documents/lfdc_framework.pdf)

For example, a well designed policy which aims to increase walking and cycling will not only see an increase in **Responsibility** of Londoners for their actions but should also lead to increased **Respect** by targeting all communities in London. The policy would reduce consumption of the earth's **Resources** such as finite fossil fuels thereby delivering broader positive **Results**. These results would include reducing congestion as well as improving health (and reducing health inequalities) through the increase in daily physical exercise.

### **The National context**

The five sustainable development principles of the UK SD Strategy are:

**i) Living within Environmental Limits: Respecting the limits of the planet's environment, resources and biodiversity – to improve our environment and ensure that the natural resources needed for life are unimpaired and remain so for future generations.**

**ii) Ensuring a Strong, Healthy and Just Society: Meeting the diverse needs of all people in existing and future communities, promoting personal wellbeing, social cohesion and inclusion, and creating equal opportunity for all.**

**iii) Achieving a Sustainable Economy: Building a strong, stable and sustainable economy which provides prosperity and opportunities for all, and in which environmental and social costs fall on those who impose them and efficient resource use is incentivised.**

**iv) Promoting Good Governance: Actively promoting effective, participative systems of governance in all levels of society – engaging people's creativity, energy, and diversity.**

**v) Using Sound Science Responsibly: Ensuring policy is developed and implemented on the basis of strong scientific evidence, whilst taking into account scientific uncertainty (through the precautionary principle) as well as public attitudes and values.**

**One of the ways the LSDC assists the Mayor to set priorities for improving London's sustainability is to provide comment to the GLA family in relation to corporate and investment plans. This submission is part of this assistance. We have used the above sustainability frameworks to inform our thinking.**

## **II) LSDC Detailed Response**

**The LSDC welcome the emphasis that the Investment Plan places on reducing London's footprint, and that the concept of living within environmental limits is understood and expressed in the Plan.**

**The Investment Programme is very clear on the focus of the work of the LDA, which is also to be welcomed. However there could be a danger that the integration and interrelationships of the work programmes could be missed, which would mean that the LDA programmes may not be as efficient in terms of delivering a sustainable London.**

**The LSDC is particularly concerned with the emphasis on growth in order to support a recovery in the current economic climate. The LSDC would prefer that the current economic correction is used as a catalyst for real change and this includes sustainable economic progress that is consistent with living within our environmental limits, as defined by PSA7 and contained in the Sub-National Review.**

### **Is the overarching approach right?**

**We question how strong Sustainable Development (SD) is serving as a driver for the plan. We welcome the fact that sustainability is regarded as a cross cutting theme though apart from carbon and climate change other resource implications are not addressed in any detail and the linkages with other aspects of sustainability does not come through strongly.**

**Also, given the focus on the economic downturn and recovery, the LSDC advocate that fundamental changes are needed as part of London's economic recovery, not just a return to where we were: arguably, an inherently unstable economic activity based on social disadvantage and environmental damage and unsustainable rates of consumption.**

**The strategy seeks to secure global competitiveness. *The questions the strategy must answer convincingly are: competitiveness in what? And, where does London want to be as a result given the global and societal pressures, which are to a greater or lesser extent, a product of previous economic approaches?***

**The LSDC do not consider it prudent simply to return to where we were 3 or 6 months or 1 year ago with environmental and social decay and economic disadvantage growing. London requires a different approach some of which is just about attuning existing approaches and skills, some of which requires more fundamental principled change underpinned by strategies, professional standards, codes of conduct etc.**

**The role of economic growth in the Strategy is a case in point. On page 10, the Plan acknowledges that London needs to find a way to decouple growth from waste and carbon emissions, and adopt sustainable patterns of resource production and consumption. We would point to the analysis in Professor Tim Jackson's recent challenge to economic**

**growth in his recent article in the New Scientist<sup>2</sup>. Professor Jackson, who is Economics Commissioner on the UK Sustainable Development Commission, makes the case that pursuing endless economic growth and tackling climate change would require us to reduce the carbon intensity of our spending to a fraction of what it is now – requiring a radical transformation.**

**A specific example of this could be reviewing new approaches to ‘affordable housing’ to support real recovery. The strategy should set out how new forms of affordability will be achieved other than relying on a return to over burdened, debt-ridden housing markets.**

