



## Fox Lane and District Residents' Association London N13 & N14

### **Climate Emergency: FLDRAs response to Enfield Council's Climate Action Plan**

FLDRA strongly welcomes this first step in addressing the extremely important issues that confront all of us in relation to man-made climate change. We are concerned to do all that we can to take action to prevent catastrophic climate change and the imminent loss of biodiversity, joined in that action by all fellow citizens, private and state bodies including of course our local authority.

We do not underestimate the challenge, in particular the constraints of time, depleted budgets and limited powers. However Enfield is responsible for more than one million tons of CO<sub>2</sub> emissions and needs to move to at least net zero as soon as possible - and every step, taken as soon as possible, will reduce the carbon loading of the planet going forward.

We now know that we only have a short window of opportunity left to avoid further irreversible damage. But the dreadful Covid19 Pandemic has shown that when we face a lethal threat government and people are capable of finding the money and the will to make things change, fast. What we need now is for government to lead us to act on Climate Change with similar resolve, courage and urgency.

The Draft Climate Action Plan is concerned mostly with the Council's own carbon footprint and intends to move to specific plans, actions and targets to reduce that footprint. We urge that the next step be taken as soon as possible. While it is very good to lead by example, concrete plans for the whole of the Borough need to be rolled out urgently. Time is of the essence, and we need your leadership. We note the comparison with many other London boroughs that already have overarching strategies but also detailed plans to reach their targets.

We welcome the council's commitment to be carbon neutral by 2030 and acknowledge the positive steps that it has already taken. We await an extension of the Action Plan for the whole Borough. FLDRAs will support any initiatives to involve residents in key actions to tackle climate change, such as switching to clean energy and reducing waste. We regard it as also important that the council develops and implements a strong communications strategy with residents, businesses and other stakeholders to raise awareness and provide guidance and advice. We welcome the establishment of the Climate Action Forum, where we are represented, as growing citizen involvement is crucial when 90% of Enfield's emissions come from sources other than the council itself.

#### **1. Travel**

This needs to be a key element of the Action Plan, given that vehicles are responsible for 39% of emissions in the Borough.

Car usage, burning fossil fuels: specific actions are urgently needed to reduce emissions from motor vehicles. As a first step we propose a rapid positioning of 20 mph zones linked to a communication strategy to reduce car use centred on a simple message such as "is your journey really necessary? How can you voluntarily reduce your journeys by 20%? By 50%?".

Electric vehicles: why is Enfield so far behind other authorities in installing electric charging points? Hackney for example has a target of a charging point in every street. It is a given that a large network will encourage take up, so let's see as part of the Local Plan a map showing all the say 500 sites designated for charging points. Enfield residents buy up to perhaps 5,000 cars per year and the incentive needs to be there for a majority to be electric.

Public transport: We believe that public transport must be at the top of the climate action agenda of Enfield and all London authorities, working together with the Department of Transport and Mayor's Office. It is not coincidental that Enfield car usage is higher than in other areas. It has large residential areas with limited public transport infrastructure. To have a realistic chance of rapidly and exponentially increasing the number of people not using cars to go to work, school or shopping, there has to be a cheap, fast and reliable alternative on offer. We support efforts to promote walking and cycling but in most cases the realistic alternative will be public transport. The Action Plan has no information about

what the Authority is aiming to achieve through inter-agency cooperation and does not provide any specifics on the proposed 'new infrastructure' for public transport. What are the targets and when are you aiming to achieve them? Will the new infrastructure include shuttles to mainline and underground stations and schools at peak hours? Will it make cross-borough travel, used particularly by women, the elderly and low-income workers, more effective rather than just north/south commuter routes?

## 2. Buildings

We welcome the ambition to take 100% of council homes to SAP84 by 2030. This is actually a high target. It requires an urgent support plan: how much does it cost to retrofit a typical/various types of properties? How is our programme to be structured? A detailed plan is required urgently. We believe LBE should aim to employ their own specialist retrofitting team, which will require recruitment and training. LBE needs to quantify what 'help from government' will be required, so that they can campaign politically to release adequate funds.

We would like to see a much bolder **local planning policy**. This can be a key regulator of emissions for building and LBE needs planning regulations that are apt at a time of Climate Emergency. There is a legal duty under section 19(1A) of the Planning and Compulsory Purchase Act 2004 to ensure that climate change mitigation and adaptation are core objectives integrated across all local planning policy. There is also a legal obligation under the Strategic Environmental Assessment (SEA) regulations to assess planning policy's consistency with wider climate change objectives.

