



**CONSULTATION ON HILLINGDON DRAFT
STRATEGIC CLIMATE CHANGE ACTION PLAN**

**COMMENTS FROM HILLINGDON FRIENDS
OF THE EARTH CLIMATE ACTION GROUP**

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Key points

General

- Addressing the nature emergency, as well as the climate emergency, is essential.
- Actions should also help to deliver sustainable development.
- The ambition should be to work towards greenhouse gas emissions as near zero as possible, with targets for the whole Borough, not just the Council.
- Action is needed because of the impact of climate change everywhere in the world, not just because of the impact in Hillingdon.
- Full and effective engagement with all parts of the community, including vulnerable people, must underpin how actions are developed.
- The lead Council officer must have access to the resources needed to ensure all Council decisions take account of the climate and nature emergencies.
- An additional Theme in the Strategic Plan would provide flexibility to permit actions outside the scope of the existing themes and actions to be developed.
- What is agreed now must leave space for innovative and creative, as well as ambitious, actions to be developed for the Council and the whole community.

Theme C1: Community Leadership

- Targets for the whole Borough to reach net zero emissions and end biodiversity loss should be underpinned by a clear strategy of actions and interim deadlines.
- Actions, advice about actions and promotion of actions should all be developed and rolled out by effective engagement with all parts of the community.
- Properly representative citizens' assemblies may be needed to ensure that the views of people who are most disadvantaged are taken into account.
- A joined up heating and energy efficiency strategy for Hillingdon is needed.
- Government funding to help improve energy efficiency in all buildings is essential.
- Prioritising fuel poor households is important, but action must benefit those in privately rented properties and social housing as well as owner occupiers.
- An action plan targeting and prioritising climate change action at the most vulnerable people and the areas they live in would be beneficial.
- All educational establishments must deliver on agreed actions by agreed dates.
- Schools should have a sustainable transport policy and show a lead in promoting active travel that will help to reduce air pollution.
- Healthy and climate friendly eating should be promoted for schools and generally.
- Action on sustainable transportation must prioritise active travel and public transport, with step-free access at all stations within 5 years.
- Working towards much reduced use of cars is essential, but the best and fairest infrastructure for electric cars is also important.
- Changing to all electric buses and taxis to reduce air pollution in the south of Hillingdon should be a priority.

Theme C2: The Council's Own Operations

- There must not be reliance on unrealistic possibilities for carbon offsetting.
- A climate and nature impact assessment should inform all plans, strategies and decisions, so that they reduce the impact of the climate and nature emergencies.

- Adjusting procurement and other activities that reduce Scope 3 emissions where possible would make the Council a more effective leader of the community.
- Exploring funding sources that might enable more action is important.
- The Council's commitment on carbon neutral (i.e. net zero) buildings must apply to council housing and council-managed schools too.
- A further commitment to zero carbon for all council property by a specific date should also be agreed, with yearly targets to ensure action takes place.
- There should be a rapid transition of the Council's own fleet to electric vehicles.
- The Council's approach to its own operations can show community leadership to reduce business travel and commuting by car generally.
- Energy generation from renewable sources must be investigated generally across Hillingdon, with action that then delivers such energy wherever possible.
- All new Council buildings, including new council housing, must be fitted with renewable energy sources wherever possible.

Theme C3: Building Better Places

- Supporting reskilling, training and research to accelerate reduction of carbon emissions in Hillingdon should be part of a sustainable development policy.
- All new developments should be better than zero carbon, and also enhance the environment and nature.
- Effective enforcement of building standards and other matters is essential.
- Private new developments should have renewable energy sources installed.
- Buildings in new developments should meet Passivhaus or equivalent standards, with no exceptions to meeting such standards for buildings on the Council's land.
- The development plan should prioritise sustainable transportation, and new developments should reduce the need to own and use a car.
- All new developments should have flood resilience.
- Protecting green spaces, the green belt and sites for nature should be a priority, with more green spaces created in parts of Hillingdon not currently well served.
- Developers must commit to compensation for any loss of biodiversity, and a net gain of biodiversity, with proper assessments to ensure delivery.
- No loss of trees should be the starting point in development decisions.

