

**HEART
OF LONDON
BUSINESS
ALLIANCE**

**NET ZERO
CARBON STRATEGY
& ACTION PLAN**

A large circular graphic with a green-to-blue gradient, containing the text "NET ZERO" in large, bold, sans-serif letters. The background is a split image of a city skyline and a cloudy sky.

**NET
ZERO**

CONTENTS
CHAPTERS

1

FOREWORD
PAGE 3

2

EXECUTIVE
SUMMARY
PAGE 6

3

ABOUT
HOLBA
PAGE 8

4

RATIONALE
PAGE 10

5

POLICY
CONTEXT
PAGE 18

6

RESEARCH
PAGE 20

7

FOCUS
AREAS
PAGE 23

8

ACTION
PLAN
PAGE 29

9

OBSTACLES,
ENABLING
FACTORS &
OPPORTUNITIES
PAGE 35

10

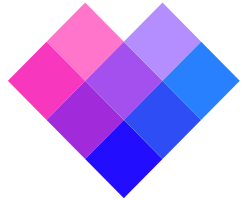
GOVERNANCE
PAGE 40

Appendix 1:
Baseline data
Appendix 2:
Acknowledgements
Authors

CHAPTER 1 FOREWORD



Foreword



**HEART
OF LONDON
BUSINESS
ALLIANCE**

2040

Westminster has a target to reach net zero by 2040

Climate change is the most pervasive threat the world has ever faced and commands cities to play their part in tackling it.

Westminster has a target to reach net zero by 2040. Energy transition and net zero policy are key missions for the Government, second only to economic growth. Spearheaded by the Council, Westminster's Climate Emergency Action Plan sets out comprehensive actions for achieving this target. The West End has some of the highest carbon emissions and worst air pollution in London. As such, urgent and combined action is needed from HOLBA's 600 members.

People are increasingly aware that they are living in a climate crisis. This is playing a leading role in their consumption and spending choices and, consequently, the strategic and financial decisions companies make.

Climate change mitigation is set to become only more important in decision-making and therefore has the potential to drive differentiation. And, whilst some of our members have committed to more sustainable choices, with this strategy we are enabling all of our members to adopt their own net zero carbon pathways.

HOLBA is well-placed to evaluate the West End's environmental impact and to advance its response; to help our members and wider community of stakeholders take a collective approach to addressing the threat of climate change whilst recognising the opportunities it presents to improve their trading environment.

HOLBA works with and for our members. This strategy has been developed with their shared interests at its core.

Ros Morgan, Chief Executive

OVERVIEW

Heart of London Business Alliance (HOLBA) is a membership organisation representing over 500 businesses and property owners in Leicester Square, St Martin's, Piccadilly and St James's areas of the West End. The Heart of London area attracts over 200 million visitors a year, is home to almost 112,000 jobs and its economy has an annual gross value added of £10 billion.

Climate change and related environmental challenges have a direct impact on the performance of the West End economy and how people experience the Heart of London area. We are therefore committed to working in partnership to migrate the West End to a **net zero carbon economy** and supporting our member businesses' transition to even more sustainable ways of operating.

+19,000

IT IS ESTIMATED THAT 19,000 NEW JOBS A YEAR WILL BE CREATED TO RETROFIT THE CAPITAL'S OLDER BUILDINGS

The **transition to a net zero carbon economy also represents a significant opportunity** to Westminster businesses, workers and residents. It is estimated that 19,000 new jobs a year from 2021 to 2050 will be created in London alone to retrofit the Capital's older buildings.

We will support the creation of new jobs and reskilling local people to deliver the changes to buildings, business operations and transport. We want to see a new **Zero Carbon Centre of Excellence** for the West End which will upskill local people and advise businesses.

This Strategy and Action Plan sets out how we will work with partners to deliver a Net Zero Carbon West End. This is based on our research into how HOLBA can accelerate the delivery of carbon reduction measures.

The focus of the Strategy and Action Plan is on four priority areas, where business activity contributes most to reducing carbon emissions: Buildings, Transport, Waste and Supply chain.

