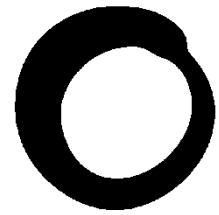


**GET
SERIOUS
ABOUT
CO2**



**Friends of
the Earth**

Consultation

**Benchmarking local authority best practice
on tackling climate change:**

- **Climate Change Strategies**
- **Measuring carbon, and technical
feasibility assessments for emissions
cuts locally**

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1. Introduction

Friends of the Earth's **Get Serious About CO₂ campaign** is for every council to do its bit to tackle climate change.

Emissions from local activities – like how we heat and power buildings and how we travel – amount to around 80 per cent of the UK's total climate pollution. Local authorities can have a critical influence on many aspects of these emissions, either through direct service provision, or through enabling local residents and stakeholders to take action.

Many local authorities are leading pioneering and inspiring work in tackling climate change. Friends of the Earth local groups have been working with their local authorities to ask them to make tackling climate change a core part of what they do. The result is councils around the country – including those led by all the main political parties, covering both urban and rural areas – have passed motions and are implementing strategies to cut emissions in their area by at least 40 per cent by 2020.

This shows that ambitious action locally – in line with the scientific evidence of what is needed to do our bit to tackle climate change – is both politically and practically possible. But too many are being left behind. Every local authority will need to do its bit if we are to meet our commitments in the Climate Change Act.

Friends of the Earth is leading the campaign for Local Carbon Budgets – to cap emissions in every local authority area and to ensure that each area is covered by a climate change strategy. All major parties now back a form of local carbon budget, and Friends of the Earth will be pushing for new legislation to introduce them for all local authorities during the next parliament.

For this legislation to be effective it must:

- Empower local authorities to lead the task of creating the low-carbon transition locally
- Set carbon budgets that are both realistic and ambitious
- Be informed by leaders in local authorities and experts in carbon reduction

This consultation is to help Friends of the Earth develop appropriate legislation. The consultation will be in two parts:

1. Consultation about statutory guidance on:
 - Climate change strategies
 - Technical feasibility studies on the potential to cut CO₂ locally
2. Consultation on the detail of the primary legislation. This will happen in separate discussions alongside this written communication. For information, the outline of the proposed legislation is set out in Appendix 1.

Friends of the Earth are keen to have your input into this process. We look forward to hearing from you.

2. Friends of the Earth consultation aims and process

2.1 Consultation aim

The aim of this consultation is to help draw up proposals for statutory guidance on:

- The form and content of climate change strategies
- The form of technical feasibility assessments and measurement of CO₂ emissions

The guidance will be in the form of benchmarks against which performance can be measured. Draft benchmarks are set out in section 3 below.

When commenting on the draft benchmarks, we would like you to consider the following:

| Benchmarks aims | Consultation questions |
|---|--|
| The fewest needed to ensure best practice | Are the suggested benchmarks the right ones? Should others be added? |
| Relevant to all types of local authority or group of local authorities | Can the benchmarks be applied to all circumstances? What are the factors that should be taken into consideration? |
| Allow flexibility where possible – to allow best practice to develop and local circumstances to be reflected. | Do these benchmark proposals allow for developing best practice? What extra flexibility could be added without making them too weak to be meaningful or measurable? |
| SMART – specific, measurable, agreed upon, realistic and time-based | The more specific the ‘specific’ benchmarks, the more they can be measured and achieve something. This is the area that Friends of the Earth thinks needs to be strengthened most. |

2.3 Consultation process

Please send responses to quentin.given@foe.co.uk by 6pm 14 May 2010.

3. Draft Benchmarks

3.1 Climate change strategies

Climate change strategies and delivery plans are a central tool for planning and delivering the emissions cuts needed locally. They provide a focus to the organisation about the task ahead, enable resources to be allocated appropriately, and provide a benchmark against which council tax payers can measure delivery.

Every local authority will either have to have its own strategy, or be covered by a strategy in a partnership with neighbouring local authorities.

There is currently no best practice standard for climate change strategies. Whilst every local authority strategy will look different – and the point is that each is tailored to the local circumstances – we are seeking to identify key elements that all good climate change strategies will include.

