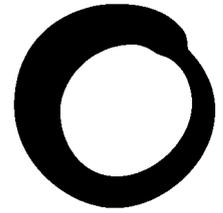


March 2009



**Friends of  
the Earth**

# Briefing

# Yorkshire and Humber Climate Change Plan

**A Friends of the Earth analysis**

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## **Yorkshire and Humber Climate Change Plan**

Friends of the Earth is a member of the Climate Change Partnership for the region and has been actively engaged in the development of the Climate Change Plan. As the voluntary sector organisation that originally designed and promoted the national legislation based emissions reduction framework that is about to be put in place by the Climate Change Act, we believe we are able to make an effective contribution to the design of the regional frameworks that now need to be put in place to implement the requirements of the Act in the England's regions.

We welcome the development of a Climate Change Plan as an essential part in tackling the urgent problem of increasing carbon concentrations in the atmosphere and the growing evidence of the need for rapid and drastic cuts in greenhouse gas emissions.

### **However, the Climate Change Plan is fundamentally weak in key aspects:**

- a) It does not attempt to quantify the emissions reductions that it seeks to achieve through the identified interventions.
- b) As such, it does not show how it bridges the identified gap in the greenhouse gas reduction targets in regional strategies and the policies being pursued by key bodies in the region.
- c) It does not reflect the need for a carbon budget in line with the national budgets established under the Climate Change Act.
- d) It fails to draw on the full range of the vast expertise on climate change in the region, merely on the bodies charged with policy delivery. This prevents the plan from identifying the best interventions.
- e) It does not set a sufficient framework for reviewing progress towards regional targets at a time when addressing failure to make necessary progress could be critical.

As the policy framework under the Climate Change Act takes its time to embed itself and scale down to the regional tier with changes to targets and provisions, the revised Climate Change Plan should only be an *interim* measure, lasting no longer than 1 year, in order that the type and scale of actions it proposes can be made consistent with the requirements of the Act.

During this year to December 2009, the 'shadow' Climate Change Plan can be developed and also consulted on thoroughly to establish its fitness for purpose. We recommend this because it is not possible to publish a credible Climate Change Plan intended to cover the five year period to 2013 before the scale of the challenge to which it has to respond has been established, and *how* regional action is best able to contribute to a national framework, is properly identified.

### **Introduction**

Climate change is the gravest environmental threat facing the planet. The effects of climate

change will be global and will manifest themselves with severe economic, social and environmental implications if climate change is not addressed at all levels of Government and across all sectors of the economy.

The Yorkshire and Humber region will feel the effects of climate change through increased frequency of extreme weather events, loss of habitats and resilience and greater economic impacts. It must therefore also be addressed at the regional level - within a national framework - and that is the purpose of this Climate Change Plan.

The UK Government has played a significant role in highlighting the problem on an international stage and has stated its intention to take action to tackle climate change. The Climate Change Act provides that national framework and is a world-leading robust piece of legislation which requires the Government to:

- Establish an independent Committee on Climate Change to report to Government on progress towards targets and recommendations for actions to achieve the targets.
- Set five year carbon budgets across all sectors (including taking into account emissions from international aviation and shipping) to ensure that the UK maintains a pathway to a now increased target of an 80% reduction in carbon emissions by 2050. The first carbon budget period covers the period 2008-12, which therefore coincides with the period of the Climate Change Plan. The Committee on Climate Change has recommended cuts in greenhouse gases of up to 42% (on 1990 levels) by 2020.
- Reporting annually on progress towards targets

At the European level, in March 2007 the UK Government agreed with other member states to reduce greenhouse gas emissions by up to 30% by 2020 (on 1990 levels).

The Treasury-commissioned Stern Review<sup>i</sup> stated that the long term economic impact of failing to act on climate change would far outweigh the costs of taking action. Stern recommended four strands of action for tackling climate change, namely:

- Reducing demand for emissions-intensive goods and services
- Increased efficiency, which can save both money and emissions
- Action on non-energy emissions, such as avoiding deforestation
- Switching to lower-carbon technologies for power, heat and transport

These conclusions on economic impact were confirmed by the interim report of the Climate Change Committee.