**In PSA 7 the Government states for the first time that its “central economic objective is to raise the rate of sustainable growth”. Sustainable growth is then defined: ‘Sustainable growth’ here and throughout refers to economic growth that can be sustained and is within environmental limits, but also enhances the environment and social welfare, and avoids greater extremes in future economic cycles. (Our emphasis)**

**Therefore the LSDC asks that the LDA consider the pursuit of sustainable economic progress and well-being rather than economic growth per se. We would also be keen to see an explicit analysis of how the LDA’s strategy over the next 3 years will take London closer towards a low carbon economy.**

**Is the policy context analysis correct? Have we missed important policy considerations?**

**Our comments fall into two parts in this section: Policy implications integrated throughout LDA programmes and specific links with Mayoral Strategies.**

**As stated, in welcoming the use of sustainability as a cross cutting theme apart from carbon and climate change other resource implications are not addressed in any detail and the linkages with other aspects of sustainability does not come through strongly. We therefore doubt that SD is used as a strong driver for the strategy and the emphasis that the LDA places on sustainability throughout its projects is therefore weakened and harder to discern.**

**In our opinion whilst important policy considerations are mostly addressed, it is not clear how well projects work together to create a sustainable whole. The Investment Programme is very clear on the focus of the work of the LDA, which is also to be welcomed. However**

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<sup>2</sup> <http://www.newscientist.com/article/mg20026786.100-special-report-why-politicians-dare-not-limit-economic-growth.html>

**there could be a danger that the integration and interrelationships of the work programmes could be missed, leading to LDA programmes being less efficient in their delivery of a sustainable London.**

**We are particularly concerned that the unintended consequences of some projects are identified and adverse sustainability impacts are minimised. One example of how the sustainability of the overall plan could be tracked would be to ensure that a sustainability indicator such as carbon reduction is used across all LDA projects, not simply for overtly environmental projects.**

**Examples of where the plan should make more explicit reference to Mayoral Strategies are the Housing Strategy and Food Strategy. Currently it is not clear that the LDA investment spending will follow the priorities in the Housing Strategy or support the delivery of the Food strategy. We note that the LDA has made a significant impact in support infrastructure around the food agenda, by supporting the publication of the Food Strategy, providing a secretariat for the Food Board and the delivery of support services. Given our understanding that food is a high priority on the Mayor's agenda, and the importance of food to the wellbeing of Londoners we are concerned that there appear to be no food specific projects, or food related outputs in the Investment Plan.**

### **Do we have the right balance of programmes?**

**Again our comments here concentrate on how sustainability is woven into the projects rather than adding to the suite of programmes proposed. We would also request that the next iteration identifies more explicitly how the work programmes would work in partnership with organisations such as the Boroughs or the third sector.**

**We believe that sustainability literacy can be part of medium term recovery and longer-term re-establishment of a vibrant economy, especially if the concept of economic progress and well being are used as part of the regeneration lexicon as addressed above.**

**We are not clear how the London Skills and Employment Board (LSEB) and its recently published strategy are developing skills for sustainability and being linked to the LDA's Investment Plan. An employer or demand led approach may not lead to the development of mainstream sustainability literacy in the workforce. At this time it is not clear how much investment employers are likely to make on recruitment developing sustainability skills. We would like to see the LDA developing a strategy on jobs to incorporate both the supply and demand side including monitoring with quantitative assessments to establish the longevity, type and quality of jobs, including quality of life indicators.**

**More specifically a focus on *skills for sustainable economic recovery*, sustainable finance and responsible banking, would allow London to consider what markets it wants to develop and corner in the future and what existing skills (in banking and finance) can be 'attuned' to this.**

**London's workforce will also need to understand their role in delivering a sustainable London and the LSEB and LDA have a role in ensuring this. The LSDC support the LDA's medium term goal of changing the core skill set and we would advise that these include sustainability with a specific role for the LDA to support the existing workforce to be more sustainable.**

**An SD approach also allows planning of the investment in skills which is needed for other skills such as are required in energy use to be developed – the strategy should plan for how to 'attune' planning, surveying, installation and other skills to the kinds of renewable and sustainable energy London aspires to and requires. This is merely one example of the kind of change in skills sets required for London's workforce to be part of creating a sustainable economy.**