Theme C4: Using Clean and Green Energy

- Clean and green energy, focusing on reducing carbon emissions rather than carbon offsetting, is important for all parts of the community.
- More community/district heating could be explored, and existing networks changed where necessary to reduce emissions.
- Producing energy as near to the point of use as possible, such as using solar technologies, to avoid losses in transmission, should be the aim for everyone.
- The Council should show leadership by not acting in ways that make carbon offsetting look like an easy or the best solution; it must only be a last resort.
- The Council should commit to action beyond 2030 if necessary to quickly remove any residual reliance on fossil fuels in Council energy supplies.
- Disinvestment of the council's own funds, and in particular of council pension funds, away from fossil fuel companies is important.

Theme C5: Waste Management

- Prioritising “Avoid, Reduce and Reuse” ahead of recycling is important, and a community campaign that promotes the waste hierarchy could be really helpful.
- The aim should be for recycling to happen in the UK wherever possible.
- There should also be the aim of sending zero waste to landfill or incineration.
- Setting challenging interim and final targets, including on reduction of waste in the first place, and ensuring that targets are met, is important.
- The Council should show leadership to businesses in Hillingdon by modelling best practice in its own operations that minimises waste.
- Council decisions on procurement should promote the circular economy.
- Promoting the growing of food should be coupled with action to minimise food waste and promote sourcing food more sustainably.

Theme C6: Climate Change Adaptation and Mitigation

- Climate change mitigation is important, as are actions to address the nature emergency; but the loss of biodiversity should be addressed in its own right.
- Difficult or contentious choices, such as loss of green spaces in gardens, need additional decision-making processes, such as a citizens’ assembly.
- The most vulnerable and the communities they live in must first be identified, and then fully engaged with as actions are developed.
- Green space management must involve looking at more than water efficiency as an adaptation measure.
- All property should have flood resilience and make space for water.
- Any campaign must engage people and communities in developing solutions.

Theme C7: Carbon Offsetting

- Neither the Council nor any part of the community should rely on offsetting as an easy solution; aiming for emissions reduced to near zero must be the priority.
- Relying on offsetting purchased outside the Borough and/or from carbon capture and storage from industrial processes is unrealistic and/or likely to be unfair.
- Any reliance on offsetting must be totally transparent and store additional carbon.
- A tree strategy, with more trees and better management, would help address the nature emergency, but should not provide an excuse for continued fossil fuel use.
- Additional sequestration of carbon in trees and green spaces is good, but assessments of what carbon is stored and timescales for this must be accurate.
- Funds from developers for climate actions and nature restoration must not replace building homes that are better than zero carbon.
- Assessing compensation for loss of biodiversity as a result of developments, as well as commitments for biodiversity net gain, must be accurate and transparent.
- Targets for green space improvements and additional tree cover are important, with rewilding often being a good option to deliver the best results.
- Improved air quality requires actions well beyond street trees and green spaces.
- Hillingdon should have a comprehensive nature and ecosystem recovery plan.
- Good public access to green spaces is important, and new green spaces in the south and east of the Borough in particular are needed.

Hillingdon Friends of the Earth

Hillingdon Friends of the Earth (HFoE) has been a local group affiliated to Friends of the Earth (FoE) for more than 30 years.

HFoE set up a Climate Action Group in January 2020 with over 60 people attending the first meeting. Clearly the pandemic has altered how we have been able to meet and take action since then, but we have not been inactive.

Our work has been underpinned by the FoE campaign to set up local climate action groups. FoE then make resources available¹ to help those groups lobby and work with their local councils. Those resources include research undertaken by FoE alone, or in partnership with organisations such as Ashden². Some research is specific to each local authority, so that relevant figures specific to Hillingdon are easy to find³.

A number of references to this research will be made throughout this response.

In order to better understand and inform ourselves about issues relevant to the climate emergency, we have set up a number of sub-groups looking at specific issues, including energy, waste, transport and buildings. This response to the consultation on Hillingdon Council's draft Strategic Climate Change Action Plan has been informed by this material and these activities, and so involves contributions and insights from a number of people.

