

**Extinction Rebellion Southwark**  
**17 July 2022**

To Cllr Helen Dennis,

Given our extensive input over the last year to strengthen and improve the council's Climate Action Plan, members of Extinction Rebellion Southwark (XRS) read the new Annual Climate Report and revised Climate Action Plan (CAP) from Southwark Council with interest. We wanted to respond to your six recommendations to Cabinet in the Climate Change Annual Progress Report as follows:

1. **“Notes the progress made since publication of the previous climate change strategy and action plan in July 2021.”**
2. **“Agrees to the publication of the smart action dashboard, as set out in the report, on the council’s website, which highlights the extent of delivery across the council but also the significant funding, resource and expertise gap in achieving net zero by 2030.”**

XRS members also note the improvements vs the original action plan in terms of some of the details we had requested, including: key milestones and potential barriers, who is responsible, whether it is funded, and some broad timelines - although we argue that many (especially those which depend on amendments to the Southwark Plan) do not meet the SMART criteria because they are not measurable and clearly aren't achievable in the next monitoring period.

We welcome the commitment to publish an interactive action tracker online, which will be updated to reflect the latest progress on an ongoing basis, rather than waiting for annual reporting cycles. We hope that the online tracker will allow users to filter and sort the list of actions (e.g. by 'phase of action'). This will help residents to quickly find the actions most relevant to them.

However, our concern remains that this CAP still fails to provide clear decarbonisation targets, or clarity as to how much Southwark expects the borough's emissions to reduce by 2030. It lists actions without an overall understanding of the potential decarbonisation scope of those actions; which we imagine is essential for the council's prioritisation of their work streams.

This requires going a step further than the final column on the CAP, which describes whether an action leads to an indirect or direct carbon saving: Southwark should also provide an estimate of those resultant carbon savings and other co-benefits for the action, and then develop proxy indicators to track that impact using robust data management principles. As an example:

- Action: plant trees in the borough
- Output: trees to be planted (#)
- Outcome: increased shade (% of public space)
- Impact: estimated carbon savings (#) and co-benefits such as improved health (i.e. reduced # of heat strokes)

SMART targets must focus on the outcomes to be delivered, not just on the actions to deliver those outcomes. Decarbonisation is the key outcome. Southwark should publish a carbon savings tracker, alongside the actions tracker, to ensure transparency on progress towards decarbonisation.

**3. “Agrees the approach to reviewing council wide policy and ensuring that climate objectives are built into the council’s wider work as standard.”**

We are concerned that Southwark’s other key plans still are not aligned with the climate strategy or have clear timelines for being aligned with the goal of net zero by 2030. The new draft Air Quality plan does not show correlation to this CAP, while the Movement Plan is being delayed yet again. The review of the new Southwark Plan will especially impact actions in Greener Buildings, Renewable Energy and Thriving Natural Environment. The milestone timeline is ‘2024 TBC’: the distance and uncertainty of this deadline are worrying as there is nothing to hold officers to and no clarity about the steps to complete the action. The emphasis should be on making good the Council’s commitment to an early review to ensure that the Southwark Plan is aligned with the Climate Change Strategy.

Given delays so far, there is a strong case for the Council to separately review each section of the Southwark Plan (e.g. Housing, Biodiversity, Energy) so that overall progress is not held up by delays in addressing individual sections. Progress is likely to be even slower due to national planning reforms, which are likely to deliver net zero policy before Southwark does. We need these significant updates as a matter of priority, and hope that the climate emergency can be a cross-cutting issue which avoids typical council silos. The Action Plan needs to be more agile in finding ways to make rapid progress.

Training remains a significant gap, both in this Recommendation and in the CAP as a whole: training for councillors and council officers, to ensure they can fulfil their constitutional duty of placing climate and social justice at the heart of decision-making. ‘Resource’ is shown as one of the Major Risks to Milestone for many or the majority of the actions across all five areas. Training should be one mechanism for increasing the capacity of existing resources.

The CAP says ‘All people appointed by the council to take care of Southwark must be well-versed in the effects of climate change on people and nature in Southwark’, and that an internal training module will be launched in 2023. This is welcome, yet we strongly advocate that councillors and officers themselves must commit to continually undergoing training. Decarbonisation on this scale is complicated, and it would be good to see more technical training integrating robust carbon monitoring across departments - especially given the council is taking monitoring in-house, and given the range of departments referenced in the Action Plan.

