

# **Enfield Council Response to Extinction Rebellion Comments on the Draft Enfield Climate Action Plan**

## **Background**

The Council welcomes the detailed comments provided by Extinction Rebellion on the draft Enfield Climate Action Plan (CAP). Please be assured that these have been considered and, where they are pertinent to the CAP, will be factored into our thinking as we move forward. The response below aims to address the comments received as far as is practically possible given current calls on our resources.

## **Executive summary**

The first theme 'Council's Operations' is the only theme focused solely on the council's emissions. The other themes are focused on borough wide emissions.

As a result of ongoing work and feedback we have strengthened the actions and KPI's within those sections and included a section providing more detail on how we have looked at the borough wide transition to net zero. We calculate that the borough's transition to net zero will take longer than our own transition and are working through the calculations to see when we can set a realistic date.

We have included an action to review statutory plans at present to see if they are fit for purpose with regards to the CAP. Work is going on internally as to how the climate change emergency will be integrated into procurement and commercial decisions, but more importantly into our day to day work. This will include, like we do with health, taking a climate change in all policies approach. We want to make sure that climate change is the responsibility of everyone working to deliver the Council's wide range of services.

As part of this, in the next draft we will make reference to a) relevant Council strategies b) relevant Council documents.

## **Vision and delivery**

Vision – We have now included vision statements in each theme, setting out a broad vision, followed by what we think this will mean for Enfield by 2030 and beyond. The next iteration will include the borough wide figures and how much we think will possibly be needed to offset by the agreed date.

Targets will be presented in the final draft with a clearer timeline / roadmap outlining expected reductions and milestones (the existing timeline was for illustration). The indicative emissions reduction needed per year is around 7.3%, but a stretch target of 9.1% has been included in the draft.

## **Democracy and External Input**

We plan to produce a public report every year in line with best practice reporting standards that outlines our performance. We acknowledge that it is not clear in the

text around our intention to review yearly and this has been changed. The intention is to report publicly every year by July, in order to include the latest carbon footprint in publications.

The two-year review was suggested as being a larger 'root and branch' review, looking both back and forward, but also at the structures and management to assess whether this is still adequate.

The last major review is due to take place in 2028 (as opposed to 2029) which enables Enfield to work to a two-year plan if we are behind or on track for 2030. We plan to hold a school's summit (delayed to next April because of Covid 19) and we are investigating the feasibility of holding more face to face events rather than passive engagement. This aspiration has been included in the new draft.

### **Transparency and accountability**

The strategy will not contain yearly targets for the Council, although we have set ideal performance between 7.3% and 9.1% reduction in CO<sub>2</sub>e per year. We will make this clearer in the text.

In respect of the borough, the next iteration will include expected targets at 5 year intervals. We will not set yearly targets at this stage, but expect to be able to do so from 2021. However, the CAP does now contain detail on what we expect to see in order to reach net zero on a borough wide basis.

We do not agree with rigidly refreshing the strategy every year for reasons outlined under 'Democracy and External Input' as we feel that simply looking at one year's worth of performance may lead us to reject KPI's that may not see any uplift until later in the decade.

### **Review and Adapt**

We accept that the strategy will need to be refreshed periodically and that technology, policy and consumer sentiment will change within the decade. As stated, our root and branch reviews will take place every two years, although progress will be reviewed every year. The purpose of the two-year reviews is to look beyond performance and understand the management and structural processes and how effective they are on strategy performance.

### **Buildings**

Addressing climate change will be a key overarching aim of the emerging Enfield Local Plan (ELP). The ELP will be informed by the Climate Action Plan, including setting out the role that the planning system and related policies will play.

We will ensure that references to both the London Plan and the emerging ELP are reflected in the next draft. However, the Climate Action Plan is not a planning document and therefore will not contain the level of detail as outlined in your response. Rather it will set out what we expect to see – BREEAM Outstanding, passivhaus, post occupancy evaluation, enhanced biodiversity.

The level of detail that has been asked for will be contained within the ELP, the latest version of which is being prepared. Some of the documents referred to in the response will be out of date by the time the new ELP is developed and do not therefore reflect the aspirations Enfield has around renewable energy, BREEAM and passivhaus as well as other issues. The emerging ELP will also contain requirements for an Urban Greening Factor (as outlined in the New London Plan). This is one example where the emerging ELP will be in line with the New London Plan.

In the course of the development of both this document and the ELP, the need to strengthen all of the supplementary planning guidance has been identified. We will make this more explicit in the next draft.

