

## **Climate Emergency Camden's response to LB Camden's draft Climate Action Plan 29.02.20**

CEC welcomes the draft plan as presented in the on-line consultation and supports these steps in formulating a plan of action for LB Camden to take forward in response to the Climate and Ecological Emergency. We look forward to seeing these being rapidly developed and implemented.

In this document we first make some comments about the overall strategy, and then comment on the detailed actions as set out in the document. Nb. we use the terminology of the Greenhouse Gas Protocol, ie Scope 1 and 2 (direct, territorial) and Scope 3 (consumption, indirect). [Greenhouse Gas Protocol](#)

### **Part A      Strategy**

#### **1          OBJECTIVES**

At the front of the action plan there should be an unequivocal statement about the objectives of the plan. This does not read clearly enough at present and it may be difficult for people to grasp from all the detailed and varied proposals. The objectives should be to:

- reduce Scope 1 and 2 emissions to zero carbon by 2030.
- urgently reduce Scope 3 emissions- criteria to be set by the plan

There should be a clear strategy for achieving these objectives, with a summary of the different actions required to meet these goals, and a hierarchy of prioritisation dependent on how effective they will be in achieving them.

#### **2          SCOPE**

It is confusing to include some biodiversity measures within the Climate Action Plan; these should be covered comprehensively by the Biodiversity Action Plan and excluded from this plan. Ideally the two plans would be developed at the same time and be fully integrated from the outset. The development of the Biodiversity Action Plan should be accelerated to catch up with the Climate Action Plan by no later than June 2020.

### 3 URGENCY

We would like to hear a greater sense of urgency in the proposals. This consultation is taking place almost a year after the Council declared a climate emergency, and immediate actions need to happen now. We think that the time frame is not rapid enough, and generally would like to see these accelerated. We think that the Council should be urgently prioritising the following:

- the public information campaign
- the most effective actions for achieving a zero carbon Camden by 2030
- education of staff and councillors. At present there does not appear to be a consensus amongst councillors that action regards the climate emergency is a 'primary role' for the Council.

### 4 LEADERSHIP

As suggested in our Action Plan (June 2019) we think that it is very important that Camden establishes a Climate and Ecological Emergency Working Group within the Council, to provide leadership on the delivery of ambitious climate and environmental targets. This group should report openly to full Council on a 3-monthly basis and ensure that the Council's resources are allocated in a way that responds to the Climate Emergency.

### 5 DEFINITION OF ZERO CARBON

More clarity is needed regarding the definition of zero carbon, and zero carbon targets. The definition given in the consultation document is of 'net zero carbon' across Scope 1, 2 and 3, which is too generalised to be very helpful.

We think that Camden's objective should be aim for Zero Carbon by 2030 without off-setting for Scope 1 and 2 emissions, ie. within its own boundaries. Regards Scope 3 emissions, Camden should aim to do all it can to reduce the carbon-footprint of the borough overall. This needs a specific plan for Scope 3 emissions to be developed.

'Net Zero' means a balance between carbon emissions and carbon removals (e.g. trees, Carbon Capture and Storage). Only by removing carbon from the atmosphere can we really 'offset' emissions and that we should use the word 'offset' very carefully. The Committee on Climate Change figures indicate that by 2050 global carbon emissions have to be approximately 10% of what they are today; the most important point is that we have to reduce emissions very significantly. Studies show that It will be extremely difficult and expensive to offset a large part of global emissions. It is therefore most important to focus on carbon reduction solutions in the UK including home insulation. We take the view that in the short term off-setting, whether by paying to reduce emissions or remove carbon from the atmosphere, has a role to play in terms of corporates quickly reducing their emissions,

and in effect factoring in a carbon price, but this has to reduce exponentially so that ultimately corporate emissions in the UK are minimal.

## 6 WASTE, RESOURCES AND CIRCULAR ECONOMY

There is very little proposed action regards the use of resources and waste management, which is vital in order to reduce Scope 1,2 and 3 emissions. Camden has a clear role in waste management but unfortunately is underperforming in this area, with a lack of recycling facilities and food waste collection in public spaces and on housing estates, and poor service delivery from Veolia. This needs to be addressed as a matter of urgency. In addition we need to consider innovative solutions, shifting our approach to more efficient waste minimisation strategies.