We were pleased that Hillingdon Council declared a climate emergency in January 2020, although disappointed that the scope of the general commitments made at that time would have been very limited. We are therefore pleased that the draft Strategic Climate Change Action Plan has extended the scope of commitments somewhat beyond what it seemed might follow from that declaration. However, we remain disappointed about a number of limitations in, and omissions from, the draft Plan, and so very much hope that there will be even more improvements as future, more detailed action plans – as shown in Section 6 of the draft Strategic Plan - are developed.

We would like to think that there will be processes under which we can continue to make suggestions as these more detailed plans are developed, and that the same engagement will be possible for all parts of the community. We have indicated in a number of places how important it is to develop actions with the community involved in that process rather than direct actions at the community.

However, we do hope that the knowledge we can draw on from the wider FoE organisation, and the partners they work with, is recognised as something that might be helpful, so that those developing future plans do not hesitate to contact us for comments, insights and so on when appropriate.

¹ See for example [Get your Council to adopt a Climate Action Plan](#)

² See [Affordability, co-benefits and carbon saving: the top Climate Actions for councils](#)

³ See "[How climate friendly is your area?](#)" – entering a Hillingdon Borough postcode gives information for the Borough

Detailed Comments on the Plan

We start with some comments on the Plan in general, and then focus on each Theme in turn. We have deliberately followed the sequence of the Plan, especially when considering the seven Themes, as we hope that this will make for easier reading.

We start from the understanding that this is a *Strategic* Action Plan that will be followed by more detailed and targeted Action Plans. However many of our comments are deliberately looking ahead. So whilst we attempt to address each Action within each Theme directly, we often use an Action as a sort of “jumping-off point” to explore ideas that follow on logically from what may at this stage be only a limited Action. **This is because we have a lot to say about how we would like to see the future.** We hope that our comments will be seen as useful and constructive.

General Comments

The declaration of a Climate Emergency and now a Strategic Plan are, of course, critically important to actions that the Council and the whole community in Hillingdon needs to take because of climate change. However, these actions also need to address the nature emergency. **The climate and nature emergencies are, of course, linked. It will not be possible to deliver the recovery of nature that is needed without reducing carbon emissions.**

We do in places in our comments mention the nature emergency, but all of our comments should be read with the awareness of those links in mind. Acting to address the climate emergency will play an important part in addressing the nature emergency. The reverse is also true, though, in that nature’s recovery helps address the climate emergency by halting the loss of carbon from degraded habitats and even by storing more carbon⁴.

Addressing both the climate and nature emergencies should, though, also have regard to the importance of delivering sustainable development. For example, many of the 17 Goals for Sustainable Development set out by the United Nations⁵ are at least partly relevant to Hillingdon. The Government has also set out how these Goals are being implemented in the UK⁶ and indicates that “*the most effective way to do this is by ensuring that the Goals are fully embedded in planned activity of each Government department*”. We would argue that local authorities must play their part too, by ensuring that the Sustainable Development Goals are

⁴ See for example the report “[Kick start nature’s recovery](#)” published by the Wildlife Trusts in June 2020

⁵ See United Nations Department of Economic and Social Affairs, Sustainable Development – [The 17 Goals](#)

⁶ See [Implementing the Sustainable Development Goals](#) published on 5 July 2019

embedded in policies and activities at the local level. This should, of course, include the draft Strategic Plan and actions developed under it.

Some of the commitments in the draft Strategic Plan are to deliver a net zero or carbon neutral outcome. Whilst it is reasonable to have this as a goal to achieve, it should not be the final goal. **The ambition should be to work towards as near zero carbon emissions as possible rather than only net zero.** Net zero could still hide significant carbon emissions because it relies on being able to deliver good results on carbon offsetting. A continued reduction of emissions towards zero must always be the aim, given the problems we have indicated in our comments, on Theme C7 in particular, of too much reliance on offsetting.

