Response from Nottingham Friends of the Earth to Carbon Neutral Nottingham 2020 - 2028 Draft Plan

1. We welcome the lead taken by Nottingham City Council in consulting on the CN2028 Action Plan. We broadly support the list of Actions set out in the Draft Plan.

2. We are concerned at the lack of urgency. The CN2028 target was declared in January 2019. Consultation was not launched until January 2020. It seems unlikely that there will be a costed strategy in place before January 2021.

3. The section of the Draft Plan headed Governance, Funding & Engagement has not been included in the consultation survey. Under Monitoring, it states (p13) that progress towards the carbon neutral pledge "including annual milestones and the carbon neutral pathway targets, will be reported quarterly as part of the Council's corporate reporting." We would like to see rapid progress towards setting the necessary annual milestones which can be monitored.

4. Initially it will be implementation of the various Actions which need to be monitored. It will be helpful to quickly identify, for each Action in the Plan, a timetable for implementation and who will be responsible. We would expect to see progress against the timetable to be monitored quarterly and reviewed in detail annually. Both outputs in terms of Actions and outcomes in terms of tonnes of CO2 avoided should be included in Monitoring Reports.

5. It would also be helpful to estimate the likely contribution to carbon reduction which would be expected annually from each Action, and also any required budget allocation. This should then inform a process of prioritisation (which so far seems to be missing in the Plan). The City Council (and other organisations) will then need to be clear about the allocation of funding and officer time.

6. Initially it would be helpful to identify Actions which can be taken in the next year (say to March 2021). Many of these will be about planning future Actions and securing necessary funding. That will help to ensure that the strategy can at least get going seriously from April 2021.

7. In the past, there has been a tendency to pursue good ideas for a short time, but then to move on to other things and allow previous initiatives to be forgotten. For example, in October 2006 the City Council adopted a Climate Protection Strategy to become a "carbon neutral council within 10 years".[1] Although this did lead to a well managed Carbon Management Plan which did reduce the council's carbon emissions by more than its 30% target, the intention to become carbon neutral was quietly forgotten. We would hope that CN2028 will be pursued as long as it takes for the city to become carbon neutral.

[1] The Climate Protection Strategy was adopted by the City Council on 9 October 2006 – Item 4, Appendix A: https://committee.nottinghamcity.gov.uk/Data/City%20Council/20061009/Agenda/CLIMATECHANGEAPPENDIXA%20-%2024571.pdf

8. We broadly support the Action Plan as a whole. The following comments focus on some of the points we would like to see pursued as priorities.

Governance, Funding & Engagement

9. We agree that the City Council and other organisations should develop a 'carbon neutral by design' ethos – where everything that is proposed or implemented considers how it can be carbon neutral or contribute to reducing carbon.

Transport

10. We agree that reducing the need to travel is the most important ongoing priority (1.1) with particular reference to the Local Plan (1.1.3). It is clear that reducing vehicle miles should be made a priority, with a particular focus on single occupancy car commuting.

11. A second priority is the uptake of active travel (1.2) with particular reference to a Local Cycling and Walking Infrastructure Plan (LCWIP) (1.2.1).

12. Thirdly, we support improving quality, accessibility and frequency of public transport for all (1.3).

13. We also support a shift to electric vehicles, including electric bikes, and expanding the charging network (1.6). It will be important for private sector involvement, for example workplace and supermarket parking.

14. We would like to see more urgency in implementing a City Centre Clear Zone to keep out the most polluting vehicles (1.4.2).

15. In the medium term, we would like to see consideration of road user charging (1.5.1) to help reallocate road space to the most sustainable forms of travel. Some of the suggested actions, including emissions-based parking tariffs, could be implemented more quickly.

Built environment

16. The most important priority should be a programme to bring all homes and business premises upto the highest energy efficiency standards (2.3 & 2.2) with particular emphasis on eliminating fuel poverty (2.4.1).

17. All new build should be zero carbon (at least Passivhaus standard) which should be specified in any Carbon Neutral Supplementary Planning Document (2.2.3). Buildings should also be 'climate adapted' to provide protection against heatwaves and floods (7.1.1).