Camden should therefore:

- Invest in low-carbon means of dealing with waste. Withdraw from the new North London Incinerator in Edmonton, which contractually ties Camden into producing large quantities of refuse for incineration for at least 30 years, and work with partner councils to have the project cancelled.
- Invest in preventing waste, in particular re-use, repair and re-manufacture business centres, and find space for them in site allocation plans. This should include financial support, training schemes and apprenticeships, as well as the use of innovative approaches such as pop-up shops to support start-ups in this field, noting Sweden's approach with small shopping malls for reuse, repair.
- Take on board strategically the potential for circular economy solutions in relation to construction and the council-wide infrastructure that may be required for storage of materials and workshops for repurposing building materials etc and commit to developing a requirement for planning purposes for a "circular economy statement" as being done by the GLA.
- Require all new developments in Camden to include standardised recycling and food waste recycling systems.
- Take measures to discourage the use of single use items throughout the borough.

## 7 CLIMATE JUSTICE

There is no reference to the impacts of the climate and ecological crises on the most vulnerable communities both within Camden and in the global south. Climate Justice is inextricably linked with social justice: it responds to science and acknowledges the need for equitable stewardship of the world's resources. This is something that Adam Harrison made reference to when he made the case for Camden's declaration. A Climate Justice policy needs to be developed, and there are a number of ways in which this could be done:

- The most vulnerable socially and economically within Camden often live in the most polluted areas with limited means to make proactive choices to live in a sustainable way. This includes the elderly, who are an increasing proportion of the population. The Council needs to look at ways to support these groups.
- To raise awareness of the impacts of man-made climate change on countries in the global south CEC suggests that Camden develops a programme 'twinning' with a community living with that experience. For example, there is a large Bangladeshi community in Camden, and areas of Bangladesh have been affected by flooding; Somalia is affected by drought. Twinning is an opportunity for both parties to learn and share from each other in a cooperative and equitable way.
- Camden could engage with the 'Sustainable Development Goals', adopted by all UN member states. This would raise awareness within the Council of these goals and encourage schools and youth groups to utilise the many resources available to them.
- Camden is already a Fairtrade Borough and supports this initiative, but there is a need for development and publicity of the benefits of Fairtrade both in terms of social justice and climate change. The Council could do more to embed Fairtrade in its procurement policies, encourage schools and faith groups to become 'Fairtrade'.
- Camden should model and monitor impacts on jobs and income redistribution within the borough which may occur and address any issues that may arise such as skills for transitioning to other areas of work, and publicise the positive synergies between this shift and local well-being.

## 8 RELIANCE ON THE COMMUNITY FOR IMPLEMENTATION

We think that there is too much burdening of community groups with the expectation of delivering the proposed actions. This is not sustainable or realistic. The Council has more resources and manpower at its disposal than individual members of the community, many of whom are working full time. We also take the view that businesses and large organisations in the borough must also shoulder some of this responsibility.

## Part B CEC'S comments on the detail of the proposed plan

The text in bold below is taken from Camden's consultation document. The regular text is commentary by CEC. We have tried to keep our comments brief, as we think that the overall strategy, ie. objectives and setting of prioritised targets and milestones over the next critical 10-year period is the more important issue (see Part A).

## YOUR VISION

*CEC comment:* We agree that the four areas set are crucial to addressing the climate emergency, and we acknowledge the desire to ground the proposed actions within the scope of Camden's ability to act. However, as stated above, we are concerned that the vision statements limit the potential for the development of a more comprehensive strategic approach and that there are insufficient targets and milestones to ensure effective change. The four areas are not clearly defined and appear somewhat arbitrary; we urge a wider scope with areas interlinked with the key objectives.

- **People – Everyone who lives, works, studies and visits the borough will be well informed and actively contribute to tackling the climate crisis in all aspects of their lives.**

*CEC comment:* The diversity of Camden's population must be taken into account with the public information campaign in a number of languages, available in a range of different places and settings.

- **Places – Camden's public spaces will encourage and enable healthy and sustainable travel choices and promote biodiversity.**

*CEC comment:* We think that the 'Places' vision statement is problematic. For example, it reads as if biodiversity will only be promoted in public spaces, whereas it needs to be prioritised across the borough, eg in schools and on housing estates, as well as on private land. As stated in Part A, to avoid confusion we recommend that actions concerning biodiversity are covered comprehensively in the Biodiversity Action Plan, and not included in this plan. In addition, the vision is weak as to transport. A net zero Camden will require a reduction in private motorized transport as well as usage of renewable energy for this sector. This vision needs to be developed and communicated positively.

