



22 September 2025

Climate Emergency Camden's response to the proposed Climate Action Plan 2026–30

1 SUMMARY

Climate Emergency Camden (CEC) appreciates the opportunity to comment on Camden Council's [Draft Climate Action Plan 2026–2030](#).

We recognise that climate change is an existential threat, requiring everyone to work together for the common good.

We note the absence of a plausible national decarbonisation plan into which local government plans could otherwise fit. The paucity of guidance from central government complicates the task of local government in making its own plans.

With this context in mind, CEC acknowledges the considerable effort, hard work and commitment of officers within the Sustainability Team to address climate breakdown. However, we believe that unless the Council takes corporate responsibility for meaningful action, there will be little progress on mitigation.

We don't think that the ecological emergency should be omitted from the plan. It was part of the original Citizens' Assembly for good reason: the climate crisis is one part of a much larger crisis affecting all earth systems, and focusing only on climate change is not only a blinkered approach, but omits crucial elements in the climate emergency connected with global resource extraction and exploitation.

We welcome the inclusion of adaptation, resilience and social co-benefits in the plan, but we consider the overall approach vague, fragmented and non-strategic. A climate action plan is most likely to yield the desired results if it clearly articulates measurable targets as well as interim targets, unambiguous indicators, prioritised actions, and a monitoring and reporting framework.

We would be happy to support the Council in building these aspects into the plan and ensuring it is goal-oriented. For now, we are sharing some feedback that we hope will be of use as you fine-tune the document.

2 ASSESSMENT OF THE PREVIOUS PLAN

It would be helpful if the plan included a look back at its predecessor, Camden's Climate Action Plan 2020–2025, so that the Council and residents could see what has been done, what has succeeded, what has fallen short, and what unexpected difficulties have arisen. The lack of any sort of assessment of the implementation of the previous plan could suggest that the Council may not be making the best use of lessons learned – be they positive or negative.

The plan states that 'emissions from the Council's own estate and operations have reduced by 64.5%'. It would be very helpful if the Council could explain and detail the extent to which this reduction is due to less energy being consumed, or rather to reductions in the emission factors (for example, more wind and solar electricity in the national grid).

The plan envisages supporting the installation of solar panels by businesses (page 38, action 1.1). In this regard, it would be helpful if the Council could provide a brief overview of this work to date, for example by specifying on which schools, libraries, and other buildings or locations panels have been installed; describing the experience; and stating how much electricity was generated (per month), how much income was generated by selling electricity back into the grid, how much money was saved on electricity bills following the installation, and how long the payback period is.

In Priority 5 (Empowerment, education and communication), point 3.5, the plan states: '*We will encourage behaviour change through Ecopoints.*' Giving rewards to people if they adopt more sustainable habits appears to have potential and is perhaps a fruitful way forward. Since the Council has been running (and paying for) an Ecopoints programme for almost ten years, it would be useful if the plan included the Council's assessment of the experience, including insights into how the programme could perhaps be improved and expanded.

The previous plan achieved single, small-scale outcomes – such as one 'Library of Things' and one 'Fixing Factory' – without identifying strategic means by which to roll these out across the borough. Meanwhile, Camden Council has not fulfilled promises with potentially much larger benefits, such as retrofitting existing housing estates when looking at regeneration options. In addition, the Council has yet to deliver a public information campaign, in line with its October 2019 [pledge](#) to 'tell the truth to Camden citizens about the scale and seriousness of the emergency'.

3 MITIGATION OF GREENHOUSE GAS EMISSIONS ('CARBON')

We acknowledge the efforts the Council is making to decarbonise its own corporate territorial emissions, and we are glad to have had a chance to share ideas about how these could be better measured.

We would argue, however, that the draft plan underestimates the Council's role by stating that it 'only has direct influence over a third of Camden's emissions', namely the

direct emissions categorized as Scope 1 and 2. Indeed, the initial Climate Action Plan committed the Council to assessing indirect (Scope 3) emissions for which it is responsible. We are not aware of any corresponding report and would be grateful for an update.