## **Retrofit**

This section has been strengthened in a number of ways to reflect actions taken during and since the strategy consultation:

- Review of all statutory documents and their fit with the climate emergency and climate resilience
- Making explicit the need to recruit and/or train Retrofit Coordinators within the local authority
- Reporting on the emissions from our own council stock
- Enfield becoming a member of the [Coalition of Energy Efficient Buildings](#) (CEEB). We are only one of two local authorities involved. Our interest is to find ways of developing and financing large scale retrofit across all tenures in the borough. This will include scaling up quick win measures and looking at more whole house mechanisms such as Energiesprong.

Enfield is already investigating low carbon retrofit and we have a track record of installing heat pumps and other low carbon interventions. The strategy outlines some of the first steps, such as improving our EPC database and maximising the funding available.

However, this is one of the hardest areas to tackle in terms of decarbonisation. We have calculated that over the next 30 years over 4,000 heat pumps a year will need to be installed across the borough to replace gas boilers. We are also anticipating that hydrogen boilers will become market ready before the end of the decade and, if viable, will provide an alternative for those homes that cannot be retrofitted with heat pumps and other low carbon heating technology currently on the market.

Realistically however, we do not expect a full low carbon retrofit programme to begin until 2022. This is partly due to the need for the government to provide certainty over funding (which is why we have become part of CEEB in the interim) and because the ongoing changes in national policy.

## **Adaptation**

This is an area that was identified as needing to be strengthened during the drafting. Enfield view this as an area wider than just planning and the CAP will reflect the need to adapt across the built environment, in decision making but also ways to increase community resilience to extreme heat and flooding.

## **Travel**

In terms of transport:

- The Council is committed to increasing journeys made by active and sustainable transport and the CAP makes this clear with related actions.
- There are ongoing programmes of work which support delivery of this, including Cycle Enfield.
- A new Transport Strategy is being developed alongside the Enfield Local Plan. This will set out our longer-term approach to delivering the transport outcomes needed.
- The CAP will include a target on electric vehicle charging with an action plan being developed to meet this.
- The Council is involved with a number of regional and sub-regional organisations, which are working to increase the provision of high-quality transport infrastructure and secure the funding to deliver it.
- The Council has and will continue to lobby for interventions which address vehicle emissions but the priority must be to reduce private vehicle trips.

## **Natural environment**

This is a theme that was still being assessed at the time of consultation. This theme is aimed at meeting several aspirations (which will be stated in the redraft):

- Enhancing a key asset to Enfield
- Providing cooling and management to London's heat island
- Providing flood alleviation benefits
- Increasing biodiversity
- Carbon offsetting capacity
- Surface water flood risk
- Providing amenity to local neighbourhoods.

We acknowledge that we want to make this section as strong as possible and it will change from the version that went out to consultation. One element of this is assigning carbon offsetting values to our green space and infrastructure. For example, how much carbon will an oak tree or a hectare of grassland a) absorb from 2020 – 2030; b) how much carbon will it absorb over its lifetime? We are looking to be as open and transparent about this as possible and are currently working through a number of assumptions that could be used.

Net biodiversity gain – This is outlined in the emerging Enfield Local Plan.

Street trees – This is dependent on identifying suitable locations, including when delivering new schemes so will be included in overall targets for increasing the number of trees in Enfield.

Green roofs and green walls – These are outlined in the emerging Enfield Local Plan and are part of Enfield's adaptation efforts. We will outline the main adaptation approaches in the built environment in the next iteration. Enfield has one of the strongest track records of integrating SUDS into the urban landscape, which we can bring to bear on green roofs. Some green walls require significant irrigation to survive, which, given the demand for water in London, means their introduction needs to be considered carefully.

Green belt – Covered extensively in the emerging Enfield Local Plan.

Food – an area that came through in nearly all responses. Will look to address and work with groups across the borough on this issue.

## **Energy**

The NLWA has responded separately on the Edmonton facility.

The Council is looking to ensure the borough is supplied by a diverse range of energy systems. As stated in the Energy section there are four main energy futures (plus insulation) which include decentralised energy, renewables, heat pumps and hydrogen.

The grid is set to be electrified which is acknowledged in this document and the Enfield Local Plan. Enfield's approach to energy generation and strategy across the borough will be heavily influenced by the Committee on Climate Change's recommendations on reaching net zero and their wider thinking on reducing UK carbon emissions. It is likely that energy in the future will come from a range of low carbon sources.