## PLAN STRUCTURE

*CEC comment:* We are concerned that as currently presented it is difficult to understand how the different components add up to deliver the overall objectives. We would like to see the outcomes of the Citizens Assembly incorporated into a more strategic structure. The Citizens Assembly was carried out very quickly over a short time period and cannot answer all the questions or rigidly set the agenda for the future. As set out in our Action Plan (June 2019), we think that there should be a continuation of the Citizens Assembly process, to enable further development.

## PEOPLE

- **In 2020-21, design and deliver a public information campaign on the climate crisis together with the community focussing on “consumption based” emissions in Camden.**

*CEC comment:* We think that the Council should firmly take the lead on a major public awareness campaign, and that this should not be left to the community. This is urgent and should be delivered as soon as possible.

The campaign should not just focus on consumption (Scope 3) emissions but explain what individuals can do to reduce their carbon footprint overall, ie. including Scope 1 and 2 emissions (local transport, heating etc). It should explain the need to address the Climate Emergency and the ways in which we can do so eg. by reducing waste, including food waste, reusing, repairing and reconditioning of products, reducing car and taxi journeys and home deliveries of small items bought online, etc. It should cover a wide range of issues, from climate justice to carbon emissions caused by peat extraction (peat is used in compost which is sold widely in Camden). CEC consider it to be vital to ensure that consumers have the information that they need to make purchasing decisions relating to the sustainability of products and services, such as labelling schemes. The Council should commit to develop relevant policy measures.

- **By 2021, create an education programme for elected members and council staff about the climate crisis, including enabling front-line staff to give advice to residents.**

*CEC comment:* This is vital and should be brought forward to start within the next few months. It should not be postponed to 2021. We urgently need officers to be more informed, particularly planners and educators.

## PLACES

- **Review and amend parking permits and prices to reflect the climate emergency.**

*CEC comment:* This should be implemented as soon as possible and should target the most damaging vehicles, building on and strengthening current emissions related permits.

- **Over 2020-2021, develop a new Euston Area Plan planning framework for the area requiring all buildings and transport serving the site to be zero carbon.**

*CEC comment:* All planning frameworks should be zero carbon. More specific definition is required regards the term ‘zero carbon’.

- **From 2020, support the delivery of community-led local road closures and car free days by simplifying the application process and designing a new “How to guide” with the local community a toolkit and materials to simplify the application process in 2020.**

*CEC comment:* The effort for individuals to do this is disproportionate and will not result in meaningful change. The Council should take the lead on longer-term/ permanent transition of roads to attractive and safe walking and cycling routes, and work with TFL to improve the walking and cycling routes on the local roads.

Camden should trial permanent and timed road closures, for example closing roads to private vehicles during rush hours, and take every opportunity for monitoring road closures, eg. when roadworks are being carried out, to determine the effect on the road network.

- **From 2020, trial the closure of Camden High Street to traffic around the market with a view to a permanent closure.**

*CEC comment:* This will have a minimal impact on carbon emissions. There needs to be more strategic borough-wide plan to designate certain roads as for cyclists and pedestrians only. Nb. The removal of the one-way system in Camden Town would have the effect of making the environment less hostile to pedestrians and cyclists.

- **Over 2020-21, create new segregated cycle routes in line with the Camden Transport Strategy**

*CEC comment:* This strategy should take into account the needs of pedestrians, ie. the elderly, young children and less abled. Camden should reduce traffic on all roads (for example by making residential streets access-only), to make them safer and healthier for cycling and walking. This is cheaper, faster and easier to implement than new segregated cycle routes.

- **Progress a Workplace Parking Levy by 2023 to encourage low-carbon transport choices, subject to the outcome of the current feasibility study.**

*CEC comment:* This programme should be accelerated to be completed by 2021.

- **Progress a range of transformational projects as set out in the Camden Transport Strategy which prioritise sustainable modes of travel.**

*CEC comment:* Clarify which projects are to be prioritised and commit to work with the community to identify them to make the most of local skills and enthusiasm.