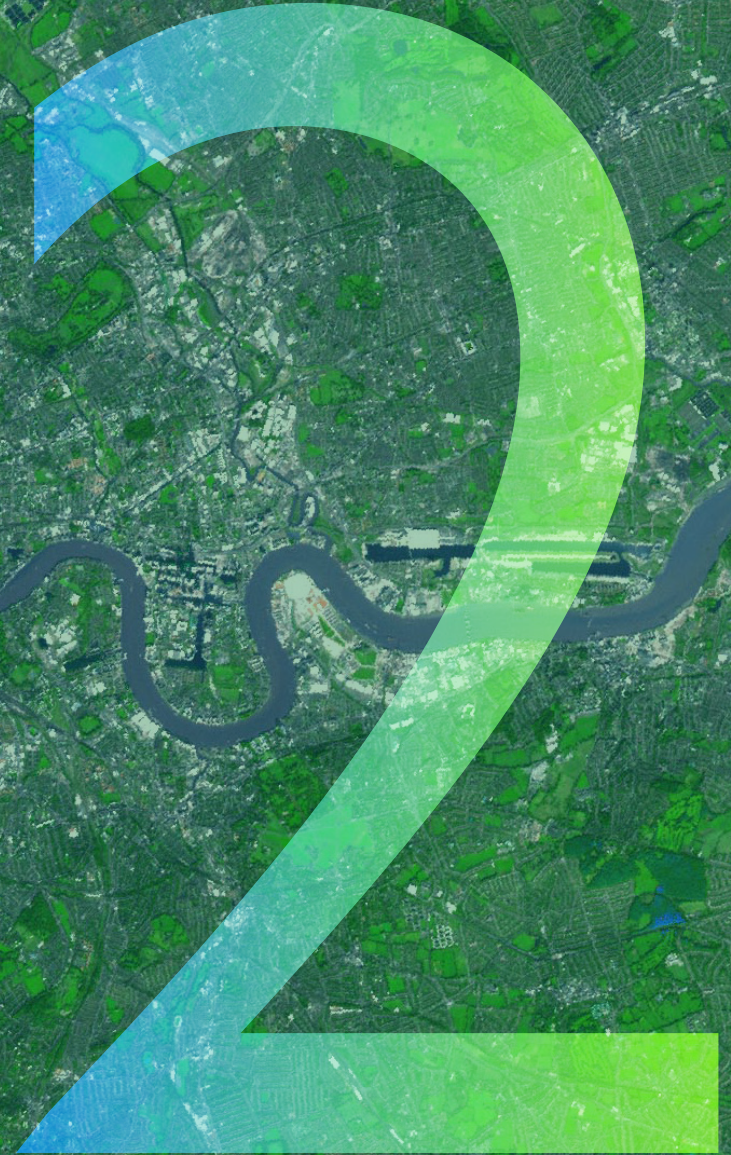


WE WOULD LIKE TO SEE A NEW ZERO CARBON CENTRE OF EXCELLENCE ESTABLISHED

CO₂

WE WILL WORK WITH PARTNERS TO DELIVER A NET ZERO CARBON WEST END

CHAPTER 2 EXECUTIVE SUMMARY



EXECUTIVE SUMMARY

KEY ACTIONS

We have committed to championing and delivering in partnership over 30 actions, with nine key actions to maximise impact:

9 KEY ACTIONS

30 MITIGATION ACTIONS

1 Encourage HOLBA businesses to sign up for the **Westminster Sustainable City Charter**



2 Accelerate the **retrofit of old buildings** with a dedicated, intensive delivery programme



3 Encourage West End businesses to buy their power from a renewable energy supplier



4 Deliver a network of walking, cycling and public realm projects for the West End



5 Support the Zero Emissions Group to **reduce commercial vehicles in the West End by 80%**



6 Develop a Zero Carbon Centre of Excellence to upskill the local workforce



7 Address Scope 3 supply chain emissions, with a programme of guidance and **accredited suppliers of goods, materials and services to the West End**



8 Promote simple, accessible and trusted **guidance and training for key business sectors**



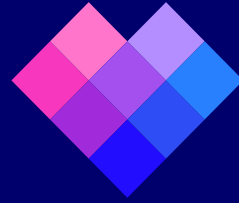
9 Advocate for **policy changes and clarity on net zero regulations** at the national, regional and local level to support businesses, in particular **tax incentives for retrofitting buildings**



CHAPTER 3 ABOUT HOLBA



ABOUT HEART OF LONDON BUSINESS ALLIANCE



HEART OF LONDON BUSINESS ALLIANCE

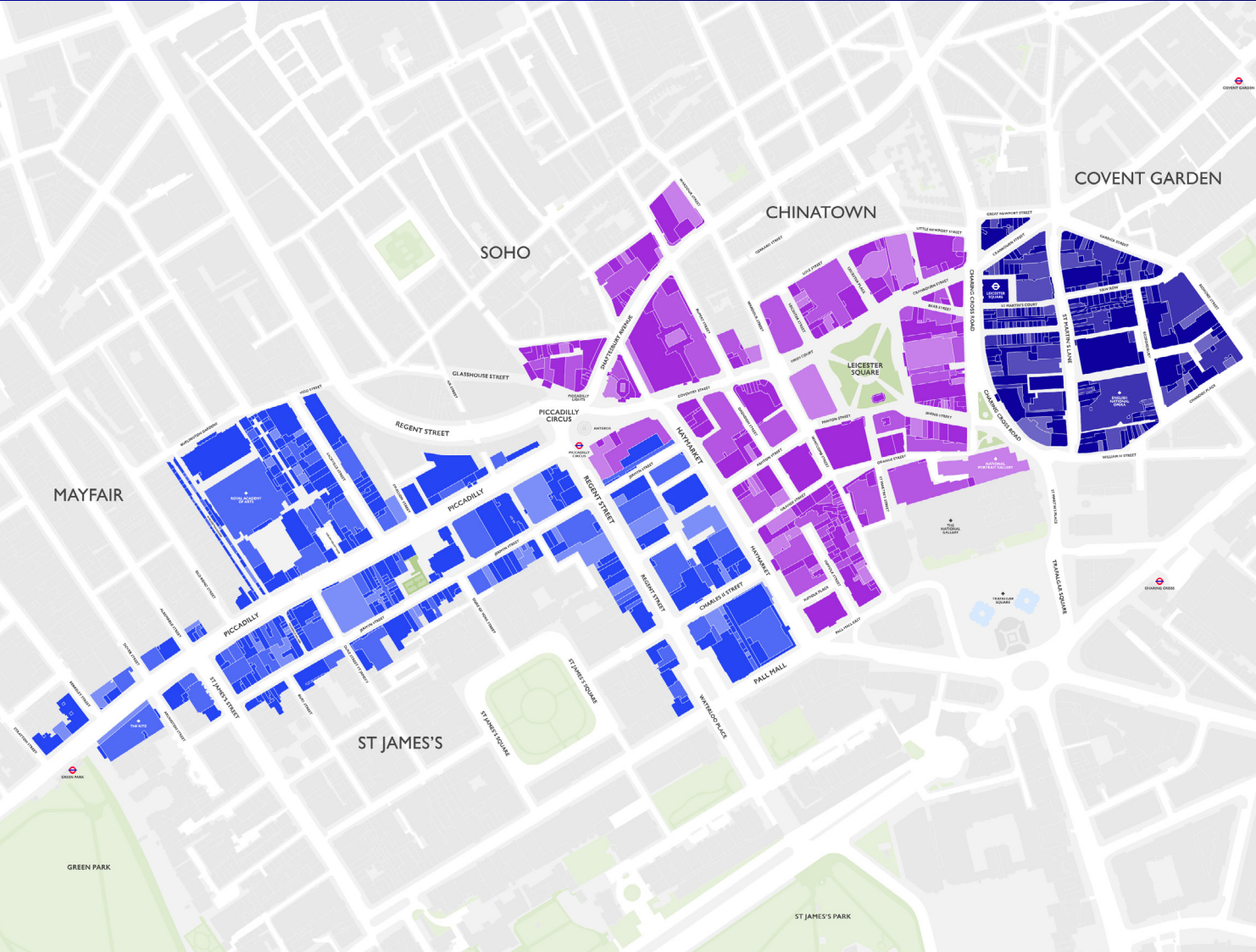
The Heart of London area attracts more than 200 million visitors a year, is home to almost 112,000 jobs and the economy has an annual gross value added of £10 billion.

