Leeds Climate Change Strategy: a Friends of the Earth response

Climate Change is the biggest environmental threat facing the planet. It requires a radical approach to reduce carbon emissions quickly and urgently. Failure to do so will have a major economic, social and environmental impact on everyone and everywhere. Leeds will be affected in a wide range of ways from increased flooding, heat stress in the city centre, reduced air quality and economic loss.

However, the effect on Leeds will be a shadow of the effect that climate change will have on people elsewhere in the world. Many parts of the more vulnerable parts of the world will be devastated by drought, extreme weather and rising sea levels making large areas of our planet uninhabitable for people.

The city needs a strong vision and strategy for reducing emissions so that we can play our part in avoiding these effects as much as possible.

Friends of the Earth welcomes the publication of a Climate Change Strategy for Leeds but we have concerns that the strategy does not go far enough in the contribution that can be made to the downward trajectory in emissions required by the Climate Change Act and the recommendations of the Committee on Climate Change. This document sets out our comments on the strategy and highlights a number of measures and initiatives that should be undertaken to strengthen the strategy to adequately meet the challenge of climate change.

Targets
The long term target for carbon reduction of an 80% reduction by 2050 is welcome. The scale of the target reflects the scientific evidence detailed by the Committee on Climate Change and the Intergovernmental Panel on Climate Change in their respective reports.

However, there is no recognition in the Climate Change Strategy of the need for many of these reductions to be achieved early in this time period if we are to avoid so-called climate feedback mechanisms such as the melting of permafrost and glacial retreat, changes to the atmospheric vapour content and cloud processes.

Friends of the Earth is disappointed that Leeds City Council stands isolated in the Leeds City Region in not adopting National Indicator 186 into the Local Area Agreement. All other authorities in the City Region have made a range of commitments of between 11.4% and 15% cuts in 2005 emissions by 2011. This shows an appalling lack of leadership from the largest emitting authority in the region.

It is imperative, therefore, that Leeds City Council reflect the target-based approach of central Government and the Committee on Climate Change by setting interim targets of the scale of a 40% reduction by 2020. This approach has been employed by a number of cities in the UK including:

- **Birmingham** – 60% reduction on 1990 CO₂ emissions by 2026.
- **Manchester** – 33% reduction on current emissions by 2020
- **London** – 60% reduction of 1990 emissions by 2025.
The Climate Change Strategy needs to, firstly set a short and medium term target for emission reduction, and then set out how much of these targets each sector and initiative is forecast to contribute to the overall targets. This will enable more effective monitoring of progress and, hence, early corrective action.

Although a robust study of analysing how each sector can contribute to emissions reduction, it is essential that carbon reduction is not compartmentalised but is positioned centrally in the heart of decision making. This will encourage a much more holistic and multidisciplinary approach to carbon reduction.

**Home Energy Efficiency**
The focus of the Climate Change Strategy on energy efficiency is welcomed. It is clear that reducing demand for energy is the most effective means of reducing emissions quickly and it is right that the city council should focus investment on this. Examples of best practice on our doorstep include the initiatives undertaken by Kirklees MBC with the Warm Zones scheme and Sheffield City Council both of which include free installation of insulation and is implemented on a house-by-house, ward-by-ward basis. Sheffield City Council have used the experiences and expertise built up by Kirklees to ensure the effective delivery of these programmes. Friends of the Earth encourages Leeds City Council to adopt this approach and roll out an free insulation and reduced cost efficient heating and microgeneration systems across the city.

**Transport Infrastructure and Demand Management**
Friends of the Earth welcomes the expressed intention to decrease car dependency and encourage use of sustainable modes of travel. However, the section on transport is focussed largely on relieving congestion and building major infrastructure. Leeds City Council needs to recognise that congestion and carbon emissions do not fit hand in glove. The Climate Change Strategy should not focus on congestion in the somewhat vain hope that, by doing so, carbon emissions will reduce.

A modal shift to sustainable modes requires investment in infrastructure to support these sustainable modes as well as promotion to encourage their use. People will not walk or cycle or use public transport if it is not safe, secure and comfortable to do so. Targets for modal shift should be identified. For example, York City Council has set a target of increasing cycling levels by a quarter by 2010.

A thorough assessment of the emissions from the proposals in the Transport for Leeds study must be made prior to developing the bid to Government. It is also alarming that the timescale for the study has positioned public consultation as the last stage of the process. It is essential to get early public consultation to ensure the most appropriate schemes.

The New Generation Transport scheme has already been submitted to the Regional Funding Allocation process and appears to have a positive effect on carbon emissions. An assessment needs to be made of the scope for traffic generation and increased congestion at the proposed Park and Ride sites to ensure the long term success of this project.

