Consultation On Enfield's Climate Action Plan

We thought we should reply to the Council's call for consultation on their climate action plan and comments have to be in by Sept 5th. Rather than write long papers we thought we would make some specific points about the successes, deficits and omissions in the plan. Here is a draft we are working on.

Consultation On Enfield's Climate Action Plan

Progress Report and Carbon Emissions Review

August 2021

Introduction

1) EnCaf welcomes Enfield Council's commitment to annual review, publication of performance and progress, and public consultation about the progress of its Climate Action Plan and Carbon Emissions Review.
2) EnCaf is pleased to participate.
3) Enfield Council declared a Climate Emergency on 10 July 2019 at the 3rd attempt. The preceding report to cabinet noted that following the publication of its 2020 strategy "Sustainable Enfield" in January 2013, the Council had by 2017 reduced its carbon footprint by 45% vs 2008/09, exceeding its own target three years early.

Emissions

4) The Climate Action Plan Progress Report published two years after the declaration of emergency, and a year after the publication of the Climate Action Plan, celebrates a reduction in emissions of 19% between 2020 and 2021. This is factually correct but is not a sustainable change. The sister publication, the Carbon Emissions Review, reveals the part that Covid19 played because of the "resultant reduction in operation and occupancy of council buildings and facilities".

Our reading of the figures is that the bulk of the fall in emissions is attributable to electrical energy (Scope 2) emission reductions (buildings) i.e. Covid related.

5) The LED streetlight replacement programme has made a demonstrable, and sustainable, difference to emissions which we welcome.
6) Other actions and planned priorities in the strategy do not have such obvious causal links with carbon emissions, nor clear procedures for calculating them. Therefore we support the pursuit of improved understanding of Enfield's carbon emissions because this should provide the public with meaningful, quantitative evaluations of progress in reducing carbon emissions whether by retrofitting, active transport, or scrutiny of carbon embodied in goods and services procured or building and development processes.
7) Whilst embodied carbon is in Scope 3 emissions, which "are not covered by the Council's carbon neutral commitment", because embodied carbon "is a significant contributor to the Council's wider emissions" the draft Ethical and Sustainable Procurement Policy is a positive step so long as it is implemented comprehensively and demonstrably reduces Enfield's emissions.
8) The Review of Carbon Emissions 20 – 21 is admirably transparent about the significant impact of Covid 19 on reducing emissions , contributing about three quarters of the scope 1 and 2 savings, so it's disappointing that the introduction to the Progress report refers to emissions having "fallen significantly in the past twelve months" without qualification.
9) The Council commits to "a regular cycle of reflection and refinement". If its target of net zero emissions by 2030 and Borough wide by 2040 is to be achieved the refinements must address the balance between offsetting and cutting, and make adjustments in favour of the latter, underpinned by objective measurements and lucid calculations.
10) Enfield Council describes its plan as bold and ambitious, requiring innovative solutions for the whole Borough to be carbon zero by 2040. However its exclusive focus on Scope 1 and 2 carbon emissions frustrates the influence and innovation it seeks. For instance:
    - there is no process for engaging stakeholders in Enfield, no vision of the kind of stakeholder partnership envisaged or even a plan for creating one. We are not convinced that "using established council and community communication channels to *passively* engage with households across Enfield" is adequate to the task.
    - links with key policies aren't made
        ~ With the poverty and equality strategies, essential for addressing climate justice and avoiding the poorest in our communities from suffering the worst; which all the national and international evidence points to being the case.
        ~ Evidence suggests, too, that the least equal societies emit more greenhouse gases and demonstrate less biodiversity.

- opportunities for embracing Community Energy are overlooked
  - ~ for instance a local community energy initiative at Bush Hill Park Station Garden Project and the opportunities afforded by Community Energy England
  - ~ or the means by which community energy can be used to source district heating projects
  - ~ neighbourhood retrofit projects that can harness community commitment

11) The council could look beyond its boundaries to other local authorities to see how they engage with partners.