We welcome the Vision set out in the draft Strategic Plan, namely “*to become the greenest London borough, to protect and enhance the environment, and to provide a brighter prospect for future generations.*” This overriding aim for Hillingdon would deliver something worthwhile on many of the issues that are particularly important to us, but the aim does, of course, have to be coupled with really challenging actions and specific and measurable targets, including interim targets. We welcome the statement in Section 6 that “*The Strategic Plan is therefore a catalyst for a series of other more detailed plans that will include actions and targets following the consultation on this document.*”

Although the draft Plan could provide the basis for developing these targets, we are concerned that a number of the actions that have been set out in the plan are too narrow and limited. We very much hope that as future more specific plans are developed, the ambition in this Vision is fully met.

Corporate Climate Commitment 1, namely to “*lead and inspire our residents, businesses and schools to reduce their own carbon emissions*”, is something that we welcome, as it recognises that actions beyond those where the Council has direct control are clearly a big part of the draft Strategic Plan. It is however noticeable that while the other two Climate Commitments offer a clear target of 2030, this Climate Commitment does not. The implication is that such a target, and interim targets, may not be set for the Community Action Plan proposed in Section 6. At least two other London boroughs where the Councils are controlled by Conservative councillors have made overriding commitments to deliver net zero emissions for the whole of the borough by a specific date and not just for corporate operations⁷. **We very much hope that the Council will therefore agree a target date for delivering at least net zero emissions for the whole Borough.**

Corporate Climate Commitment 2, namely to “*invest in energy saving measures across the property portfolio. This applies to public access buildings and sites where the Council pays for the energy supplies, our vehicles and highway assets like street lighting and car parks*”, sounds helpful. However, the property portfolio should also include council housing as we have indicated in our comments on Theme C2. We have, moreover, in various places in our comments on the themes in the draft

⁷ [Westminster](#) and [Kensington and Chelsea](#) have both committed to net zero for the borough by 2040 as well as net zero for council operations by 2030

Strategic Plan indicated how important it is for action regarding energy saving measures to apply well beyond what happens for the Council's property portfolio.

Corporate Climate Commitment 3, namely to "*achieve 100% clean energy across the Council's services by 2030*", appears to be somewhat misleading. The further explanation of this ends by saying "any remaining fossil fuel use will be incorporated into the carbon offset programme". This does not, therefore, sound like the headline of 100% clean energy if some non-clean energy can be used so long as that use is offset. It may be that the Council believes that so long as there is offsetting, this counts as "clean energy", in which case this commitment is not nearly as good as it might sound. We suspect few people are likely to interpret the commitment other than to mean that 100% renewable energy is to be achieved.

Some of the discussion on pages 3 to 7 of the draft Strategic Plan could leave the impression that the Council is only committing to action because of problems in the UK, and Hillingdon in particular. We would very much like to see **the Council clearly acknowledge that Hillingdon should take action to address the climate emergency because of the impact of climate change everywhere in the world.** Indeed, in our comments on carbon offsetting in particular, we say how important it is not to unfairly export actions to the global south in particular in order to meet targets in the UK. More generally it should be recognised that people and communities who have done least to cause the climate crisis are those who are being hit hardest first⁸. This idea of "climate justice" also acknowledges that such communities are predominantly people of colour.

The draft Strategic Plan sets out a number of actions that the Council has already taken to reduce carbon emissions. We are pleased that these successes are not being used to minimise the need for further, and more difficult, action now. So the draft Plan helpfully sets out in the starting position the carbon emissions in the Borough that still need to be addressed and repeats the commitment for the Council "*to take a leadership, influencing, promoting, and supporting role to encourage those sectors outside of our control to follow our lead.*" In order to be more transparent about the impact of actions, or inaction, it would, though, be helpful for the Council to make data available about emissions in each ward.

We do realise that some actions will be difficult as they do, as acknowledged in the draft Plan, require action at a national level. But the Council, acting with other councils when appropriate, must be prepared to lobby the Government to act when necessary, including to provide councils like Hillingdon with more powers and more resources where this would be helpful. In the interests of transparency, it would be helpful if the Council could publish what powers it already has, and what further powers it needs to enable the actions required.