Since the publication of the Stern Report, the Intergovernmental Panel on Climate Change (IPCC) has published its most recent Summary for Policy Makers<sup>ii</sup>. This document strengthens the evidence for man-made climate change and stresses that the problem is becoming more severe than previously thought and that, consequently, action is required

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urgently. The IPCC report recommended mitigation measures including the implementation of renewable energy sources and stated that

“Delayed emission reductions significantly constrain the opportunities to achieve lower stabilisation levels and increase the risk of more severe climate change impacts.”

This urgency is underlined by a September 2008 report from the Tyndall Centre for Climate Change Research<sup>iii</sup> which identifies the increased severity of the future cuts in emissions that will be required given first the actual emissions in the 2000-6 period and then as a result of continued forecast growth to around 2012. This report demonstrates that there is a policy priority therefore to stop and reverse that continued growth in emissions from now to 2015 if we are to reduce the slope of the subsequent emissions reduction trajectory in order to have a reasonable chance of successfully restricting the growth in average global temperature to the “safe” level of 2°C.

Secondly, the Tyndall Centre analysis places a policy premium on immediate demand management and demand reduction measures, rather than measures for increases to sustainable energy generation, because the latter will take a longer timescale to be implemented and have an effect on the trajectory and on cumulative emissions.

Lastly, the Government has proposed the promotion of the inclusion of National Indicator 186 within Local Area Agreements established by local authorities and Local Strategic Partnerships. This is important precisely because it has established internally consistent and challenging emissions reduction targets (within the range 10-15%) covering an LA area and within the period 2008-11.

The NI 186 indicator has already been adopted by more than 70% of LAs nationally, and the majority in this region - although with some notable exceptions, including Hull and Leeds. The NI186 approach should be mandatory on all local authorities, rather than voluntary.

It is within this context, therefore, that Friends of the Earth has considered the proposals of the draft regional Climate Change Plan. The Climate Change Plan must:

- Support the adoption of a range of mitigation measures that can be delivered effectively as a matter of great urgency.
- Contain proposals that are effective in the period to 2013 with a strong emphasis on demand management and reduction, including emissions from international aviation and shipping.
- Reflect the quality of the NI 186 mechanism by setting actual targeted reduction measures within the Climate Change Plan period and that identified by the Tyndall Centre report.

### The Climate Change Plan to date

It is welcome that the region has a Climate Change Plan and that many of the regional bodies have embraced the challenge of climate change in policy making areas.

However, the 2005 version of the CCAP has failed to deliver significant carbon reductions. The reasons for this are:

- The 30+ actions identified were largely oblique and secondary to the task of delivering actual emissions reductions. In other words the original design of the measures was quite unlikely to deliver the intended outcome. Critically, the essential outcome - that the Action Plan should contribute to the quantified regional emissions reduction target established in adopted RSS 2004 - was not identified as the driver for all its individual measures [of the 2005 Action Plan]. This would have required the setting of allocated targets – e.g. to policy or sector areas of emissions - required to be achieved.
- The current revision process does not appear to have included a review of the effectiveness of the 2005 Action Plan, to establish particularly and on a quantified basis the extent to which any of its measures (i) have either been achieved or not; and (ii) whether they have resulted in quantified emissions reductions. A Friends of the Earth assessment of performance against the 30+ actions indicates that, even if some might have been delivered to some extent, there is no evidence that the Action Plan has resulted in emissions reductions. Many of the important actions on monitoring and reviewing the 2005 Action Plan have not been effectively implemented.
- The achievement since 2005 of what measures have actually been undertaken to secure climate change reduction - including the retention of the regional climate change reduction target in adopted RSS 2008 and the development of the *Yorkshire Forward* Carbon Capture and Storage feasibility study - have not taken place as a result of the Action Plan, but independently of it.
- A series of analytical reports undertaken for the Regional Assembly by the *Stockholm Environmental Institute* have also identified likely major failure in achieving the regional reduction target - indeed that policy measures were actually encouraging emissions increases - and that this is as a result of institutional and policy shortfalls which need to be corrected.
- Whilst the CCAP has been in the public domain and in the policy framework, some carbon-intensive developments have been allowed to proceed thus reducing the potential impact of the CCAP. The Climate Change Plan needs to have the teeth to influence these decisions.