Heart of London Business Alliance (HOLBA) is a membership organisation representing over 500 businesses and property owners across the Piccadilly, St James's, Haymarket, Piccadilly Circus, Leicester Square and St Martin's areas. Our purpose is to protect and promote the commercial and cultural wellbeing of London's West End on behalf of our members, securing its status as the best city in the world in which to live, visit, work, trade and invest.

Protecting the well-being of the area and its people includes ensuring that it has a sustainable future and that it is **contributing to climate change mitigation, adaptation and resilience.**

Climate change and related environmental challenges have a direct impact on how people experience the Heart of London area. We are therefore committed to working in partnership to migrate the West End to a **net zero carbon economy** and supporting our businesses in their transition to even more sustainable ways of operating.

This Strategy and Action Plan sets out how we will do this.



CHAPTER 4 RATIONALE



RATIONALE



CONTEXT

We can already feel the effects of climate change. We have experienced record-breaking heat waves in the summers and unprecedented flooding from heavy rains all year round.

Research indicates that, to prevent further dangerous and irreversible effects of climate change, the climate emergency must be met with the following:

MITIGATION →

Reducing carbon emissions

ADAPTATION →

Changing systems to adjust to the effects of climate change

RESILIENCE →

Finding ways to cope with extreme climate events

RATIONALE



BUSINESS CASE



West End businesses can benefit from decarbonisation of the wider economy in a number of ways, including attracting additional visitors and spending, attracting talented staff, reducing operating costs, increasing footfall and revenue and optimising their capital structure.

A recent report by Deloitte highlights that companies which have made net zero commitments show consistently higher resilience to the climate emergency and can profit from the opportunities from the transition to net zero carbon economies.

Research by McKinsey states that supplying the goods and services to enable the global net zero transition could be worth **£1 trillion to UK businesses by 2030.**

+£1 Trillion

RATIONALE



SUSTAINING JOBS



Attracting staff is an additional incentive for West End businesses to invest in the net zero transformation. Net zero carbon businesses are more likely to attract and retain high-calibre staff because of the ethical values of their employer. This has a **positive influence on productivity**, as the CBI reports that net zero businesses are 1.7 times more productive in terms of GVA per employee, compared to the UK's economy national average.

To retrofit London's traditional buildings, 19,000 new jobs a year (2021 to 2050) will be created, according to Grosvenor.

They also estimate that 840,000 jobs linked to sectors ranging from renewable energy to waste management have already been created by the drive to achieve net zero.

A report by WPI indicates that green jobs in London will increase from 235,500 in 2020 to 505,000 by 2030.

+ 269,000

RESEARCH INDICATES THAT GREEN JOBS IN LONDON WILL INCREASE BY OVER 269,000 BY 2030

RATIONALE



ATTRACTING CONSUMERS



Adopting net zero carbon pathways can attract consumers to West End businesses. Studies by Deloitte show that there has been a sharp increase in consumers adopting sustainable practices, with **55% of consumers choosing brands with sustainable values**. This has led to consumers increasingly expecting companies to make ethical decisions, with green businesses attracting new customers, according to The Carbon Trust. **66% of UK consumers are prepared to pay more for sustainable products and services**. Businesses that have a sustainability commitment also have higher customer retention rates than competitors in the same sector.

Research indicates that air pollution can negatively affect consumer decision-making and can lead to decreased footfall in areas of higher air pollution.

West End businesses would therefore benefit from localised air quality improvements resulting from the delivery of this Net Zero Carbon Strategy and Action Plan, as well as supporting wider global warming reduction benefits.

55% OF CONSUMERS ARE CHOOSING BRANDS WITH SUSTAINABLE VALUES

55%

66% OF UK CONSUMERS ARE PREPARED TO PAY MORE FOR SUSTAINABLE PRODUCTS AND SERVICES

66%

RATIONALE



INVESTMENT AND THE BUSINESS ROLE



INWARD INVESTMENT

Adopting net zero carbon pathways can also attract more investors to West End businesses. Research indicates that investors are more likely to select companies with a good sustainability rating, resulting in **15% more investment**. The Government's Green Prosperity Fund will promote growth and clean energy and lever in private investment to transition the economy. Carbon credit funds are seeking verifiable investments that can deliver carbon reduction. Investment funds, including HOLBA members, are prioritising decarbonisation investments. For example, Aviva is aiming to achieve net zero carbon by 2040 and is committed to investing £2.5 billion in low-carbon and renewable energy infrastructure.