We realise that the Council already has links with other councils in various ways, including as a member of London Councils, which according to its website "*makes the case to government, the Mayor and others to get the best deal for Londoners and to ensure that our member authorities have the resources, freedoms and powers*

⁸ See for example [Climate change and air pollution are race issues](#) published by Friends of the Earth

to do the best possible job for their residents and local businesses". We note that one of the key themes for London Councils is environment policy, including air quality, climate change, fuel poverty, waste management and flooding, which are, of course, all issues relevant to this draft Strategic Plan.

We assume that Council officials are aware of all of these resources and possibilities for coordinating action, but we would in particular like to draw attention to the latest version of a Blueprint⁹ that has been produced by Friends of the Earth and a number of other organisations, with support from the Local Government Association and London Councils. As indicated in the Blueprint, it "*sets out the national leadership, policies, powers and funding needed to empower local authorities to deliver at scale, working together with communities and businesses.*" We hope that Hillingdon Council finds this Blueprint useful to decide how to work with other local authorities (through London Councils or otherwise) to seek Government action enabling local authorities to play their full part in delivering on the Government's net zero target.

The draft Strategic Plan is, of course, just the start, and a number of further, more detailed plans are promised. **It will be absolutely essential that these are developed with full engagement with all parts of the community.** Engagement with businesses and interested groups such as us will, though, need to be developed in different ways to engagement with individual residents, but all types of engagement are essential. One or more forums or a commission could be part of how engagement with businesses and interested groups is developed.

A helpful early step towards engaging better with residents could be a Climate Assembly, similar to the existing Hillingdon Older People's Assembly and the Hillingdon Disability Assembly. It would enable people across the Borough to network and perhaps get some new Hillingdon eco-projects or eco businesses off the ground as well as enabling residents to engage with council officers about how to integrate fighting climate change into the Council's work. Some of the resources published by the Climate Assembly UK¹⁰ could be used to facilitate debates about the many relevant issues.

To decide upon the most difficult and contentious issues, particularly where it is important to get acceptance from residents, engagement by citizens' assemblies or citizens' juries is, though, likely to be most appropriate. Residents attending these would need to be selected so that they are properly representative of residents in Hillingdon¹¹. In all cases, decisions that have an impact on the most vulnerable people¹² and communities must be made the right way. The Council must ensure

⁹ See [A blueprint for accelerating climate action and a green recovery at the local level](#) published in January 2021. An earlier version published in June 2021 was [highlighted by London Councils](#)

¹⁰ The [Resources page of the Climate Assembly UK](#) has links to the videos and transcripts of all the presentations made to the assembly

¹¹ As indicated by the organisation [Citizens' Assembly](#), such a representative citizens' assembly has been established in Oxford to consider climate change issues. The Climate Assembly UK that we mention in footnote 10 was, of course, also such a representative citizens' assembly.

¹² The draft Strategic Plan refers to "vulnerable people" and we assume that this includes all those who are more vulnerable than others to the impacts of climate change, whether this is by reason of low income, poor health or disability, where they live, or anything else. All are included in our references to vulnerable people.

that they are involved in working out what is best. **Future actions must reflect what vulnerable people say they need rather than what the Council thinks they need.**

We are pleased that the Council has identified both a Councillor and lead officer responsible for this policy area. The lead officer will need to be able to act to ensure that all decisions across the council departments take account of the nature and climate emergencies. This is a daunting task and so **the lead officer must have sufficient resources to be able to deliver this.** The Councillor must then ensure that this is working well, and be ready to step in with other councillors to help sort things out when problems arise. It is perhaps worth noting that the Councillor is the Cabinet Member for Environment, Housing and Regeneration, which is an extensive portfolio.

Section 7 of the draft Strategic Plan commits *“to providing an annual report on the actions within this Strategic Plan along with the supporting specific action plans”* (the Plans referred to in the diagram in Section 6 of the draft Strategic Plan). We welcome the subsequent comments on the level of engagement that the Council would wish to see, although we would prefer reporting to be bi-annual, with progress on any targets properly audited. However, nothing has been mentioned specifically about consultation on the more detailed Action Plans *before they are finalised*, and we believe such consultation is essential.