In the meantime, we would make the case that the Council could exert considerable impact on Scope 3 emissions, for instance by running targeted public information campaigns aimed at avoiding plastic packaging or unnecessary work-related travel.

As specified on page 41 of the draft plan, the borough's Scope 3 emissions also include greenhouse gases associated with waste management. The plan notes that in 2023/24, 'Camden households generated over [55,000 tonnes](#) of waste, with only 29% recycled'. This means that more than 70% of our household waste continues to be sent for incineration although [more than half](#) of this volume could be recycled if properly [sorted](#). As we have previously noted, every 1% increase in the recycling rate reduces disposal costs by an estimated [£82,000](#), based on a report issued by Islington Council in May 2025. We look forward to supporting the Council in developing an effective, evidence-based strategy (and Reduction and Recycling Plan) that can deliver the household waste recycling target of 50% by 2030, as per the new North London Joint Waste Strategy (NLJWS). The Climate Action Plan could usefully integrate the new NLJWS recycling target into the Council's Scope 3 emissions-reduction strategy. (On a related note, it would be useful if the plan could clarify what is meant by 'low-carbon waste heat', as heat derived from waste incineration is not 'low-carbon'.)

Another Scope 3 example relates to the construction of new buildings. The Greater London Authority (GLA) has aspirational targets for emissions resulting from construction, but Camden Council's planners don't require developers to meet these targets and permit business as usual, with high-carbon construction up to 850kg per m². The Climate Action Plan makes no reference to the UK Net Zero Carbon Building Standard, which sets limits on the rate of carbon emissions for different types of building. Unless the plan – and other Council policies – are amended to embed such approaches to minimising Scope 3 emissions, the Council will continue to prioritise 'operational carbon' of construction, as at Agar Grove, at the expense of 'embodied carbon'.

Yet another example is the Council's failure to consider the carbon emissions caused by Highway works, such as those associated with the import of new granite kerbs from Europe when existing kerbs could be retained. Importing kerbs resulted in hundreds of tonnes of unnecessary carbon emissions at the Queen's Crescent public realm works, for instance.

4 'ZERO-CARBON, CLIMATE-RESILIENT ECONOMIC GROWTH'

The plan refers to 'sustainable growth', 'socially and environmentally responsible growth' and 'zero carbon and climate resilient economic growth' without defining these terms. Although the plan appears to be referencing the Government's GDP growth agenda, it doesn't comment on it directly. It bears pointing out that the Government's agenda doesn't respect the planet's ecological limits for carbon emissions or other critical planetary boundaries.

Doughnut Economics is a methodology that considers both local and global impacts. Councils in Leeds, Cornwall, Ladywood in Birmingham, Glasgow and Oxfordshire have used it to guide decision-making in a way that considers both global and local impacts on Earth's life-supporting systems and people's ability to thrive. This type of thinking appears to be absent from Camden's plan, which seems to endorse the old growth model. One example of this is the Council's continued demolition and rebuilding of buildings, with associated loss of ecologically rich habitats. This approach is incompatible with living and thriving within the constraints of planetary boundaries.

The plan's reference to 'socially and environmentally responsible growth' also conflicts with the reality that some council services need radical improvements for the sake of social and ecological outcomes. One example is housing management, where the inadequacies of the housing repairs service result in unhealthy homes and a failure to provide well-maintained buildings that could then be retrofitted.

5 ADPATATION AND RESILIENCE

The plan recognises that climate change will impact people living in Camden. However, it does not include recognition of the threat from ecological collapse and its effects on other systems, such as food supply chains and the economic system.

The measures proposed for adaptation are not significantly different from what Camden is already doing – adding street trees, rain gardens and SuDS. It is not clear to what extent these measures are designed to be strategic, with measured outcomes, but they go nowhere near the emergency planning that is required here in Camden.