Offsetting

12) Much of Enfield's Climate Action Plan is based on offsetting rather than cutting omissions. The latest IPCC report states that cutting emissions is a priority. Offsetting is an addition and not an alternative
13) One example is Energetik's "low carbon heat network" scheduled to provide heating for 30 000 homes, while the feasibility of retrofitting even more is explored. The heat is provided by burning waste at a significantly enlarged replacement incinerator at Edmonton and is deemed "low carbon" because the calculations assume that without the heat network all heating will be provided by burning gas i.e. the emissions of the incinerator are offset against an assumed alternative. As approaching 50% of electrical energy is generated from renewable sources and new buildings are constructed to BREEAM "outstanding" standard for sustainable homes, potentially with Passivhaus standards of energy performance, offsetting of this nature will be seen as ill conceived.
14) A further example: Chase Restoration project is a headline initiative and yet, at best, it will simply offset half of the remaining council scope 1, 2 and 3 emissions, once the council has achieved the maximum reduction in emissions in these areas by other means, and therefore will have little impact overall on much more significant Borough wide emissions.
15) In any case many scientists now argue that planting trees is limited in its impact on emissions and can in some cases release rather than absorb carbon dioxide to the atmosphere eg because of the disturbance of carbon dioxide reservoirs in the untilled soil. Natural regeneration is far more effective.
16) The Council's over-reliance on tree planting is further evidenced by the inclusion of the Chase Restoration as one of its five achievements, and by using tree planting as a proxy for re-wilding, itself identified as a priority for 2021-2022. In so doing, the council undermines rewilding as an important strategy in mitigating both climate and ecological emergencies. Furthermore, by planting trees on farmland, the council downgrades the development of sustainable agriculture when food shortages could be a major problem in the coming decades.

Encouraging self-sufficiency and sustainable farming is vital and yet there is little about this in the council's plan. **See Appendix 1**

Adaptation and mitigation

17) The Council's own review acknowledges that adaptation and resilience are areas that "are not at the core of the Climate Action Plan; in our view, a major omission. Some local authorities include adaptation strategies e.g as complementary to their mitigation strategy. In its review, perhaps in response to earlier criticisms, Enfield has identified "adaptation and resilience" as key challenges but address the challenge only in the context of the existing tree planting programme which we think is a limited approach, especially since the latest IPCC report stresses the urgency with which all sections of society plan for climate change adaption.
18) An adaption policy tackles risks of flooding, extreme weather conditions, population displacement, food supply. The council's approach to the management of flood risk, the creation of urban wetlands and rain gardens; their partnership with Thames 21 are exemplary. But the impact of climate change on public health is overlooked and few, if any, policies address the necessary and feasible adaptations eg provision of sufficient green apace and trees for shade in the east of the borough. Raising *"the importance of adaptation and mitigation in the health sector to protect vulnerable residents from extreme weather"* and then identifying *"opportunities to build on existing positive areas of work"* followed by "*There will need to be further consideration of the potential impacts of climate change on the delivery of health and social care services, as well as what role adaptation and resilience can play in mitigating negative impacts."* is embarrassing in its lack of urgency and scope. The impact of climate change on public heath will be profound – loss of life, illness, stress and increasing isolation.
19) Other policy areas such as active travel, improving (and using) public transport, adopting school streets and creating low traffic neighbourhoods are not only important because of their impact on emissions. The consequent gains in physical and mental health are well established: good health and well-being, longevity, a healthy old age and an enhanced sense of belonging and community coherence.
20) In effect, if implemented comprehensively, such policies are important adaptations to climate change.
21) The council could build community capacity and amplify its own effectiveness by embracing the wealth of community assets that exist in Enfield, creating a web of formal and informal groups and organisations.
22) Enhancing social capital helps to address the crisis in public health by such means as asset development, social mapping and collaborative networks with

stakeholders in civil society, the NHS Clinical Commissioning Group and the local authority.

Policy - Recycling

23) Enfield's record on recycling is poor and has not improved in three years, yet the Council expects to become one of the best Boroughs in London on recycling. In the absence of a plan this remains an ambition rather than a reality; an ambition undermined by the planned return to weekly collections, against the national policy direction.
24) Further, a new, much larger, incinerator will exacerbate the disincentive to recycling which is observed nationwide.