THE ROLE OF BUSINESS

Businesses must play a key role in accelerating the transition to a Net Zero Carbon West End. The transition to a net zero future is creating new industries, jobs and new growth opportunities for business. We want the West End economy to contribute to – and benefit from – the net zero carbon transition. Action to reduce carbon can deliver longer-term cost savings, future-proof business operations and contribute to sustaining the West End's economic vitality.

+15% Investment

RATIONALE



PLAYING OUR PART



To ensure that the West End continues to live up to its world-class status, we must create a sustainable and inclusive environment that is clean, safe and well-managed.

We will do this by focusing on activities where we can have the biggest and most lasting impact; bringing partners together to accelerate delivery of net zero carbon actions; and making it easier for businesses to deliver impactful changes to reduce carbon emissions.

This Strategy and Action Plan aims to provide support for all West End business, regardless of where they are currently on their journey to net zero carbon.

We will advocate for investment and provide help to decarbonise business operations, adopt new technologies and retrofit buildings. We will be a source of guidance and support, and we will convene partnerships to accelerate delivery.

IMPACT

WE WILL FOCUS ON ACTIVITIES THAT HAVE THE BIGGEST AND LASTING IMPACT

RATIONALE



DELIVERING IN PARTNERSHIP



**SUSTAINABLE
CITY
CHARTER**

**ZERO
CARBON
2025** **WPA** **City of Westminster**

We cannot do this alone. This Strategy and Action Plan is aligned with the Westminster Sustainable City Charter, the Mayor of London's net zero carbon policies and the work of other business organisations to deliver a Net Zero Carbon West End.

The strategy takes inspiration from work by other organisations to decarbonise buildings and operations and refers to best-practice guidance from the public and private sectors.



We are committed to working in partnership to migrate the West End to a net zero carbon economy and supporting our businesses in their transition to even more sustainable ways of operating.

CHAPTER 5

POLICY

CONTEXT



SCOPE 1/2/3

GREENHOUSE GAS PROTOCOL EMISSIONS SCOPES

This strategy sets out opportunities for businesses to collaborate in mitigating climate impacts, including reducing their Scope 1, 2, and 3 emissions, as defined by the International Green House Gas (GHG) Protocol Standard:

- ◆ Scope 1 – Direct emissions from owned or controlled sources (for example, emissions from combustion in owned or controlled boilers and vehicles)
- ◆ Scope 2 – Indirect emissions from the generation of purchased energy (for example, emissions from consumption of purchased electricity, heat and cooling)
- ◆ Scope 3 – All other indirect emissions in the value chain, including procured materials (for example, emissions from business travel, waste disposal or purchased materials)

POLICY AT DIFFERENT LEVELS OF GOVERNMENT

The table below summarises the key strategies, targets and actions at every level of government, from international to national to local.

Body	Targets
International	Conference of Parties (COP) – 1.5°C maximum increase in temperature target.
National	Government is the first major economy to declare a target. The UK has committed to reducing its economy-wide greenhouse gas emissions by at least 68% by 2030 and to get to net zero by 2050. By 2030, the Government want a zero carbon electricity system, ban the sale of new internal combustion vehicles, and ensure properties meet minimum energy standards.
Regional	The Mayor of London has set a net zero carbon target date of 2030.
Local - Westminster	City of Westminster has declared a Climate Emergency with a net zero target of 2040 and in 2023 facilitated a Citizens' Climate Assembly to make new recommendations.
Local - West End	Westminster Property Association (WPA) calls on Westminster's property sector to decarbonise the City's built environment by 2040.

CHAPTER 6 RESEARCH



RESEARCH



METHODOLOGY

The Strategy and Action Plan was informed by comprehensive research and engagement



DESKTOP RESEARCH

- A review of the net zero carbon strategies of a sample of HOLBA members and every board-member organisation
- Proposed actions were developed and road tested with the interviewees to ensure they are deliverable
- A review of industry best practice

INTERVIEWS

- All HOLBA members were invited to participate in interviews on their businesses' net zero carbon pathways
- Interviewees represented all key sectors in the West End, to understand common barriers and enabling factors to reaching net zero, and actions HOLBA can undertake to support members
- We asked for examples of best practice in our four focus areas – buildings and energy, transport, waste, and products and materials
- Interviewees included industry experts sector leaders, government agencies and relevant membership bodies, including the WPA and Business London

ANALYSIS, DEVELOPMENT & VALIDATION

- Evolving recommendations were explored with the interviewees to ensure that the recommendations aligned to their experiences
- The Strategy and Action Plan was peer-reviewed by Dr Rosa Schiano-Phan of the University of Westminster to ensure its robustness and credibility

RESEARCH



FINDINGS



- Some businesses are very advanced in the decarbonisation of areas that they control (particularly large companies with mandated reporting such as environmental disclosures)
- Many businesses are not making progress (particularly smaller companies with fewer resources)
- Scope 3 emissions are the most challenging for businesses to address
- There is a need for clearer policy guidance and standards
- There are knowledge gaps and potentially a skills shortage of people who can deliver carbon reduction measures
- Historic buildings are challenging to retrofit
- There is a desire for more collaboration between businesses and the public sector on large-scale projects such as district heating
- Tax incentives and funding are needed to accelerate decarbonisation

CHAPTER 7

FOCUS AREAS



FOCUS AREAS

The research identified four focus areas where we can contribute most to decarbonisation:

Buildings



Transport



Supply Chain



Waste



FOCUS AREAS BUILDINGS



WITHOUT ACTION TO UPGRADE PERFORMANCE TO MINIMUM ENERGY STANDARD TO EPC B OR ABOVE, 69% OF OFFICE BUILDINGS WITHIN THE WEST END WILL BE UNLETTABLE BY 2030

69%

1 in 4

ONLY ONE IN FOUR BUSINESSES HAVE BEGUN INTRODUCING MEASURES TO REDUCE THEIR COMMERCIAL BUILDINGS' CARBON EMISSIONS

Buildings contribute to climate change over their whole lifecycle, from construction, operation, maintenance to demolition or repurposing. Westminster's buildings (both residential and non-residential) contribute 83% of the borough's carbon-equivalent emissions. How buildings are heated and lit is also vital to decarbonising the West End economy. The government's "Powering Up Britain" strategy commits to accelerating renewable power and energy-efficiency measures.