Emergency planning is already a responsibility of the Council, notably under the Civil Contingencies Act 2004, but the draft plan makes no mention of this work. The document lacks a clear overall strategy, such that efforts to enhance resilience are not linked up with risk-reduction strategies.

Food resilience is one example: the Council's plans to tackle food insecurity, minimise food waste, and promote healthier food choices are not joined up with emergency planning that might be conducted by the Borough Resilience Forum (BRF). Such planning would involve mapping food supply chains and vulnerabilities, conducting audits of local food capacities and assets, contributing to risk registers on food risks, building networks of expertise and trust to identify where help might be relied on, and serving as an early warning system on food matters. Camden Council could bridge the food-related emergency planning gap by establishing a food resilience committee within the BRF, as [recommended](#) by the National Preparedness Commission.

As it stands now, the plan appears to limit the Council's emergency response role to the provision of 'advice to residents on how to take action, access support and protect themselves from climate hazards' (p. 43) and 'communications that notify residents of extreme weather alerts and provide guidance about how they can protect themselves' (p. 44). Emergency planning requires a more comprehensive approach, one through which all relevant staff is properly trained, public information campaigns inform all residents in advance, and dedicated BRF-level expert groups meet regularly to ensure

emergency plans are up to date and ready to implement (based on previously conducted networking, risk assessments and mapping exercises – see above).

At the corporate level, the Council's decision-making is not guided by the need to consider adaptation and resilience. Take, for example, the proposals for the Regis Road Industrial Area, where a fit-for-purpose housing repairs depot (recently refurbished at a cost of £8.4 million) and a recycling centre are due to be demolished and rebuilt at huge carbon and monetary cost, with a view to facilitating private investment in film studios that are not needed. This is a tragic missed opportunity for what could have been a genuinely sustainable development – one that could have increased local resilience. Instead, this development actively reduces resilience by reducing the capacity of smaller businesses in Camden to service the borough and provide local jobs.

6 PRESENTATION OF THE PLAN

Length: The plan is 68 pages long. The previous plan was 30 pages long. It is not clear why the new plan requires twice as many pages.

Images and figures: It is not clear how the dozens of images are supposed to improve the reader's understanding of the plan. It would be better for the Council to write a shorter document and include only images which are essential. Cross-references in the text and sequential numbering of corresponding graphs would also be helpful.

Repetition: it is not necessary to repeat statements. For instance:

page 6: Borough-wide emissions have fallen by **52%**;

page 11: borough-wide direct carbon dioxide emissions have reduced by **52%**.

Page 4: driving our own climate emissions down by **64.5%**.

Page 6: emissions from the Council's own estate and operations have reduced by **64.5%**.

Page 40: Camden has reduced emissions from its corporate estate and operations by over **64.5%**

Statistics: the plan could have greater credibility if the various statistics regarding emissions were explained and placed in context. For instance:

Page 6: Borough-wide emissions have fallen by 52%, and emissions from the Council's own estate and operations have reduced by 64.5% (the base year needs to be explicit).

Page 13: Around 84% of greenhouse gas emissions are generated by buildings and 16% result from transport (what is the source data, how are these numbers calculated?)

Page 13 The Council has powers or influence over approximately 1/3 of emissions in Camden (What is the source data, the calculation method and the definition of 'powers' and 'influence'?)

Readability: the plan would benefit from proofreading to eliminate typos and other errors.

7 OUTCOMES AND GOALS

The plan envisages seven priorities, but it lacks an overarching strategy that would make it, and them, easier to understand. At present, it is hard to understand both what they mean and how they relate to one another. They seem muddled.

There are 102 outcomes: far too many. This was also a problem with the previous Climate Action Plan, which spawned a myriad of actions and projects that became impossible to track and monitor, so the plan lost its original sense of direction and ambition. In this case, the plan has less initial clarity, increasing the likelihood that it will become even less comprehensible over time.

We don't think that the draft plan should be adopted in its current form, for the reasons stated above. It needs further work to be an effective strategy for mitigation of, and adaptation to, the climate and ecological crisis.

END