Whilst, there has been no analysis of the success or failure of the 2005 Action Plan it is clear from the above that the first Action Plan did not work to any extent at all in terms of measurable emissions reduction, and in comparison to the scale of the challenge it confronted. The revised Climate Change Plan has to recognise this starting point and

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proceed with a different approach that does not repeat these weaknesses. As the scientific evidence on climate change shows that the problems and impacts are becoming ever more urgent, **it is absolutely essential that the Climate Change Plan for 2008-2013 delivers significant carbon reductions commensurate with the targets set in the Regional Spatial Strategy and in the Climate Change Act.**

In view of the seriousness of the climate change science and the critical nature of early emissions reductions the measures in the revised Climate Change Plan and the effectiveness of delivery needs to be monumentally improved from the 2005 plan, because by the time its weaknesses came to be revealed for the second time, it will be too late.

### **Connecting the National and Regional Frameworks**

As noted above, the Climate Change Act is a world-class piece of legislation which commits the UK Government to achieving an 80% reduction in carbon dioxide emissions by 2050 through the achievement of a series of five year carbon budgets. These budgets and progress towards them will be reviewed by an independent Committee on Climate Change to ensure that this reduction pathway is maintained.

The framework provided by the Climate Change Act was originally designed and proposed by Friends of the Earth, and advocated to the Government, and to all political parties - who then came to support it. Furthermore, it has been recognized by many Members of Parliament that, in its passage through Parliament, Friends of the Earth has been instrumental in ensuring that this legislation is sufficiently robust to reflect the scientific evidence on climate change.

The Climate Change Act does not itself identify a specific or statutory approach to **regional** climate change reduction although Amendment 126<sup>iv</sup> to the Planning Bill is helpful to an extent. However, there is a clear advantage in ensuring that regional policy and delivery complements the commitments and spirit of the Act.

**Support for implementing the requirements of the Climate Change Act and the work of the Government's Department of Energy & Climate Change (DECC) must be central to the purpose and structure of the Climate Change Plan.**

Our view is that we would like to see the strengths and structures of the Climate Change Act replicated in the regional framework.

At the moment the Regional Spatial Strategy only sets a target for a reduction in greenhouse gas emissions of between 20% and 25% by 2015. We note that this establishment of a target for GHGs rather than CO<sub>2</sub> - where the Y&H RSS was previously anomalous - is now consistent with the Climate Change Bill. However, given the scale of the cuts (of up to 42%) recommended by the Committee on Climate Change, it is inevitable that the extent of the regional target through the Single Integrated Regional Strategy, and the timescale by which intermediary targets have to be met, will now have to be revised in order to comply with the Act.

**Therefore as a very first action, the Climate Change Plan must establish the process - at the national level, so that this is consistent with all other regions - by which a revised regional climate change reduction target and carbon budgets can be quantified and incorporated firmly in the Single Integrated Regional Strategy.**

The Climate Change Plan then needs to ensure delivery of these regional and national targets. To do this, we recommend embracing the strengths of the Climate Change Act in the region, namely:

- There should be a climate change reduction target and carbon budgets set for the region which reflects those set at a national level. Specifically, they should be five year budgets with the budgets for the first three periods (2008-12, 2013-2017 and 2018-22).

These targets and carbon budgets will need to be identified between the regional authorities and national departments (we would assume Department for Communities and Local Government in consultation with the new Department of Energy and Climate Change), and then adopted regionally as soon as possible.

- There should be an annual report on progress towards the carbon budget. This could form part of the Progress in the Region report published annually by *Yorkshire Futures*. This report would be submitted to Government as a formal indication of regional commitment to delivering 'our share' of national reduction targets and carbon budgets.
- The equivalent of the independent Committee on Climate Change should be established in order to provide advice and scrutiny in relation to the progress being made and actions being taken towards target achievement. Its role should be developed out of the work of the Regional Sustainability Board and the Climate Change Partnership, acting on the independent advice of Yorkshire Futures, with however the work of that Board being supplemented by the involvement of other stakeholders and experts. Its annual review should contribute to the annual report above, and should be undertaken transparently and in public.