Theme C1: Community Leadership

Overview

We welcome the Council's recognition of the role it can, and should, play in addressing the climate emergency across the whole of the Borough, not just in its own operations. Businesses located in Hillingdon, and those carrying out commercial activities in Hillingdon, need to address their carbon footprints and make meaningful commitments to reduce them every year, with the aim of being carbon neutral on a reasonably challenging timescale, underpinned by a commitment to continue to reduce emissions to as near zero as possible.

Residents also need to play their part, as do those parts of the community that do not operate for a profit, such as educational establishments, places of worship and community, health care and leisure centres, and any activities they carry out in the community.

A number of the commitments under this Theme will help to address this, but we are disappointed that there is no target to make the whole of Hillingdon Borough at least carbon neutral (i.e. net zero) by a specific date. A number of other London boroughs have such a target. For example, as we have indicated above, the Councils for Westminster, and Kensington and Chelsea both have a commitment of net zero for the whole of their boroughs by 2040 as well net zero for council operations by 2030.

A target therefore needs to be set for the whole of Hillingdon Borough to reach net zero greenhouse gas emissions by a specific date. A target should also be agreed for seeing an end to the loss of biodiversity and the start of a recovery of nature, which should be at least as good as the one now set for the country in general¹³. It is important not to lose sight of the need to address the nature emergency as well as the climate emergency. Targets are really important to set a direction of travel.

However long term goals can mean that little or nothing is done now. Interim targets, preferably annual targets, are therefore crucial too. **A clear strategy should therefore be developed in terms of targets, actions and deadlines for the whole community in Hillingdon**, and this should be done without delay¹⁴. We note that in Section 6 of the draft Strategic Plan that "*The Strategic Plan is therefore a catalyst for a series of other more detailed plans that will include actions and targets.*" The nature of the "more detailed plans" suggests that they will include interim targets, but this cannot be just an option, it is essential.

The Council's power of persuasion as the body that can provide leadership in Hillingdon is of course really helpful, and may go a long way towards delivering on a target for the whole Borough. The specific actions under this Theme, if they are

¹³ In a recent speech the Environment Secretary announced a target on species populations for 2030 – see [DEFRA Press Release of 18 May 2021](#)

¹⁴ The [Tyndall Carbon Budget Tool](#) developed by the Tyndall Centre for Climate Change Research at the University of Manchester provides some useful information about [Setting Climate Commitments for Hillingdon](#) that should inform the target setting process.

developed and expanded as we have suggested, are therefore important. We do, of course, understand that the Council will not always have the power to enforce action by others where persuasion is failing to deliver good outcomes, but it should, though, be willing to use the power where it has it. And where it does not have the power, it should, working with other local authorities where appropriate¹⁵, lobby the Government to be given stronger powers.

Comments on specific actions under Theme C1

a) C1.1 - Promote the concept of zero carbon communities.

We do not know what is intended by this action as the concept of a zero carbon community could mean one that emits no carbon. Striving for communities with carbon emissions as close to zero as possible is something that we have said should be the ultimate aim for the Borough. The council should, therefore, work towards delivery of this and not just promotion of the concept. An action that would promote this would be a welcome first stage though.

Although also relevant to some of the other actions under this Theme, it seems appropriate here to suggest that the Council should facilitate and support the creation of an eco-centre or climate emergency centre¹⁶ in Hillingdon. Such a centre would be a valuable way of ensuring there is a genuine focus to tackling the climate emergency in the Borough. A climate emergency centre would be self-funding, bringing together diverse groups and individuals in the local community to build solutions, relationships and resilience in the face of the climate emergency. There is a potentially suitable site for a centre and garden at the former Yiewsley swimming pool.

b) C1.2 - By the end of 2021 we will have a dedicated online learning resource to provide detailed advice and guidance on how to lower a person's carbon footprint.