We suggest adding a ‘training’ section under each of the five areas in the action plan, to enable monitoring and assessment of how capacities are being developed. Without appropriate training, the constitutional amendment risks becoming a rubber stamp exercise for any policy including the word ‘climate’, with no review of how it is working and no structured or credible test which policies must pass. We don’t have time for a lack of rigorous scrutiny: the climate crisis is upon us now.

This applies equally with regards to monitoring: the baseline is improved but will need continual updating as information and techniques for measuring contributions improve (this is a field that is developing and changing very fast). It is a worry that the council is dispensing with specialist emissions assessment services when you appear to have such limited internal resources. We echo Anthesis' recommendations in their report that, as the council is now taking emissions reporting 'in-house', the council develop an appropriate means of regular emissions data monitoring across council teams and begin year-round conversations with relevant officers on their data monitoring and reporting techniques, as well as ensure that new projects designed alongside the Action Plan follow robust data management principles in order to properly allow the council to report its progress.

On borough-level emissions, we observe that only emissions within the borough have been counted, rather than emissions from residents which the council can influence like diet and residents driving further afield.

**4. "Agrees the proposed community engagement approach and associated governance structure, which sets out how the citizens' jury process will be utilised to underpin further resident engagement."**

We are unsure from these documents what the proposed community engagement approach actually is. The 'Community, equalities (including socio-economic) and health impacts' section of the Annual Report demonstrates an overall commitment to social justice, but the plans as presented in the Report are too high-level and fragmented, not forming a coherent strategy and implementation plan. There is no information about how the Council is delivering on their commitments set out in the Climate Change Strategy to engage youth, BAME communities, or vulnerable communities. Who are the existing groups and networks you say you will engage with to reach those who haven't been participating in the policy dialogue?

While the CAP includes a number of actions that are good starting points for considerable improvements in tackling the climate crisis while reducing inequality, they need to go further and be supported by a robust monitoring, reporting, and evaluation system that not only tracks emission reduction but also progress on inclusion and equity. We suggest the CAP include a subsection on the Council's overall engagement strategy, what you've done so far, what you have committed to doing, and how this will be achieved (different types of engagement, channels, targeted stakeholders, resourcing, etc.)

Southwark's engagement approach thus far (including the Citizen's Jury) has been fundamentally flawed as it is not tied to emissions reductions or the necessary trade-offs involved in decarbonisation, and is instead creating an ever-growing list of nice-to-haves. We hope future community engagement is based on honest assessments of what will deliver lower emissions and greater equity.

Lastly, we would ask the climate emergency team what plans are there to engage on the following:

- The recycling strategy, which the CAP says will be approved by October - does this include a timeline for public engagement?

- A Southwark Climate Adaptation strategy, which is essential and long overdue as extreme weather events become more common
5. **“Notes the significant amount of revenue and capital funding now allocated in support of the action plan, and agrees to explore every route to attract and maximise additional resources for the Climate Emergency.”**
  6. **“Agrees to proceed with additional allocations from the Climate Capital Fund to deliver projects in line with the climate action tracker and some priorities set out by the Citizens’ Jury.”**

It is good to see that funding is in fact available for many actions. However, as above, we remain concerned that without robust monitoring, reporting and evaluation of the climate and equity impact of these actions, the council is not being transparent about which policies will lock-in the most carbon savings and other co-benefits. Without this, how can we be sure that the Climate Capital Fund is being spent efficiently? We have to be sure that existing funds (e.g. Cleaner Greener Safer) and new funds are spent on projects that will maximise climate and equity benefits. It’s important to see these costs against the future costs of not acting swiftly and ambitiously now.

In conclusion, while in many respects the CAP and baseline has significantly improved, we fear that Southwark still lacks clear decarbonisation targets and measurable indicators to quantitatively assess our progress to our borough-wide goal. We call for Southwark to remedy this as a matter of urgency to strengthen the Southwark CAP, recognising that annual updates are insufficient given the rapid pace of climate breakdown currently affecting residents. Southwark Council has an opportunity here to lead by example, and take proactive, ambitious steps to address the climate emergency rather than basic compliance.

These are our initial views. We look forward to continuing engagement with the Council on these important issues. The 25 community groups making up the Southwark Climate Justice Coalition plan to meet during August. We will use that opportunity for a deeper look at the CAP and will follow up with further written comments after that meeting.

Yours sincerely,

Extinction Rebellion Southwark’s Lobbying Group