Please comment on the below suggestions.

| Benchmark | Specific | Measurable | Agreed upon | Realistic | Time |
|--------------------|--|--|---|---|---|
| 1. Vision | The strategy should express a vision for a low-carbon future for the area. | It should describe broadly what will be different about the area and local people's lives by the end of the strategy | There must be consultation with local people about the vision. | It must be achievable. | It must be achievable during the course of the carbon budget periods covered. |
| 2. Ambition | The strategy should state the scale of emissions cuts that have been committed to in the area for each carbon budget period. | It must reflect the demands of climate science for emissions cuts and local circumstances | It must have been agreed in consultation with national government | It should be benchmarked against current best practice, or extrapolation from this. | There should be annual indicative ranges – identifying aims for emissions cuts within each carbon |

| | | | | | budget period |
|---|---|---|---|--|--|
| 3. Scope for cuts in each sector | <p>The strategy should identify policies to cut emissions:</p> <ul style="list-style-type: none"> • Transport • Gas and electricity use in domestic, commercial, and public buildings • Other energy use eg street lighting • Energy generation | <p>It must have estimates for emissions reductions in each sector. The net emissions cut must add up to the sum of the emissions cuts committed to.</p> | <p>There must have been local consultation on policies</p> | <p>The policies identified must be likely to deliver the emissions cuts identified.</p> <p>They must be achievable, as evidenced in reference to current best practice or extrapolation from this.</p> | <p>It must be possible to implement the policies within the budget period identified . Intermediate emissions goals must be identified to meet annual indicative ranges.</p> |
| 4. Measurement and reporting | <p>The strategy should set out how emissions will be measured in the local area, and how and when they will be reported to national government and local people.</p> | <p>It must measure the trajectory of all emissions in the area, not just emissions cuts from green projects.</p> | <p>Nationally agreed measurement standards should be used.</p> | <p>Reporting on the carbon budget and strategy should be incorporated into the local authority's annual report and financial budget plans</p> | <p>Reporting should be in time for the Secretary of State and the CCC to evaluate progress towards meeting national carbon budgets.</p> |
| 5. Costs and sources of money | <p>The strategy should set out broadly how much money it will cost to implement and where the money will come</p> | | <p>There must be agreement between the local authority, national government</p> | <p>The estimated costs must be based upon best practice, or for new initiatives based on a modelled</p> | <p>The funding must be secured in time to meet the carbon budgets</p> |

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| | from. | | and local partners about funding the policies in the strategy. | evidence base. There must be agreement from the funders. | and indicative annual ranges. |
| 6. Responsibility | The strategy should set out the division of responsibility between local and national government for meeting the local carbon budget. It should set out local partnerships – including with the public and private sector. It should identify which elected officer takes lead responsibility for the local carbon budget to be met, and the lead officer(s) | The strategy should list policies that will be delivered by each party. It will name positions holding responsibility. | The division of responsibility will be agreed between local and national government | The policies should be fairly attributed between local and national government? Risks of perverse consequences of splitting responsibility should be identified and mitigated against. | Clear delivery paths should be set out to ensure each delivers on their responsibility. |
| 7. Community engagement | The strategy should set out who will be consulted on the policies to cut emissions locally, what form the consultation will take place and at what stages of the process. | <p>Form: A standing panel or panels of representatives? Community meetings?</p> <p>Consultees: Local residents: ▪ Include under-represented groups Local</p> | The consultation should fit with nationally set out guidance and local needs (see section 4.2) | | The timetable should be scheduled to enable genuine input into the strategy formation |

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| | | <p>businesses:</p> <ul style="list-style-type: none"> ▪ Include big and small businesses <p>Public sector authorities include:</p> <ul style="list-style-type: none"> ▪ Health ▪ Education ▪ Social Services <p>Parish councils?</p> <p>Neighbouring local authorities?</p> | | | |
| 8. Impacts assessment | The strategy should set out what the expected impacts of the policies will be for local residents, the public sector, local businesses, other stakeholders, the natural environment, and the national effort to cut CO ₂ emissions. | | | | It should be specific about when the impacts are expected |
| 9. Integration | The strategy should set out how cutting carbon will be integrated with all other decisions of the local authority including: budget | | Agreement will be needed with leaders of other local authority strategies. | | |

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|----------------------------|---|--|---|--|--|
| | decisions, planning policy, climate change adaptation, waste reduction, and other local authority aims and strategies. | | | | |
| 10. Delivery | The strategy should set out the process by which plans will be enacted to deliver the strategy. | This should include designating responsibility for delivery (as above) and clear internal Key Performance Indicators | | Existing delivery plans should cover the aims of the strategy or be amended, or new ones be recorded. | The plans must deliver the cuts within the budget period and indicative ranges identified |
| 11. Future proofing | The strategy should set out the process for researching and amending the strategy based on: <ul style="list-style-type: none"> • future local carbon budget ambition. • A future need to measure and reduce emissions from embedded carbon. | The strategy should place immediate plans in the contexts of the longer term aim out to 2050. | There should be discussion with national government and other stakeholders like Friends of the Earth on future issues like embedded carbon. | As climate change policy is a rapidly developing area, assessing likely change and how to respond to it is a prudent action. | The strategy should set out a broad expected timetable for incorporating future developments into the strategy – like embedded carbon. |