**The Investment Strategy should consider how other pan London organisations, supported by the GLA family can support this programme. The LSDC, The London Waste and Recycling Board, Design for London, London Parks and Open Spaces Forum, the London Energy Partnership, the London Climate Change Partnership (adaptation), the London Hydrogen Partnership and the London Health Commission are some examples.**

**Further research to identify green skills gaps should be conducted by the LDA followed by a set of interventions in the labour market to develop 'green' skills through training programmes and other measures.**

**Businesses in London produce 35% of London's carbon emissions and 89% of London's business are SMEs. The new simplification process makes the environment mandatory, but it remains uncertain how this will lead to businesses actually changing their behaviours. Less engaged, harder to reach businesses are likely to lose out and their carbon emissions remain unchanged. We recommend the guidance and case studies on mechanisms for engagement and behaviour change from DEFRA and the DOH. The current business support programme does not reflect the impact that behaviour has on the overall resource of London's footprint.**

**We welcome the plan's emphasis on partnership but find that it underplays the complexities of working in partnership. Streamlining investment to third sector organisations may deliver casualties in terms**

**of effective outreach to communities and innovation. Smaller organisations may easily be squashed and left with insufficient funds to conduct outreach effectively.**

**More innovative projects may involve an element of high risk. Payment on outcomes alone may be inappropriate. On higher risk projects the evaluation and lessons learned could be a major outcome. An example for this could be identifying the most effective outreach mechanism.**

**Have we identified the right measures for our outcomes?**

**We welcome the move from outputs to outcomes and the emphasis placed on partnership working. We question however how value for money will be judged if an integrated SD approach is not taken.**

**In terms of specific detail the LSDC believe it is important to go for real carbon reduction and not just catalysing others' carbon reduction. The strategy needs to be explicit about how the LDA will ensure that its own projects lead to net reductions.**

**To establish the overall sustainability of programme we recommend that each project be evaluated against a range of sustainability indicators. In this way the unintended consequences of projects will be identified and the sustainability impact maximised. The LSDC have experience of this approach through our work on virtuous cycles, which clearly demonstrate that the integrated approach can benefit a range of project outcomes by helping decision makers plan and deliver objectives in an integrated way. The major advantage is that environmental and social value can be increased at lower whole life cost. The LSDC has commissioned research into a number of case studies, which illustrate the benefits of taking a virtuous cycle approach to policy and project development<sup>3</sup>. The LSDC could support the LDA in creating a process that captures linkages and supports integration.**

**From our partnership work on Local Area Agreements (LAAs) with the London Health Commission, London Councils and GOL, we have also sponsored the development of a tool, which identifies the sustainable outcomes of a project in relation to LAA indicators.**

**As one of the Government's key sustainable development priorities, sustainable consumption and production (SCP) is also a key work-stream for the LSDC. Ensuring that London recovers from this economic downturn in a way that leaves it more resilient to future shocks will require a step change in resource efficiency coupled with changes in**

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[http://www.londonsdc.org/documents/research/LSDC\\_Virtuous\\_Cycles\\_Final\\_Report.pdf](http://www.londonsdc.org/documents/research/LSDC_Virtuous_Cycles_Final_Report.pdf)

**consumption. Delivered in the right way such an approach could bring significant economic and social benefits as well as helping London achieve its carbon reduction targets and eco footprint aims. For that reason the LSDC has completed research on SCP and is currently supporting the development of a series of sector specific metrics, targets and associated high-level actions that could help London achieve SCP. The work looks to measure indirect carbon emissions and therefore complement other studies such as the climate change action plan. We would welcome the LDA's involvement in this work and would recommend that the LDA adopt similar measures of resource efficiency.**

**How can the LDA and others work together better?**

**In terms of ensuring that good partnership models are used in the commissioning process we recommend that the LDA conduct a specific consultation concerning procurement of services, similar to that conducted by the London Councils. Through this process we can ensure that strong partnerships emerge, and that the needs of hard to reach communities are addressed.**

**One mechanism of demonstrating how the LDA projects would relate specifically to National and Borough priorities would be by expressing some projects in terms of borough LAA indicators.**