Policy - Building

25) Buildings and their construction together account for **36 percent of global energy** use and 39 percent of energy-related carbon dioxide emissions annually.
    - Planning permissions for large developments have been given since the declaration of climate emergency, and a considerable development of new buildings in the Borough is planned. "Embodied Carbon" is seen as a major challenge and the requirement in the London Plan for whole life carbon assessments for new developments is seen as helpful in reducing embodied carbon in new developments, but is a long way to implementation.
23) Enfield should seriously consider the impact on the proposed new Incinerator on the environment and the local population and engage communities in the Borough on this. A construction that, once built, emits 700,000 tons of carbon dioxide in the atmosphere will not reduce the carbon footprint in the Borough and will impact on its goal to reach carbon zero for the Borough as a whole by 2040. The embodied carbon in the decommissioning, demolition and reconstruction of the incinerator should, surely, be a consideration in this progress report.

Policy – divestment

24) Enfield Council's Declaration of Climate Emergency, more than two years ago, committed to investing in assets which contribute to a de-carbonised economy. So to read in the progress report that in January 2021 the Council's Pensions and Investment Committee agreed "to look at" suitable investments and that in March 2021 the Pension Policy and Investment Committee "discussed" the Responsible Investment Policy and agreed the commitment to a divestment target, and then discover that as a result officers had only then been "tasked with creating a plan to progress with divestment" was a disappointment.

Policy – SME

25) Many businesses have reported that they would like to be “more green” but do not know how to go about it. The intention in the progress report to “work with regional partner local authorities to support small and medium businesses (SMEs) to address barriers to energy efficiency and reducing their carbon foot-print” is welcome.
26) For reasons already explained (10, 11, 21, 22) EnCaf would like to see the active involvement of local organisations such as Enterprise Enfield which has already embarked on this journey to support local SMEs.

Community involvement

27) Similarly we hope that in pursuing the next step of its journey to zero carbon by 2030 and much more significantly for borough wide emissions to be net zero by 2040, the Council should develop an open and inclusive network collaboration system unencumbered by Covid 19.
    - Community Panels exist, work, and are inexpensive e.g. the model developed over housing development in Southgate.
    - To bring our diverse communities onboard by 2040, appropriate steps need to be taken now.

Appendix 1

Recent research (2012) from the Forestry Commission reports that carbon sequestration rates vary and depend on tree maturity so it will take some years to reach the figures quoted. And, further, that where permanent grassland is manually planted, carbon will be lost by disturbance due to planting so will take some time for net carbon gains.

To be confident about the claims being made for the efficacy of Chase Restoration in significantly mitigating the council's carbon emissions we need better information about the assumptions made, the trade-offs and other pertinent considerations: integrating trees with food production (agroforestry); replanting and better management of hedgerows; natural regeneration; carbon capture in soils and wetlands.
The checks and balances of carbon offsetting need to be transparent. For instance, using the figure of 3.9tCO2e offset per hectares per annum and the proposed planting of 300 hectares, we can calculate a rough estimate of 1000 tCO2e (actually 1170 tCO2e) carbon sequestration each year beginning, presumably, on maturity? Say, by 2040, since the planting isn't expected to be complete by 2030.

Enfield's Climate Action Plan gives some figures about emissions.

- Scope 1 and 2 emissions produced by the council's own activities are currently 21,907 tCO2e each year.
- Scope 3 emissions (indirectly from the council's activities) are currently 81 257 tCO2e each year
- Borough wide emissions (that's us) are currently 939,440 tCO2e each year.

This is not to say that woodland planting is a bad thing, but carbon offsetting is not going to dent our emissions or help us realise the 2030 and 2040 targets, and there should be transparency about this.

Further, it's important to emphasise that sequestration in soil and trees depends on these stores being preserved forever - or at least until we have beaten the climate emergency - say, 2200. If the trees are felled or the soil ploughed they are lost, at least partly. These natural stores are threatened by development, eg housing, rail, roads and, of course, by climate change. In short by economic growth and the pursuit of ever increasing GDP and consumption.

REF EnCaf response to Blue Green Strategy here