In the HOLBA area, like Westminster as a whole, heating and electricity for commercial buildings are the main source of carbon emissions, as shown in the chart (left). At the national level, commercial buildings account for just 18% of total emissions, whereas in Westminster this rises to 64%. At the HOLBA level, it rises further still to 76% of total CO₂ emissions.

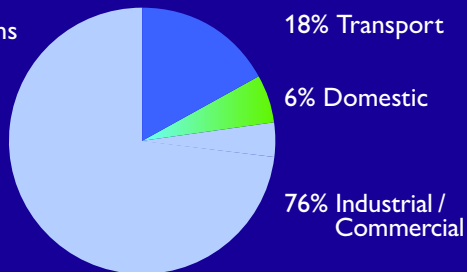
National research indicates that only one in four businesses have begun introducing measures to reduce their commercial buildings' carbon emissions.

Research also shows that only 1% of new commercial buildings achieve BREEAM Outstanding, which is the highest level of environmental performance. To achieve net zero carbon in the West End, new buildings will need to achieve the highest level of BREEAM and all buildings will need to work towards achieving high levels of 'BREEAM in-use', which is a framework to improve the environmental performance of buildings' operation.

80% of buildings that will be in use in 2050 are already built, which indicates the importance of retrofitting.

Without action to upgrade performance, the national target to increase the minimum energy standard to EPC B or above, 69% of office buildings within the West End risk being unlettable by 2030.

HOLBA
CO₂ Emissions



FOCUS AREAS TRANSPORT



50%

TAXIS, PRIVATE HIRE AND PRIVATE CAR USE ACCOUNT FOR ALMOST 50% OF EMISSIONS IN THE HOLBA AREA



Addressing carbon dioxide emissions generated by road transport will be crucial to meeting net zero targets because it is the second-largest contributor to the HOLBA area's emissions (18% of the total).

Taxis, private hire and private car use account for almost 50% of transport emissions in the HOLBA area, showing the importance of moving to electric vehicles and reducing car use.

Despite the recent growth in cycle routes and cycling in London, the HOLBA area currently has no cycle routes at all.

The most recent Travel in London report indicates that freight vehicles are more polluting per mile than other vehicle types, and that emissions from freight vehicles have not been falling at the same rate as for other vehicle types. Addressing freight and servicing vehicles therefore forms an important part of this strategy.



CO₂

FOCUS AREAS SUPPLY CHAIN



WHAT ARE SCOPE 3 EMISSIONS?

All other indirect emissions in the value chain, including procured materials (for example, emissions from business travel, waste disposal or purchased materials)

- ◆ PURCHASED GOODS AND SERVICES
- ◆ BUSINESS TRAVEL
- ◆ EMPLOYEE COMMUTING
- ◆ WASTE DISPOSAL
- ◆ USE OF SOLD PRODUCTS
- ◆ TRANSPORTATION & DISTRIBUTION (UPSTREAM AND DOWNSTREAM)
- ◆ INVESTMENTS
- ◆ LEASED ASSETS AND FRANCHISES

The choice of materials in the production and supply of products and services to the West End, and where they are sourced from, all impact carbon emissions.

Scope 3 emissions for the West End are more challenging to quantify at the district level and difficult to address at the business level, although many businesses are beginning the process of doing so.

For HOLBA area businesses, how energy, goods and materials are procured and transported can make a difference to the area's emissions across all three scope types.



FOCUS AREAS WASTE

500,000 T

WASTE IN LONDON CONTRIBUTES ALMOST 500,000 TONNES OF CARBON-EQUIVALENT EMISSIONS



Westminster Council services collect approximately 180,000 tonnes of waste a year, of which 25% is recycled. This does not include the commercial waste collected by private companies.

Waste from business activities also makes up a greater proportion of total waste compared with other boroughs, with food waste making the single largest contribution to emissions.

Waste in London contributes almost **500,000 tonnes of carbon-equivalent emissions**.

Although representing only 1.7% of all of London's carbon-equivalent emissions, businesses' new responsibilities to reduce waste under the Environment Act (2021) can contribute to reducing emissions.



CHAPTER 8

ACTION PLAN



ACTION PLAN KEY ACTIONS

The research informed the development of nine strategic actions to accelerate decarbonisation across the district, underpinned by a detailed action plan consisting of over 30 interventions, grouped into our four focus areas.