However, we cannot predict the future. Hydrogen to homes was not seen as viable until very recently and we intend to include that in our plans for Enfield's energy future. Battery storage will also be reflected in the next iteration as well as the need to build to passivhaus levels, which mitigates the need for high demand space heating and cooling.

Enfield is a member of [UK100](#) and we are looking at what we can do to maximise the benefits of our membership.

## **Waste**

We acknowledge that we need to address the principles of the circular economy in the CAP. We feel that in the first instance, given we are going to be increasing our focus on embodied carbon in construction, that this will be the first area in which to set out principles internally and with our suppliers.

## **Divestment**

This has now been defined and the phrasing made clearer. There is already an action relating how we will approach divestment.

## **Influencing others**

The CAP includes various actions where the Council will take a lead in influencing others, for example working with partners to increase retrofitting in the private rented sector and for owner occupied homes. We will also support people to make informed choices.

However, while we can create the conditions for people to play their part in addressing climate change, we are simply not resourced to deliver large scale interventions in areas which are not core to the delivery of our statutory services. In this respect, we have made it clear that we expect the Government and private sector to play their part.

The CAP now includes additional areas of work and targets around how we plan to engage with people and businesses. In terms of business engagement, we are considering the benefits of setting up a climate change partnership or some similar approach.

## **Council Operations**

Carbon emissions – The claim is neither misleading or deceptive. The CAP clearly states that the emissions figure of 42,000 tCO<sub>2</sub> (exact figure 41,812tCO<sub>2</sub>e) relates to FY 2008/9 and includes *all* Enfield buildings. The statement on page 10 is about reductions over a ten-year period to FY 2018/19, when the footprint was measured at 21,000 tCO<sub>2</sub>e.

The information on the Enfield website does not relate to these figures because:

- The starting year for graph one is 2009/10.
- The starting year for graph two is 2010/11.
- The starting year for graph three is 2009/10.

Enfield has previously measured its emissions using the Carbon Reduction Commitment (CRC) Methodology, which from 2014 excluded schools. The claim in the CAP is from six years before that time and does include schools as does the 2018/19 footprint. From 2018/19 schools will be included in every footprint, regardless of CRC methodology. The intention is for the Council to continue to calculate and disclose one of the most comprehensive carbon footprints in local government across all scopes.

100% renewable electricity is confirmed. The move to green gas will be reviewed in 2023 as the market matures. This is no guarantee that there will be a switch to green gas by 2023 however. PPA's have been considered previously and will be again as part of the works streams developed from the CAP.

The reference to LED lights and sensors is a simple example of some of the measures that will be taken, it does not represent the sum total of the energy investment Enfield will take within its own buildings. Standards for Enfield's own new build domestic and non-domestic stock will be set out within the ELP.

The CAP sets a minimum SAP target for all council properties of 84 by 2030. Following a review the next draft will increase this target to 86. The SAP score has been selected as opposed to a vague 'EPC B' for the following reasons:

- 1) According to research by [Sustainable Homes](#) a SAP of 86 is the required minimum for all existing homes in order for the UK to reach its carbon aspirations.
- 2) By setting a minimum SAP this ensures that the worst properties are prioritised
- 3) By setting a minimum SAP this allows us to set stretch targets before 2030 or allows us to incrementally increase the minimum SAP level.

**Sustainable procurement** – The CAP includes a specific action to review and update our approach to procurement to ensure we assess and effectively evaluate the environmental impact of goods and services in order to minimise carbon emissions and reduce the risk of negative impact on the environment from goods and service we use.

**Staff education** – The CAP includes an action to implement a rolling carbon/climate literacy programme, prioritising teams with the greatest impact. Specific training has been identified at several levels in the council. This includes Courses such as Sustainability Leadership; Retrofit Coordinator; Green Finance Certificates and online training. While not in the strategy at this point, this element has been developed.

**Schools and leisure centres** – There is an existing programme with leisure centres. For schools, actions will focus on engagement with Governors, staff, pupils and parents; Enfield will play a more proactive role in identifying the schools needed low carbon retrofit; a schools summit planned for 2021; the Young Mayors led on the design of the strategy.

## **Financing**

We will put more detail in this section and throughout the next iteration.

## **Government lobbying**

We agree and will be including specific lobbying issues for the first two years. These will then be modified, kept or new positions developed at the two year 'root and branch' reviews.