- **Review and amend Controlled Parking Zone (CPZ) hours of control to restrict inessential motor vehicle trips with priority CPZ areas reviewed by 2023.**

*CEC comment:* Accelerate programme: to be completed by 2021

- **Seek to increase the number of trees planted in Camden annually in line with Camden's Tree Policy.**

*CEC comment:* Amend the Camden Tree Policy to allow for significant increases in additional annual planting of trees, over and above replacements. The Council should work with charities like Trees for Cities and find other means of funding to plant more trees in Camden or other countries.

Any report on new trees planted in Camden must include the number of mature trees felled - for whatever reason - during the same period. More should be done to protect existing mature trees within the borough. There should be a stronger presumption against felling any mature tree, with only minimal exceptions for health and safety. Camden should reform its tree management policy regards pollarding (reference Trees on the Edge report to Environment Scrutiny Committee).

- **Lead the delivery of transformational low emission transport projects in Holborn, Camden Town, Kentish Town and Frognal by 2023**

*CEC comment:* We need projects of this nature to be carried out over the whole of the borough.

- **Increase the number of street closures around schools through the Healthy School Streets programme.**

*CEC comment:* Implement street closures around all schools over 5 years.

- **Increase the number of segregated cycle routes in Camden as identified in the Camden Transport Strategy**

*CEC comment:* We would like to see the proposed programme of works set out in the Transport Strategy to be radically accelerated, to be completed by 2025 rather than 2042, with clear interim targets. This should be accompanied by a rapid increase and expansion of traffic-calmed, access-only streets.

## **BUILDINGS**

- **In 2020, deliver a Retrofit Summit for residents, businesses and community groups to develop our understanding of the retrofit challenge.**

*CEC comment:* We support this. Camden should work with London Councils to obtain funding from central Government and the GLA to help fund retrofit by residents and businesses.



- **In 2020, establish an expert panel to design a new retrofit policy and programme for Camden in collaboration with other London boroughs as part of the new London Councils Climate Programme.**

*CEC comment:* Clarification requested: is this in collaboration or shared learning? We strongly support this action, and the proposed retrofit works in relation to the Council's own buildings, but would like to strengthen the proposal by including:

- targets to ensure insulation of nearly all Camden's homes and office buildings by 2030
- retrofitting of residential and commercial buildings not in the Council's ownership.

- **From 2020, require all major developments in Camden to be zero carbon (subject to new London Plan adoption).**

*CEC comment:* The zero carbon requirement should apply to all development in Camden, not just 'major' development. A better definition of zero carbon is required in respect of planning requirements, including embodied carbon.

- **From 2020, require all major developments in Camden to calculate to whole life carbon emissions of their development to include all operational and embodied carbon.**

*CEC comment:* As previous comment, why restrict this to 'major' developments? Calculating whole life carbon is going to make little difference on its own; it needs to be linked to targets, that ramp up over the next 5 years.

- **From 2020, require all Camden led development under our Community Investment Programme to be zero carbon.**

*CEC comment:* CIP should prioritise refurbishment and retrofitting of existing buildings, over demolition and rebuild which is the current default position (please refer to our submission to the CIP Scrutiny Committee dated 03.02.20).

- **In 2020, complete a feasibility study to install a large-scale solar project on housing estates. Subject to feasibility, deliver the project in 2021 and extend thereafter.**

*CEC comment:* Installation of solar panels must be implemented alongside a wider programme of retrofitting estates; we don't want to install solar panels to find out later that the roof needs insulating or part of the roof area is required for air source heat pumps. A feasibility study on its own is insufficiently ambitious; this should include a commitment to scale up action following the feasibility study. The study should include looking at battery storage potential, particularly on large estates.

- **From 2020, use the Camden Climate Change Alliance business network to drive energy efficiency improvements across the commercial sector in Camden through best practice sharing and consultancy services.**

*CEC comment:* Camden may need to use some kind of enforcement to obtain meaningful change, eg. all EPC -rated buildings less than an 'E' cannot be leased out, etc.

- **By 2021/22, deliver a pilot low carbon housing scheme to reduce embodied emissions. Learn lessons from the pilot and subject to findings, expand the programme.**

*CEC comment:* All pilots should include low embodied carbon and zero operational energy, etc. There is no point having pilots looking at separate issues because it is often the interplay of these targets that is the challenge, eg. concrete is good for thermal mass but bad for embodied carbon.