Our nine actions to accelerate decarbonisation are set out as follows:

9 KEY ACTIONS

30 INTERVENTIONS

1 Encourage HOLBA businesses to sign up for the **Westminster Sustainable City Charter**



2 Accelerate the **retrofit of old buildings** with a dedicated, intensive delivery programme



3 Encourage West End businesses to buy their power from a renewable energy supplier



4 Deliver a network of walking, cycling and public realm projects for the West End



5 Support the Zero Emissions Group to **reduce commercial vehicles in the West End by 80%**



6 Develop a Zero Carbon Centre of Excellence to upskill the local workforce



7 Address Scope 3 supply chain emissions, with a programme of guidance and **accredited suppliers of goods, materials and services to the West End**



8 Promote simple, accessible and trusted **guidance and training for key business sectors**



9 Advocate for **policy changes and clarity on net zero regulations** at the national, regional and local level to support businesses, in particular **tax incentives for retrofitting buildings**



ACTION PLAN BUILDINGS



To help businesses reduce their emissions related to buildings and energy, we will:

- Promote and advocate **retrofitting**, where appropriate, with sympathetic refurbishment
- Encourage HOLBA businesses to put forward pilot projects for the **Westminster Buildings Retrofit Taskforce**, to test new approaches to retrofitting challenging buildings
- Promote **'BREEAM in Use'** so that buildings operate sustainably
- Promote **rainwater collection**, retention and recirculation from 'blue roofs'
- Support **research into a district heating network** – Westminster's densely-built environment makes the city a prime location for local, decentralised, low carbon energy networks
- Lobby Government to mobilise funding and tax incentives for the **decarbonisation of buildings** and **expansion of local heat networks**, enabling a transition from natural gas to low-carbon, electrified heating
- Promote **power purchase agreements** to create investment in renewable energy supply
- Promote good practice in **Green Leases**, supporting property owners and tenants in reducing emissions from buildings
- Promote opportunities to achieve a **biodiversity net gain** to new developments, through intensively-greened public realm schemes and new spaces, with health benefits for citizens and reduction of the "urban heat island" effect
- Promote use of the **UK Net Zero Carbon Buildings Standard**



ENO

English National Opera (ENO) launched the Everything Now Off (ENO) campaign to cut emissions by turning off unnecessary lights. This involved changing some long-held views ("But this is how we've always done it") and a change in mindset for employees to see it as part of their job. By getting all members of the organisation to feel invested and involved, ENO was able to increase employee awareness and encourage them to reduce energy use.

ACTION PLAN TRANSPORT



To help businesses reduce their transport-related emissions, we will:

- Work with partners to secure a **zero-emission transport zone** for the West End
- Support **new infrastructure** in the West End to ensure that the Mayor of London's goal for 80% of all Londoners' trips to be made by walking, cycling or public transport is achieved
- Lobby the Government to invest in London's transport infrastructure to **make walking and cycling more attractive** and **public transport more affordable**
- With partners, develop **Healthy Streets** and routes to encourage walking, cycling and public transport in the West End
- Promote **electric vehicle charging infrastructure** as part of new developments, in car parks and at appropriate on-street locations
- Promote the **expansion of zero-emission deliveries** and servicing



ACTION PLAN SUPPLY CHAIN



Fortnum & Mason is working on decarbonising its supply chain by using local artisanal suppliers where possible, which in turn reduces their transport-related emissions. Many of these suppliers are small businesses that may not understand their Scope 3 emissions or have the resources to decarbonise their supply chains. Fortnum & Mason delivered workshops for their suppliers with content on what Scope 3 emissions are and how to measure them, making clear the importance of the suppliers' role in Fortnum & Mason's decarbonisation plan. They also held workshops for employees and board members to increase understanding of the challenges and solutions.

**FORTNUM
& MASON**
EST 1707

To help businesses decarbonise their supply chains, we will:

- Signpost businesses to tools to help them begin to **baseline their Scope 3 emissions**
- Advocate with government to **set clear benchmarks and targets** to support businesses to tackle Scope 3 emissions
- **Share best practice** from retail, leisure and food and beverage businesses that are starting to tackle Scope 3 emissions
- Promote the work of the estates and property owners tackling **decarbonisation of their construction supply chains**
- **Provide green supplier guides** of tried and tested sustainable suppliers to HOLBA members
- **Promote the use of local businesses** to shorten supply chains and reduce transport emissions



ACTION PLAN WASTE



Westminster City Council's commercial waste collection service, provided by Veolia, is decarbonising the entire fleet.

It is HOLBA's preferred supplier for businesses and HOLBA members receive a discount of up to 20% on services. This helps deliver increased recycling figures (currently around 40%, which is much higher than for other waste collection companies and areas) and lower vehicle emissions in the area. Veolia offers HOLBA members free workplace waste audits and training to identify how to maximise recycling.

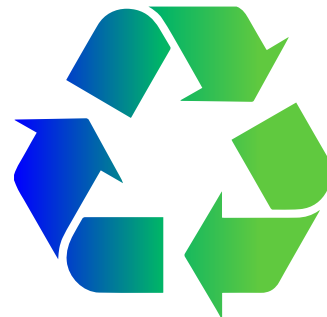
To help businesses reduce carbon emissions arising from waste, we will:

- Create a 'Don't Skip, Donate' centre to **re-use PPE and building materials** locally for DIY and smaller projects
- Expand and promote the **preferred supplier recycling and waste collection** scheme
- Help businesses to develop **waste reduction plans** for their buildings, including tenants
- Promote **workplace recycling information and training** — Veolia to run free waste audits and training workshops for businesses

We will also support business in preparing for their new responsibilities under the **Environment Act (2021)**, specifically those relating to **reducing waste and increasing recycling**. These include:

- New duties on businesses and their supply chains to segregate and recycle food waste
- Producers to pay the full net costs of managing their products at end of life
- Charges for single-use plastic and efficiency standards for non-energy related products
- Standardisation of waste and recycling across local authorities
- Deposit return schemes

HOLBA will work with Westminster Council to reduce the volume of waste and drive recycling compliance to achieve the national target of **65% of waste being recycled**