3.3 The form of technical feasibility assessments and measurement of CO₂ emissions

| Benchmark | Specific | Measurable | Agreed upon | Realistic | Time |
|--|--|------------|-------------|-----------|------|
| Technical feasibility assessments | Measure all potential for reducing emissions in the area including: | | | | |
| | <p>Heat mapping Map areas of existing heat demand, and density. Identify existing and potential future anchor loads for district heating networks. Identify proposed future developments for potential to introduce district heating networks.</p> <p>Map existing thermal generation, including in neighbouring LA areas, calculate current heat wastage, and identify options for use of heat.</p> <p>Wind Assess local wind resource, including wind speeds and constraints such as proximity to buildings, existence of AONBs, wildlife protection</p> | | | | |

| | | | | | |
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| | <p>designations etc. Assessment should include identifying opportunities for on-site generation.</p> <p>Electricity distribution Map electricity transmission and distribution network, and existing capacity, to identify network constraints.</p> <p>Renewables Identify total roofspace available for PV and/or solar thermal.</p> <p>Assess availability of local renewable waste: food waste, sewage, and slurries, for anaerobic digestion.</p> <p>Identify best strategic use, ie injection into gas grid, or onsite heat, or heat and power production.</p> <p>Identify scale and location of clean waste wood resource for use wood-burning plant.</p> <p>NB. Incineration of fossil fuel derived</p> | | | | |
|--|--|--|--|--|--|

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|--|--|--|--|---|--|
| | <p>municipal and commercial waste is not renewable.</p> <p>Biomass Identify existing and potential future biomass arboricultural waste.</p> <p>Map local woodland and assess potential for sustainable management and wood fuel extraction.</p> <p>Identify potential resource: geothermal; GSHP; ASHP; hydro; tidal; wave.</p> <p>Potential for renewables and CHP</p> | | | | |
| | <p>Energy efficiency of buildings</p> <p>An accurate measurement of the current energy efficiency of all properties (domestic and non-domestic) and assessment of the measures required to make them energy efficient.</p> | <p>EPC data from properties when they are sold or let.</p> <p>Tenure information of all properties through small scale surveys</p> | <p>Local authorities do not yet have access to the data.</p> | <p>It will take a considerable length of time for all properties to acquire an EPC (ie some aren't sold for many years).</p> <p>There are high levels of non-compliance in the non-domestic sector (and potentially in the domestic sector once</p> | |

| | | | | | |
|--|---|--|-------------------------|---|--|
| | | | | HIPs are abolished) | |
| | <p>Transport</p> <p>Measure car use in the area.</p> <p>Identify opportunities for other transport to be used or low carbon vehicles to be used.</p> <p>Reduction in car traffic</p> <p>Take up of low carbon vehicles</p> <p>Proportion of local journeys done by cycling / walking</p> <p>▪ What else?</p> | | | | |
| Measurement of CO₂ emissions | Traffic emissions | DVLA data and traffic surveys | | | |
| | Energy use | Address-level data from energy providers and liquid fuel suppliers | Need access to the data | Likely for government to make this change | |

4. Further information

Friends of the Earth has produced a range of resources to support the campaign. They are available at our website www.foe.co.uk.

Friends of the Earth briefings include:

- Get Serious About CO2 [campaign introduction](#)
- [Local Carbon Budgets](#)

For further information, please contact Liz Hutchins, Friends of the Earth campaigner

Direct line: 020 7566 1728 | Mobile: 07957 145996 | Switchboard 020 7490 1555

Email: liz.hutchins@foe.co.uk | Web: www.foe.co.uk

Appendix 1: Legislation on Local Carbon Budgets

Friends of the Earth will be campaigning for legislation to introduce local carbon budgets during the next parliament.

We are interested in your views and want to take them on board as we develop the legislation. We will be in touch separately from this communication to ask for your input. For your information, below is an outline of the legislation we are developing.

Primary legislation

- Introduce local carbon budgets – a cap on emissions in each local authority area, set in line with the science and local circumstances. This is laid out more fully in the Friends of the Earth Local Carbon Budgets Briefing [here](#).
- Require local authorities to undertake a technical feasibility study of emissions cuts potential in their area.
- Require local authorities and national government to agree a strategy and delivery plan to meet the budget
- Require local authorities and national government to carry out the strategy and delivery plan
- Introduce reporting and adjusting of the strategies if they are not on track to meet the local carbon budgets (similar to the Climate Change Act process)
- Require consultation locally on the content of the strategy
- Enable functions to be conferred to local authorities if it agreed with national government they can deliver the emissions cuts better; and enable local authorities to request new functions
- Require government to provide resources to enable the local carbon budgets to be met
- Link to the national Climate Change Act – local carbon budgets flow from the national carbon budgets.

Secondary legislation

Some important elements of the legislation will be introduced as statutory guidance. This is to minimise deterministic elements in the bill, and to give more flexibility for lessons from Local Carbon Framework pilots and leading local authorities to be incorporated into guidance.

It will include:

- The form and content of climate change strategies including public consultation
- The form of technical feasibility assessments of emissions cuts potential locally