This 'Regional Climate Committee' should be tasked with:

- i. Receiving and scrutinising the regional climate change target and carbon budgets as established, and identifying particular issues consequently requiring particular attention;
- ii. Ensuring that the mechanisms for the regional monitoring and forecasting of emissions is adequate and properly resourced;
- iii. Advising on sectoral and sub regional allocations of targets and carbon budgets

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- iv. Advising the regional and local authorities and organisations on progress towards achieving targets/ carbon budgets, and up-to-date forecasts of the future emissions reduction trajectory that will be required.
- v. Advising where regional policy and programmes are inconsistent with targets/carbon budget, and where particular remedial action needs to be undertaken;
- vi. Convening the annual review of regional climate change progress as a public and transparent process; and,
- vii. Preparing and publicising an authoritative statement of regional progress on climate change reduction and particular areas where further action is required.

### **A sectoral approach**

Friends of the Earth welcome the sectoral approach in the Climate Change Plan for 2008-13. This approach enables key responsibility and accountability to be apportioned to all the principal emissions sectors, and to different bodies dependent on the source of emissions. This is an essential first step.

However, having taken that initial step, the Climate Change Plan then appears to falter. The first requirement for each sector is to identify the emissions proportion it is responsible for, and the forecast emissions trajectory for the sector. It then needs to require a detailed analysis about what scale of emissions reduction is achievable from each sector and then whether the actions detailed are capable of delivering these reductions. This analysis must be quantified, and supported by modeling. Then the Climate Change Plan needs to identify the institutional and delivery partner arrangements and structures that will have to be responsible for implementing sector reductions.

As an example, the increased emphasis within the Sub National Review of sub-regional and local authority activity (rather than regionally led) will probably make the process of implementation delivery much more complicated. Because the SNR represents the Government's current preferred approach towards regional delivery, it will be important for stakeholders including the Government to ensure that the SNR arrangements will work for emissions reduction.

Lastly, there will need to be a process for monitoring and enforcing sectoral targets; by having these the analysis of where delivery is succeeding and/or failing can be made and corrective action can be taken.

Given the urgency of climate change, we need to keep the plan on course and the production of sectoral targets for each of the five year carbon budget periods highlighted above will enable this to happen. These targets should be measured in carbon reductions unless it is absolutely necessary to use proxy indicators. Where this is done, a clear

statement should be made in the Plan as to how the proxy indicator translates into carbon reductions.

In terms of specific sectors, and taking housing as an example, it is not clear that the Climate Change Plan identifies sequentially all the stages required for effective delivery. So whilst the top-level action is “To establish a clear regional pathway to ensure the region becomes a model for low carbon housing” it is not clear whether this regional pathway is an emissions trajectory or some other kind of maybe institutional route map; it might be the case that research and skills development are critical pre-requisites, but on the other hand what about the availability of finance, or the distinction between public and private sector housing providers? So far specific measures have something of a ‘hit and miss’ characteristic.

These comments applied to the other sectors, and in addition ‘energy’, ‘waste’ and ‘water’ do not contain specific actions and outcomes.

However the transport sector’s actions are a glaring example of the failure of the Climate Change Plan to address the scale of this sector’s emissions problem. They also highlight the current inability of decision-makers and programmes to respond to the sector’s emissions. Firstly, no quantitative targets are identified; but then actions 1.1-1.5 appeared to suggest that they will be able to deliver an outcome of “significant progress towards achieving the Accelerated scenario identified in the JMP/SEI report (2008)”. The JMP/SEI report consisted of a whole range of mitigation measures of which the Climate Change Plan has cherry-picked five. The report is explicit in that the interventions only work as a coherent package and each measure will not be able to contribute to significant emission reductions on its own. In fact, as they are, they will result in increased transport emissions. It undermines the credibility of the entire Climate Change Plan when weak measures are included purporting to be significant actions.