CHAPTER 9
OBSTACLES,
ENABLING
FACTORS &
OPPORTUNITIES



OBSTACLES, ENABLING FACTORS & OPPORTUNITIES

HOLBA member interviewees cited the following factors consistently as the obstacles and enabling factors for cutting their carbon emissions, and the opportunities for HOLBA to help:

OBSTACLES

- Scope 3 emissions are the most difficult and complex to address
- Inconsistency in planning requirements and standards across boroughs
- Slower than desired progress on the public sector delivering committed place and sustainable transport improvement schemes
- Lacking baseline and performance data – gathering it is challenging
- Resource-intensive to go for net zero (particularly for SMEs) (e.g. availability and pricing of renewable energy guarantees of origins (REGO) energy not cost efficient to smaller businesses due to size of demand)
- Scalability of carbon-reduction measures (Many small pilot projects – need scale)
- Communications issues – getting to the right decision-maker; encouraging customers to help with actions
- Consistent standards required: many ways to classify emissions and off-sets
- Multiple and numerous roundtables and networks, compared with insufficient action focused support, funding and incentives
- No one-size-fits-all solution – businesses facing different issues (embodied carbon vs operational; how to balance and manage heritage considerations; occupier engagement) Some sectors prioritise different emissions: i.e. fashion (the emissions from supply chain have primacy over emissions from premises; other concerns take priority i.e. modern slavery)
- Internal resistance to changing how things are done “we’ve always done it this way”

OBSTACLES, ENABLING FACTORS & OPPORTUNITIES

HOLBA member interviewees cited the following factors consistently as the obstacles and enabling factors for cutting their carbon emissions, and the opportunities for HOLBA to help:

ENABLING FACTORS

Business-led:

- Net zero carbon is high on the agenda for investors
- Lead from the top – have a board-level champion on sustainability and net zero
- Appoint a sustainability lead for the organisation
- Ensure staff are engaged and embed sustainability in culture and staff behaviours
- Provide enough resources for these initiatives
- Share data
- Set key targets and standards
- Encourage good practice: e.g. clear-desk policy encourages everyone to power down

External:

- Eliminate the jargon – and the confusion over where to have maximum impact
- Provide clear methodology for moving to net zero that applies to all sectors (well-developed for the property sector)
- Make initiatives easy
- Reinforce to businesses that they have critical role to play
- Encourage positive peer pressure amongst businesses
- Enact government laws and regulations that require change – not everything will be done voluntarily

OBSTACLES, ENABLING FACTORS & OPPORTUNITIES

HOLBA member interviewees cited the following factors consistently as the obstacles and enabling factors for cutting their carbon emissions, and the opportunities for HOLBA to help:

OPPORTUNITIES FOR HOLBA TO HELP

- Use HOLBA's convening strength to bring organisations together to act — identify what material change is possible within the district and help businesses partner together. Businesses desire sharing best practice with similar businesses and industry-specific experts
- Be a forum for training and sharing of best practice
- Signpost businesses to steps they can take / highlight inspiring businesses with trailblazers
- Influence specific sectors on specific actions:
 - ◆ retail businesses on what is reasonable for display lighting
 - ◆ restaurants: promote the additional benefits of becoming more sustainable (moving away from gas to electric cooking — fewer burns, better air quality)
- Create a library for information to increase knowledge and glossary of accreditation and kitemark schemes
- Lobby for specific programmes: i.e. walking, cycling and public realm improvements
- Serve as a conduit for Westminster City Council initiatives
- Engage with landlords
- Delivery consolidation / waste consolidation: businesses could share info. HOLBA could be the conduit for sharing that information and best practice

OBSTACLES, ENABLING FACTORS & OPPORTUNITIES

HOLBA member interviewees cited the following factors consistently as the obstacles and enabling factors for cutting their carbon emissions, and the opportunities for HOLBA to help:

OPPORTUNITIES FOR HOLBA TO HELP

- Be a bridge for key messages:
 - ◆ Dispel the misconceptions: cost (it is too expensive to go for net zero); property owner vs occupier (who pays? who benefits?); smaller property owners — encourage more collaboration between landlords and occupiers so all costs don't go to occupier
 - ◆ Emphasise that Net Zero is a journey — join the journey where you are at — Net Zero Carbon Action Plan can emphasise points of entry
 - ◆ Highlight the opportunity to sell co-benefits with net zero: encourage use of stairs — also health co-benefit; natural lighting — good for well-being — makes the ROI palatable
 - ◆ Don't just focus on net zero — also think about recovery of nature / biodiversity (sustainability not just net zero) and social aspects (costs / skills) — how to make everything accessible to all? Great places for the planet and people
- Develop the 'Social' element in ESG with ways to use carbon offsetting to improve lives of those living and working within Westminster
- Influence specific sectors on specific actions: retail businesses on what is reasonable for display lighting
- Provide specific net zero help:
 - ◆ Share sustainable supplier lists: who is effective, who is approved
 - ◆ Provide information on access to funding Support specific initiatives (e.g. Food Digester – National Gallery)
 - ◆ Help simplify net zero for business providing a focus on what is relevant locally rather than industrywide (this area can be technical with definitions evolving – HOLBA can help with collaboration and clarity)