A significant omission from the section on transport is the role that certain developments have as traffic and emissions generators. Friends of the Earth welcomes the recent decision by the Plans Panel West to defer the decision on the expansion of Leeds Bradford Airport due to the concerns raised by ourselves on traffic generation ensuing from this.
development. Consideration needs to be made and applied more rigorously on the transport impacts of development proposals to ensure a reduction in car dependency.

The Climate Change Strategy needs to address the impact of increased passenger and flight numbers at Leeds Bradford Airport. Recent analysis from Friends of the Earth showed that the projected growth would result in the emissions from the airport alone exceeding the emissions cap included in the Climate Change Strategy. Leeds City Council should develop policy to constrain the growth of the airport and support initiatives to shift air passengers onto rail.

Partnership Emission Reduction
The development of partnerships to tackle climate change is essential and Leeds City Council’s approach is commended. Collaboration with other local authorities through the City Region network to ensure that future development reduces emissions is also important.

Waste and Resource efficiency
The recognition of role of recycling as a gateway behaviour and maximising emissions reductions through use of best technology is welcomed. The recycling targets in the Integrated Waste Strategy should be strengthened to the scale of the best practice currently seen in some European countries (e.g. 70% recycling in Flanders). Friends of the Earth argue that the maximising of emissions reduction through best technology rules out incineration where, even with the best energy from waste technology, carbon emissions are as high as the gas-fired power stations which make up most the current UK energy mix.

Low Carbon New Developments
Again this section has some positive points but lacks concrete targets and actions. The reflection within the section of the Government house building project seems to be an acceptance of accelerated growth rates rather than analysing the basis for these rates and adapting these to local circumstances. Friends of the Earth encourages Leeds City Council to adopt the Merton Rule whereby provision is made for at least 10% of the projected energy requirements of large developments to be sourced from on-site renewable energy.

Low Carbon Energy Infrastructure
In order to promote the development of renewable energy in Leeds, the strategic site selection for renewable energy needs to be coupled with a presumption in the Local Development Framework in favour of renewable energy schemes and an encouragement for decentralised energy provision.

Developers should be encouraged and be supported to come forward with plans for renewable energy provision through an efficient and effective planning department which couples effective public consultation with an accelerated process.

Friends of the Earth questions the development of the LGI/Leeds University CHP scheme. It is our understanding that this plant relies on the incineration of clinical waste from the hospital site to produce the energy. We need to be ensured that the proposed expansion does not involve the incineration of non-clinical waste that could otherwise be recycled or processed more efficiently.

Adaptation
Friends of the Earth focuses largely on the area of climate mitigation i.e. reduction of emissions but we have a number of comments on adaptation in Leeds. In particular, we are
concerned that the flood defence system in Leeds appears to be overly focussed on major infrastructure such as the flood wall in the Kirkstall Valley rather than the development of sustainable urban drainage, local storage capacity and encouraging the use of grey water systems in domestic and commercial properties.

There is also no mention in the Climate Change Strategy of the use of green infrastructure and the use of green spaces in the city centre as a means of adaptation.

**Information Collation, Coordination and Inspiration**
This section of the Climate Change Strategy covers the important area of public engagement. For public engagement to be effective, the Council needs to be showing real leadership and consistency throughout the range of its activities. This requires the issue of climate change to be at the heart of the Council and for all major decisions to be demonstrably “climate-proofed”.

The early involvement of key stakeholders in major decisions should include environmental/climate change bodies and engage the expertise from a range of academics and policy experts to use their experience to develop robust low carbon policies.

**Moving to a low carbon economy**
As policy development and the economy moves towards a low carbon model, it is essential for local authorities to show leadership in order to capitalise on the many opportunities for sustainable growth and development. Those authorities who show this leadership will benefit from a “first-mover” advantage and will attract businesses that have embraced this new model.

If Leeds fails to adopt challenging targets and does not implement the initiatives highlighted in this document then it will **fall behind its more progressive rivals**. This will lead to the local economy being slower to recover from the present economic climate and suffering on a long-term basis from falling behind these rivals e.g. Manchester, Sheffield.

**Monitoring and Review**
Many of the measures set out in the Climate Change Strategy are very laudable and Friends of the Earth will be the first to congratulate the council for effective delivery. However, the strategy needs to both start looking immediately at what measures are appropriate for the decade beyond 2011 and to ensure that effective annual monitoring is implemented so that effective corrective action can be taken should the measures implemented fail to achieve the emissions reductions anticipated.

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