Secondly, it is noted that the section on transport only contains action on aviation emissions in regard to domestic flights and those to the near-continent. It is significant that only 37% of passengers using our three regional airports are travelling domestically and to the near continent. Because of the distances flown the passenger kilometers (a more direct proxy for actual emissions) from these flights account for about 5% of the region’s total.

The requirement of the Climate Change Act that carbon budgets should ‘take account of’ of IAS emissions would also apply to regional carbon budgets as well, and within the context established by the Climate Change Committee and accepted by the SoS: “To the extent that IAS emissions are not reduced by 80%, either these sectors would have to purchase credits, or more effort would have to be made in other sectors” – in other words, if regional aviation emissions continue to rise, then other economic and social sector emissions will have to be reduced even further.

We know that aviation is a growing not a reducing source of emissions; and in Y&H of the continued intention of the two principal regional airports and their local authority partners to expand their capacity and consequently the emissions generated (as evidenced by the growth plans currently under consultation from both Leeds Bradford and Doncaster airports).

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It is therefore essential that the Climate Change Plan requires a review of the regional policy frameworks relating to aviation in order to respond to the requirements of the Climate Change Act and of the Climate Change Committee. This will ensure that transport officers and regional to local decision makers, along with all the other stakeholders whose carbon budgets will be otherwise be constrained still further, are able to reconsider their existing supportive stance to airport expansion.

A danger of using a sectoral approach is that actions taken by the lead bodies for one sector may have a detrimental effect on the capability of another sector to reduce emissions. It will therefore be important that the 'Regional Climate Committee' or some other body is tasked with analyzing these potential trade-offs and recommending cohesive action.

Lastly the Climate Change Plan needs to address the issue of cultural and organisational change, specifically relating to decision maker organisations. This is a critical issue for the Climate Change Plan. At present, and with individual exceptions, our experience is that decision-makers in public sector authorities and organizations – whether politicians or officers – are choosing to ignore the issue of climate change in the discussions they have, the decisions they make and the resources they allocate. If this attitude of mind continues, the Climate Change Plan will fail for this reason alone.

For the Climate Change Plan to succeed on the other hand we need decision-makers to 'think climate change'; to move climate change reduction policies to the centre of their decision-making; and to show 'leadership' about climate change reduction programmes and process. And, in addition (and with defined exceptions) they will need to stop advocating policies and programmes that will result in increased emissions; and they will need to stop passively 'sitting on their hands' when participating in programme development in whatever sector and instead proactively challenge developments which will lead to increased emissions and champion developments which lead to reductions.

The Climate Change Plan is almost silent on this issue; so it does not seem to have recognised the existence or significance of the problem. There is a reference in action 7.1 to "coordinated campaigns [which] help regional and local bodies bring about changes in behaviour" – in which a role for Friends of the Earth and other voluntary sector bodies is envisaged – but we suspect that this may be focused on public rather than institutional behavioural change.

This issue was analysed in the May 2007 Arup/SEI report (Issues 2/3/4/5 pages 59-61 pdf) with a specific Recommendation 3: Wider communication and dissemination to policy makers and stakeholders about climate change – but the findings and recommendations of this report have not been connected to mainstream policy frameworks and have therefore been effectively set aside. The same applies to the SEI Transport and Climate Change report of April 2008. Some of the issues were addressed in the recent Scrutiny Report 13 'Meeting the Climate Change Challenge', but largely from the perspective of Yorkshire Forward, important though that is. Lastly, there is no clarity as to where and how effectively climate change will feature in the post-regional assembly SNR governance process now being developed by LGYH and the RDA pending final decisions on the SNR by the

Government. All this bodes very badly for the extent of practical delivery and commitment the Climate Change Plan will receive from decision-makers.

Therefore in both Priority Areas 1: Strategy and monitoring and 7: Citizen engagement, the Climate Change Plan needs to present a comprehensive set of proposals directed at decision-makers and the institutional framework within which they work.