18. We should also be planning to implement a programme of converting heating systems from gas or other fossil fuels to heat pumps (2.1.2).

19. A specific policy should be included to increase the planting of urban trees and shrubs. (The Woodland Trust have asked for a minimum 30% tree canopy cover on all development land.[2]) Trees and shrubs can help to provide cooling in summer and to reduce air pollution. They can also play a part in Sustainable Urban Drainage Systems to reduce run-off and flood-risk.

Energy Generation

20. We agree that the priority should be to increase local low carbon sources of energy (3.2) and improve the capacity to store energy (3.3).

21. It should be noted that "Energy-from-Waste" provided by Eastcroft Incinerator is not low carbon. In 2019 the incinerator burnt 188,242 tonnes of waste. Assuming the composition was similar to when a waste audit was carried out in 2014, which found waste delivered to the incinerator to contain 23.66% carbon, we can calculate that around 160,000 tonnes CO2 will have been emitted in 2019. Taking account of the electricity and heat actually sold by Enviroenergy, carbon emissions are probably worse than for a coal-fired power station.[3]

22. We would also question the statement in the Action Plan (p05) that "The city is also on track to meet the target of generating 20% of the City's energy demand through low and zero carbon sources by 2020." When a similar claim was made in 2013, it became apparent that most of the 'low carbon' energy claimed was from gas CHP – lower than for grid electricity but well above the carbon intensity of 50g CO2/kWh recommended as a limit by the Committee on Climate Change.[4]

Waste & Water

23. We agree that reducing waste should be the main priority (4.1). The emphasis should then be on repair and reuse (4.1.3) and producer responsibility to support a circular economy approach.

24. Waste collection should be source-separated for both homes and businesses to preserve the value of recyclate (4.2.4). We support separate collection of food waste for anaerobic digestion (4.2.1). Nottingham City's current performance of 26.5% of household waste reused, recycled or composted is clearly unacceptable (and in the bottom 25% of authorities). The City should at least aim for the minimum targets set by the EU Circular Economy plan: 55% recycling by 2025 and 65% by 2035.

25. We agree with the emphasis on reducing water demand (4.5) and improving efficiency of water use, including use of grey water systems (4.4).

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[2] Emergency Tree Plan: https://www.woodlandtrust.org.uk/publications/2020/01/emergency-tree-plan/

[3] See https://nottfoe.gn.apc.org/oldfoe/200Eastcroft.html

[4] See https://nottfoe.gn.apc.org/oldfoe/667NottinghamEnergyStatistics.html

Consumption

26. We agree with an emphasis on reducing consumption, buying sustainably and making best use of existing resources (5.7), i.e. “make do and mend”.

27. We also agree with reducing consumption of food associated with high carbon emissions (5.2), especially the need to cut consumption of red meat and dairy.

Production

28. One omission in the Action Plan is a section on Production. Priority should be given to design of products for low-carbon production and use – including design for repair and reuse.

Carbon Offsetting

29. We support improvements in land management to better retain carbon – e.g. soil management, biodiversity and tree planting (6.3)

30. However, the scope of offsetting should not be overstated. The City Council has an existing policy (Urban Forest Strategy) to increase tree canopy cover from 14% to 20% by 2030. This increase of 6% will need to cover around 450 hectares (4.5 million square metres). This would require say 1 million trees each with a canopy of 4.5 square metres (i.e. 2.4 metres diameter) – i.e. mature or semi-mature trees, depending on species. Estimating absorption of carbon by trees requires a complex calculation depending on species and location, but one rough estimate is that one tree may absorb the equivalent of one tonne of CO2 over 40 years, an average of 25kg per year though probably nearer 10kg in early years. So one million trees might absorb 10,000 tonnes CO2 per year initially, rising to 25,000 tonnes – around 1% to 2.5% of Nottingham’s current CO2 emissions.

Resilience & Adaptation

31. We agree that a full citywide vulnerability assessment should be undertaken for extreme weather events and climate change with particular consideration for the most vulnerable citizens (7.4). This should then be incorporated into relevant policies (7.1).

10 March 2020