Advice and guidance about how to lower one's carbon footprint is clearly useful. However, the nature of that advice needs to be considered carefully to avoid saying things in such a way that makes some people feel vulnerable, when there is little they can do to reduce their carbon footprint given their specific circumstances. **Such advice should therefore be developed, and regularly updated and improved, in collaboration with the communities it is aimed at.** It will also be important to find ways of ensuring that everyone has the possibility of access to this information, including those who are unable to easily access information online. We are pleased that this Action actually includes a target date for delivery as such targets are largely missing from the draft Strategic Plan at the moment.

c) C1.3 - To use our unique access to communities through, for example residents associations, to develop community forums and groups to support and promote climate actions.

When read alongside Action C1.5, our perception is that, whilst businesses are being asked to **develop** ideas for action collectively, community forums and groups are being asked only to **support and promote** actions that have been determined by the

¹⁵ Such as through London Councils as we have indicated in our general comments

¹⁶ [Climate Emergency Centres](#) already exist in a several places, including in Staines

Council. We don't know whether this is intentional, but it is surely important for **both** business and other groups to participate in developing ideas for actions and in supporting and promoting those actions. We will make that assumption in our response.

Section 7 of the draft Strategic Plan says that *“Responding to the climate emergency requires a collaborative effort from everyone. It is therefore important that there is full engagement. It is also important to ensure that everyone has the opportunity to present their ideas and their experiences to ensure that the Council is progressing in the right direction.”* We couldn't agree more.

A number of approaches are possible to involve communities in the decision-making process. Some other London boroughs have already used ways other than a formal consultation such as is being used to develop this Strategic Plan for Hillingdon. For example, Wandsworth held a Climate Summit last year and is now holding Climate Conversations¹⁷. Westminster has not yet developed an action plan, but did hold a virtual Open Forum¹⁸ last year which will inform that. Complex or contentious choices are likely to require additional approaches, such as representative citizens' assemblies or citizens' juries.

We have in our general comments indicated that a Climate Assembly might be a helpful way to engage with residents. There is therefore plenty of room for improvement, copying approaches that have been used elsewhere or otherwise. A very early change could be ensuring that the Council's website invites a continuing dialogue between the Council and residents after this consultation has closed. An invitation to feed in ideas and comments on climate change at any time, such as has been done by Westminster Council¹⁹, could deliver this.

The Council therefore needs to identify and then implement the most effective ways of engaging with residents on the climate and nature emergencies. This should ensure that the voices of those most impacted by climate change are heard, particularly bearing in mind that these people are often those who are also most disadvantaged. **Properly representative citizens' assemblies may have a particularly important role to play to ensure that the views of those who are most disadvantaged in the decision making process are taken into account.** But this is only if such assemblies are organised to ensure those people are properly supported, so that they can take part without loss of income and so on.

d) C1.4 - Support the access of funding for the 'greening' of residential properties and businesses.

According to FoE research, only 38% of homes in Hillingdon are well-insulated²⁰, which clearly illustrates how essential this Action is (when taken in conjunction with Action C2.1 for council houses)

¹⁷ See Wandsworth Council's [Climate change news and campaigns](#)

¹⁸ See Westminster Council's information about [Tackling climate change](#)

¹⁹ See [“Have your say on climate change”](#)

²⁰ See footnote 3

Supporting those who wish to “green” their residential properties or businesses is therefore essential. But there is at the moment no clarity on what and how much funding might be provided, and there are no yearly targets that could, for example, make sure that all existing buildings are retrofitted. Developing how this Action might make a real difference and deliver energy efficient buildings (both residential and non-residential) should therefore be a priority. This should be part of a **joined-up heating and energy efficiency strategy for Hillingdon**.

Such a strategy should also include actions that facilitate relevant skills and training so that it does not fail due to lack of a workforce able to help implement it. This would, of course, also increase local employment and aid recovery from the COVID-19 pandemic. Such training should lead to local employment opportunities for installing insulation, as well as the development of renewable energy and energy storage.

Research into the best approaches for retrofitting buildings is also important. We know that Brunel University London is involved in research activities in this area²¹. The Council should find ways to promote, and facilitate, engagement between those involved in relevant research in Hillingdon and others who might benefit from this knowledge.