### Comments on the text

At present this is not effective in the following respects:

- There is too much superfluous narrative, drawing attention and emphasis away from the central purpose of the Climate Change Plan - to contribute to quantified reductions in regional emissions that are contributory to regional and national reduction targets and carbon budgets - which is also not stated. It is essential that this purpose is identified most clearly in both the wording and structure of the Climate Change Plan. This will require treatment of how regional action fits within and contributes to the national framework established by the Climate Change Act.
- It needs to therefore set out the process (such as we have advocated above) as to how regional target and carbon budgets will be quantified and set, implemented via specified policy frameworks and programmes, and monitored and enforced.
- In particular it must identify the quantification of climate change targets/carbon budget; progress on emissions trajectories to date; and forecast trajectories for the future. On the basis of this quantification the Climate Change Plan must identify the extent of likely shortfall against anticipated targets/ carbon budgets.
- Each of the sectoral sections needs to establish a consistent quantified framework which identifies the actions which will sequentially and demonstrably deliver the emissions target established for that sector. Each section also needs to identify the resource implications of the proposed actions, and suggest a process by which those resources might be obtained.
- The inclusion within the Climate Change Plan (section 1 .4) of the NI 186 targets within local and area agreements is strongly supported, but more detailed actions and support will be necessary in order to ensure that these targets are met.

### Conclusions

Following the hugely important approval of the Climate Change Act Friends of the Earth is turning its full attention towards mechanisms by which the targets and carbon budgets set by the act will be implemented. This must include action at the regional level, a critical intersection between the national and local tiers, and a regional Climate Change Plan has an extremely important role to play as the necessary mechanism to mobilise co-ordinated activity in support of the national framework and the Government's drive to implement it.

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It is therefore essential that all regional partners and the Government can be satisfied that the Climate Change Plan will be able to undertake this role. At the moment, the existing Climate Change Plan does not meet this requirement, and additionally it must be revised in order to incorporate the scale of the Climate Change Act. It is **not** yet ready to be published as the definitive Climate Change Plan for the region for the period to 2013. Nonetheless, once revised, an *Interim* Action Plan could and should be circulated to provide the basis for an intensive programme of engagement with stakeholders over the next 12 months, to prepare the way for the definitive version.

Recognising the by now thoroughly tested strengths of the national legislative framework we believe that the best approach for the English regions would be the establishment of a similar framework in the Yorkshire and Humber region. We recommend that:

- Carbon targets and budgets are set for the region
- Annual monitoring and corrective action is implemented
- the regional equivalent of an independent Climate Committee, but with different functions (that complement the national committee) is established

We also welcome the sectoral approach adopted in the Climate Change Plan but are unhappy that quantified and evidence-based sectoral targets and sequential actions are not adequately identified for each sector. Consequently and from the outset the Climate Change Plan will not have credibility, and will not provide sufficient support for the government's drive for emissions reduction led by the Department for Energy and Climate Change (DECC).

Friends of the Earth and its local groups around the region will participate in, support and promote such a Climate Change Plan to the extent of our ability. But we will not be able to support a Climate Change Plan that we judge is likely to be ineffective, because by the time its weaknesses came to be revealed, it will be too late.

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<sup>i</sup> Stern Review on the Economics of Climate Change – HM Treasury - [http://www.hm-treasury.gov.uk/independent\\_reviews/stern\\_review\\_economics\\_climate\\_change/stern\\_review\\_report.cfm](http://www.hm-treasury.gov.uk/independent_reviews/stern_review_economics_climate_change/stern_review_report.cfm) October 2006

<sup>ii</sup> Climate Change 2007: Synthesis Report - Summary for Policymakers – Intergovernmental Panel on Climate Change [http://www.ipcc.ch/pdf/assessment-report/ar4/syr/ar4\\_syr\\_spm.pdf](http://www.ipcc.ch/pdf/assessment-report/ar4/syr/ar4_syr_spm.pdf) November 2007

<sup>iii</sup> [http://www.tyndall.ac.uk/publications/journal\\_papers/fulltext.pdf](http://www.tyndall.ac.uk/publications/journal_papers/fulltext.pdf)

<sup>iv</sup> “The RSS must include policies designed to secure that the development and use of land in the region contribute to the mitigation of, and adaptation to, climate change.” (clause 2A)