CHAPTER 10 GOVERNANCE

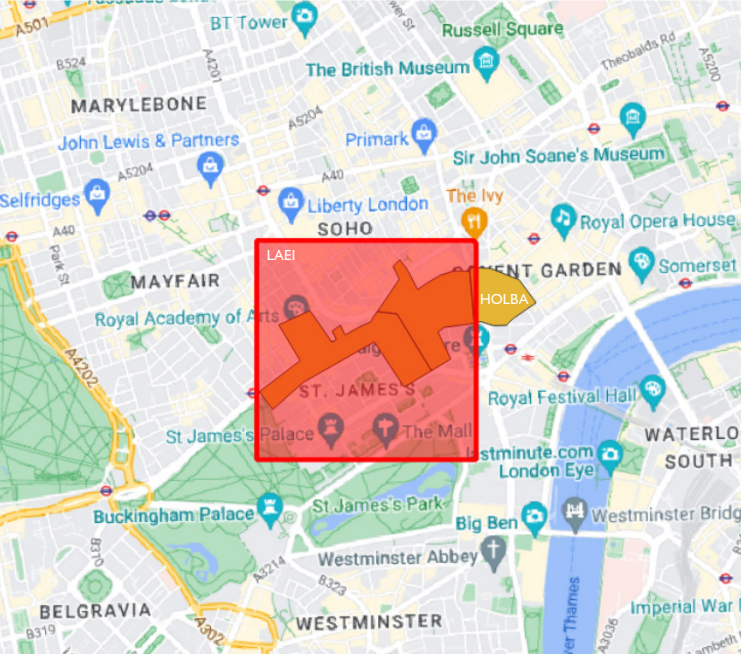
The Strategy and Action Plan will be overseen by a partnership advisory board.

A steering group will coordinate delivery of the actions with existing partnership structures such as the Zero Emission Group, and working closely with Westminster City Council, property owners and adjacent business improvement districts.

The Strategic Action Plan will be followed up with implementation and delivery Plans, with clear responsibility, budgets and timescales.



APPENDIX 1: BASELINE DATA



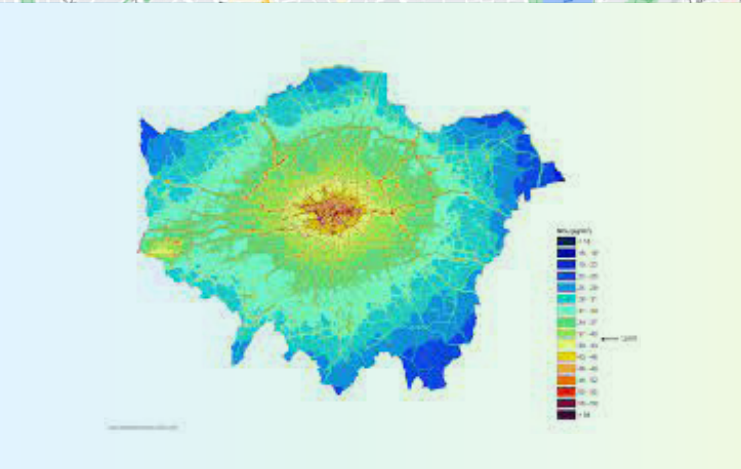
The challenge with establishing an emissions baseline for a BID area such as HOLBA's is that there are no readily available data sources for emissions at the BID geographic level.

In this strategy, the London Atmospheric Emissions Inventory (LAEI) has been used as the best proxy for the HOLBA geographic level. The image left superimposes the quadrant of data from the LAEI on the London and HOLBA maps showing how they correspond.

The LAEI focuses on air pollution (NO_x, PM10 and PM2.5) and includes CO₂ emissions for the smaller geographic level. The most recent LAEI uses data from 2019, which updated at the end of 2023 with 2020 data.

Better sources of data for monitoring the strategy may become available. Westminster City Council is undertaking a Local Area Energy Plan (LAEP) (with consultants) to inform how the City can achieve its 2040 net zero target. WCC is developing the plan with the aim of advising stakeholders from across Westminster on the most cost-effective ways of decarbonising energy use. The first part of the LAEP is mapping existing energy use across the City of Westminster. The data collected for the plan will be for each property type and will include usage, type, insulation, age, floor area, display energy certificate, etc (details listed below).

This data should be available at a postcode level, so the postcodes in the HOLBA area can be monitored. While this will still not be an exact match for the HOLBA area, it will be closer geographically and data will be more recent (with a year) which will make it easier to monitor progress.



APPENDIX 2: LIST OF ORGANISATIONS CONSULTED

We wish to thank all those who participated in our research, particularly the organisations listed here.

We appreciate your time, energy and enthusiasm in sharing your thoughts and ideas.

HOLBA MEMBERS

BAFTA
Capital Arches Group
Criterion Capital
The Crown Estate
Edwardian Hotels
English National Opera
Fortnum & Mason
Gascoyne
Great Portland Estate
Landsec
National Gallery
Old Park Lane Management
Shaftesbury Capital

OTHER ORGANISATIONS

Albert
Better Buildings Partnership
BusinessLDN
Greater London Authority / Mayor of London
New West End Company
Westminster Property Association
Westminster City Council
University of Westminster
Veolia



AUTHORS



This report has been prepared by Placemaking London.

Any information, data or opinion contained herein has been based on information obtained by Placemaking London from sources believed to be reliable.

Placemaking London will not have or accept any liability, responsibility or obligation in connection with, or based on, in whole or in part, the information, opinions, projections, forecasts, forward-looking statements, errors or omissions contained in this report. Nothing contained in this report shall be relied on in any manner as legal, tax, investment, accounting or other advice.

Except where otherwise indicated herein, the information provided in this report is based on matters as they exist as of the date of the preparation of this report and not as of any future date.

© 2024 Placemaking London

Placemaking London

www.placemaking.london



**HEART
OF LONDON
BUSINESS
ALLIANCE**

Heart of London Business Alliance
80–81 St. Martin's Lane
London WC2N 4AA

holba.london