Given current housebuilding targets in Enfield, a strong planning policy should include all new buildings and retrofits, and not just large developments. We appreciate that central government has not provided strong leadership in this respect, but energy standards in new building regulations are set to increase in the next few years, and local authorities can plan accordingly and start to make a difference.

It has been estimated that approximately 20% of greenhouse gas emissions are embodied in the construction sector. We therefore welcome your interest in embodied carbon. We would like to see specific performance criteria to drive and measure reductions in embodied carbon in new constructions and retrofits. We note that several countries (Germany, Switzerland and others) have already taken action to reduce embodied carbon in construction, either through regulatory policy or strong incentives: The Council could require chain carbon foot-printing from all building projects.

In order to meet the objectives set out under (5) Natural Environment, planning regulations should require a specific percentage of natural green space within any development.

There are many homeowners in Enfield, including the vast majority of properties within the FLDRA area. We would be happy to publicise and promote any guidance and incentives that LBE could issue for private owners on ways to reduce emissions in the home. This links with (4) Energy below.

## 3. Waste

The issue of the proposed North London Waste Authority (NLWA) incinerator is extremely important to many of our members who have been active for many years in the Pinkham Way campaign and to FLDRA. Hardly anyone is convinced by the Council's case for participating in this costly venture, here buried in the description of the incinerator as 'a new energy recovery facility'. There is a perception that residents (who will have to live with the health risks associated with this new plant) are not being given the full picture, and that there is a lack of political courage to reconsider a plan made at a time when decision-makers and residents were not so aware of the climate emergency.

The incinerator plan dates back ten years and has been superseded in its attitude to waste and recycling by the urgent priority to reduce climate gas emissions and changes to 'waste' itself.

The public have not been informed about the potential **health risks** involved in, for example, the emissions of particulate matter. Public Health England data shows that our neighbouring Borough of Waltham Forest (downwind from the incinerator) had the second-worst particulate matter (PM2.5) concentration in England in 2018. It has been reported that the current Edmonton incinerator emits 1.8 billion PM2.5 per second and has been doing this continuously since 1969. There is no equipment to filter PM2.5 and operators are not required to monitor where they land. The World Health Organisation and DEFRA have reported that 'There is no safe level for particulate matter (PM10, PM2.5)'.

If there is any doubt about the **health risks**, we only need to refer to fresh news that particulate pollution increases the mortality of the Corona Virus. ABC News reported on 10 April 2020 that “According to a nationwide study from Harvard T.H. Chan School of Public Health, people with COVID-19 who live in areas with high air pollution levels are more likely to die than those who live in less polluted regions. They found that a small increase -- one microgram per cubic meter -- in long-term exposure to particulate matter leads to a 15% increase in the COVID-19 death rate.

The information supplied by the NLWA about the estimated **carbon footprint** of the plant does not match the data from expert sources. For example, the Intergovernmental Panel on Climate Change states that incinerating 1 tonne of waste generates 0.7 to 1.7 tonnes of CO<sub>2</sub>. Therefore, the new incinerator, designed to burn up to 700,000 tons of waste, would generate about 700,000 of CO<sub>2</sub>. However the figures given by the NLWA are much lower. These discrepancies need to be properly scrutinised. .

It is misleading to say that energy recovered from burning waste is low carbon energy. The 'carbon intensity' of energy produced through waste incineration is more than 23 times greater than that for genuinely low carbon sources such as wind and solar. Similarly, energy recovered from burning waste is by no means entirely “renewable” energy. DEFRA states that “Energy from residual waste is only partially renewable due to the presence of fossil based carbon in the waste, and only the energy contribution from the biogenic portion is counted towards renewable energy targets”. Every household in the NLWA area now has a weekly food waste collection, reducing the biogenic content of our waste

Building such a big plant contradicts and undermines the widely supported and urgent need to achieve large reductions in waste. There is clear evidence that incineration is a disincentive for recycling. There may be declarations of intent about supporting recycling and reuse, but in real life we know that commercial imperatives usually prevail, and incinerators are known to be “waste-hungry”.

**New technologies** are available and constantly developing to maximise separation of recyclable materials, to deal with residual food waste, and, imminently, to recycle more plastics..