- **In 2020-21, create a public database of all renewable energy installations in Camden.**

*CEC comment:* Camden has information about all energy use in their buildings now (Camden Open Data). This should be benchmarked and set against targets so that immediate changes can be made to the operation of buildings ahead of any retrofit. An approx. 20% saving may be achieved just by making minimal changes.

- **In 2021, subject to funding, deliver a pilot low carbon community heating project at a council housing building to develop our understanding and inform a costed strategy to remove fossil-fuel heating systems from council buildings by 2030.**

*CEC comment:* LB Camden should not make district heating the next CHP. Consider carefully if district heating is the right route to net zero.

- **In 2021, review and extend the Camden Climate Fund to provide financial support for energy efficiency improvement and renewable energy and heat deployment with a focus on the fuel poor and community groups.**

*CEC comment:* Ensure funding for deep retrofit (zero carbon) only otherwise full benefits are not achieved and future retrofits will be required.

- **Over 2021-22 complete a feasibility study into installing renewable energy systems on non-domestic council buildings.**

*CEC comment:* Always prioritise fabric-first, deep retrofit first.

- **Over 2020-21, devise an approach for how energy efficiency and heating upgrades to a Council housing estate can be financed and delivered with support from a major development in the vicinity. Subject to findings, deliver a pilot scheme in 2024-25**

*CEC comment:* This needs to be delivered more urgently.

- **By 2025, develop a carbon offsetting scheme for local residents and businesses that directs funding towards local carbon reduction projects.**

*CEC comment:* We do not agree with this. The programme to get Camden to zero carbon cannot be funded by a failure to do so. Offsetting should not be part of this programme, even as an interim solution. Please delete this item

## ORGANISATIONS

- **Create new governance with citizen participation to monitor and evaluate the Climate Action Plan for Camden. Recruitment for this panel will begin in 2020.**

*CEC comment:* We support this, subject to further information. A Citizens' Panel can provide a useful structure for engaging the community in informed dialogue. However, it is important that this is supported by an advisory committee of experts including NGOs and professionals. There should also be a related working group of local institutions eg universities, railway stations, depots, hospitals, large corporate offices within Camden that is focused on collaborative action by those institutions, and subject to challenge by the Panel. The role of elected councillors should not be forgotten and all scrutiny committees should have a clear role and duties in relation to the climate emergency.

- **Amend the Council's Constitution in 2020 to require all Council decisions to protect or improve the natural environment.**

*CEC comment:* The proposed text is currently inadequate. The revised text needs to explicitly state that the Council should take an active role in lowering CO2 emissions and review all expenditure through the 'carbon lens'. This is not adequately covered by the phrase "protect or improve the natural environment".

- **Create a new Sustainable Procurement Policy and procedure for all Council purchases over £100,000**

*CEC comments:* Delete "over £100,000". All purchases should be made on the basis of a robust Climate and Ecological Emergency policy. Procurement of the Council's service contracts urgently needs new tender scoring criteria: CEC propose that 'Climate and Ecological Emergency (Mitigation and Adaption)' has its own section in the tender criteria rather than being part of 'social value', with a total score of at least 10%, preferably 15%.

- **In 2021, extend the citizen governance to scrutinise the climate progress of other major institutions in Camden, subject to their agreement.**

*CEC comments:* We think that 'scrutinise' is the wrong word. We should be engaging with and learning from other institutions.

- **Make 5 Pancras Square plastic free by 2020 and all other sites plastic free by 2021, including all Council events.**

*CEC comments:* This should include all Camden's offices, depots, schools and nurseries.

- **Make Camden's vehicle fleet 100% low/zero emission by 2022.**

*CEC comments:* Use electric cargo bikes wherever possible. Use vans that can be charged overnight at depots (EV charging points to be provided). Move towards leasing vehicles if necessary to enable decarbonisation to be accelerated; if vehicle already leased, update contracts to accelerate decarbonisation.

- **Provide an annual update on the divestment of Camden's pension fund to ensure transparency.**

*CEC comment:* This is ineffective for change: we need to change the strategy for the reform of the pension fund and commit to divestment within the next 2 years.

- **Undertake an assessment of the Borough's scope 3 carbon emissions and use this to inform further actions and projects to reduce wider consumption-based CO2 emissions in Camden.**

*CEC comment:* We agree that this is very important.