A great deal more can be done to **reduce waste and increase reuse and recycling**, which is the most climate-friendly strategy of all. A fraction of the huge £1.2 billion budget could fund effective programmes to work with businesses and consumers to reduce packaging and food waste. There is strong public support for eliminating the production of single use plastics, including the Southgate Low Plastic Waste Zone pioneered by the Council.

Why, then, does Enfield Council still want to saddle the populations of North London, now and in the future, with a waste-hungry and massively expensive venture based on policies and technologies no longer fit for a world facing health crises and a climate catastrophe?

**In the view of FLDR the evasions about the incinerator in the Climate Action Plan are a disgrace. FLDR calls on Enfield Council to withdraw its support for a new incinerator and to invest instead in genuine climate-friendly methodologies. At the very least, Enfield should pause the project and allow an independent evaluation of the cost/benefits in the context of the climate emergency, the emissions likely to be associated with the project, including those embedded in the construction and in all operations, including the transportation of waste to the site from a 50 miles radius, and to provide an up-to-date assessment of alternatives.**

#### **4. Energy**

This section shows the scale of the change that needs to be made to meet net zero carbon. We are delighted that the Council has installed solar panels on the Civic Centre, but we calculate this as a saving of 38.5tCO<sub>2</sub>e per annum, against the current total of a million tons and the 'offsetting' gap of 585tCO<sub>2</sub>e. The 'expected performance' (page 21) of a 2% increase per annum for ten years is wholly inadequate.

There appears to be an excessive reliance on (questionably) “low carbon” energy, presumably energy coming mainly from the so-called “energy recovery facility” planned for Edmonton. We have already noted our concerns that this source of energy does not appear to meet the criteria for the “low carbon” or “renewable” labels, and that the use of this terminology in the context of the incinerator is probably misleading.

We urge the Council to review its targets and include much more ambitious plans for the use of renewable sources of energy, such as solar and wind, in the next ten years, both for the Council

buildings and operations and for the Borough as a whole. In this regard, the Council has created a good resource in the Council-owned company Energetik. We would like to see specific targets for the use of solar and wind energy within this network.

The great majority of domestic property in Enfield is privately owned and we need a communications strategy and a serious drive to reduce home energy use much further. This begins with the steps on p.20 of the Action Plan (fabric and insulation/renewables/heat pumps/decentralised energy/hydrogen) and would cover such matters as what is a heat pump and how does it work; and boiler replacement. Changing the heating system is a big investment for individual households and small businesses, needing preparation and planning over a period of time. The Council could conduct a visible information campaign including advice on grants such as the government's Renewable Heat Incentive (RHI).

## **5. Natural landscape**

FLDRA are working closely with our friends at Friends of Broomfield Park to make explicit the current value of the park and the various activities within it through the lens of a climate emergency, and how to develop the park as a haven of biodiversity, site of carbon capture and place to promote wellbeing. We are aware of the Council's Biodiversity Strategy, not referenced in this report.

We support the idea of tree planting across the borough, by groups and volunteers as well as the Council. We encourage LBE to extend their plans to plant in the Green Belt on council-owned land, as well as elsewhere in Enfield, for example more street trees and miniparks. This is an extremely popular idea with potential access to further funding. It would also be a way to involve large numbers of local people and organisations in climate actions. We will encourage FLDRA members to participate.

## **6. Pension Fund divestment**

"Significantly reducing" the carbon impact of your Pension Funds investments by 2025 seems to us to be a particularly vague target. We understand the Trustees' responsibilities to members, but also note that there are increasing opportunities for "clean" investments and that even large institutions such as the European Investment Bank have decided to stop financing fossil fuel projects. This is one area on which the Council has full control, permitting swift action and the setting of an example for both the corporate and individual pension investor.

## **7. Procurement**

We welcome the Council's aim to update its approach to procurement to ensure that its supply chain is minimising carbon emissions. This is also an area of operations that the Council controls fully and offers an opportunity for swift and decisive action. When will this update take place and what standards will be required of suppliers?

## **8. Influencing others**

We are aware that many of the changes needed to meet the climate change challenge need to come from central government. We urge the Council to take its commitment beyond Enfield to lobby hard for changes to national policies to accelerate action to prevent catastrophic climate change, including

- a National Infrastructure Strategy that reflects climate emergency priorities
- ending UK government financing of fossil fuel projects overseas
- ending subsidies for/progressively taxing fossil fuels, for example the taxing through VAT of aircraft fuel and the reinstatement of the fuel tax escalator for road vehicles