The ideal scenario that should be delivered by a heating and energy efficiency strategy for Hillingdon would ensure that all existing residential (including rented as well as owner-occupied) properties and non-residential buildings in Hillingdon are retrofitted with highly energy efficient measures to have an EPC rating C, and higher wherever practicable. According to FoE research, in order to achieve this by 2030, an average of 7116 homes (presumably including council houses, so see also C2.1) need to have their insulation upgraded every year²².

Action as indicated in C1.4 and our proposed heating and energy efficiency strategy is, of course, in part dependent on whether or not there is any funding to access for retrofitting residential and non-residential buildings with highly energy efficient measures. Given that the funding that was supposed to help house owners achieve more energy efficiency has now been stopped, the **Council needs to lobby the Government, either alone or with other local authorities²³, for a good replacement to the Green Homes Grant, as well as other sources of funding for other types of property**. The Council should also consider what other incentives could be provided for the change to energy efficient/sustainable buildings to encourage communities to make the change.

Non-residential buildings should, of course, include those used by businesses (commercial and industrial, factories and offices), but also all educational establishments, places of worship, community buildings, and leisure and healthcare

²¹ For example, Brunel University London’s recent “[Research Festival: Sustainability](#)” included a lecture on Retrofitting Residential Buildings to Net Zero Energy

²² See footnote 3

²³ Such as through London Councils as we have indicated in our general comments

buildings. These actions need, moreover, to have buy-in from those who need to take action. Businesses therefore need to be engaged via the forum proposed by Action C1.5 or otherwise in developing Action C1.4. As indicated in our comments on Action C1.3, other parts of the community also need to be involved in developing any actions, including this Action. The Council's leadership role, in influencing others when actions have been decided, must also extend to facilitating collaboration to develop those actions in the first place.

e) C1.5 - To use our unique access to businesses to set up a borough wide Climate Change forum to develop ideas collectively to collaboratively work towards achieving climate change objectives.

When read alongside Action C1.3, our perception is that, whilst businesses are being asked to **develop** ideas for action collectively, community forums and groups are being asked only to **support and promote** actions that have been determined by the Council. We don't know whether this is intentional, but it is surely important for both business and other groups to participate in **both** developing ideas for actions and supporting and promoting those actions. We will make that assumption in our response.

As indicated in the comments on Action C1.3, **all parts of the community need to be involved in how decisions are made, not just businesses**, not least because some decisions might not be ones that businesses would readily support, even if they are the best ones needed in order to address the climate emergency effectively.

Moreover, businesses, particularly SMEs, may then need support to help them deliver on the ideas that have been developed. SMEs often don't have the expertise or capacity to fully understand what they need to do to address the climate and nature emergencies. The Council should therefore develop ways to bring these businesses together not just to develop ideas, but also to give them advice, including on what funds there are to help them change.

Facilitating collaboration could, of course, help with the development of new eco-businesses. Indeed, there could be cross-fertilisation between ideas that might emerge from a Climate Assembly that we have suggested in our general comments and those wanting to set up and expand businesses in climate friendly ways.

Collaboration on ideas and support may, of course, be possible via some existing networks. For example, Local Economic and Nature Partnerships (LEP and LNP) may both be helpful. We understand that the Council did in the past secure funds from the LEP's London Regeneration Fund for improvements to Uxbridge town centre, which, amongst other things, was to pay for improvements to the route for pedestrians between the High Street and Fasnidge Park. The Council should revisit the usefulness of both LEP and LNP partnerships regarding climate action and nature recovery ambitions.

Ensuring that green jobs can be advertised and found is also important. There are, of course, already ways of doing this²⁴, but the Council should ensure that there are ways to easily advertise and find green jobs in Hillingdon.

f) C1.6 - We will prioritise fuel poor households for assistance with accessing grant funds to improve energy efficiency and reduce their energy costs.

According to FoE research, 10% of households in Hillingdon are in fuel poverty²⁵, which means they can't afford to heat their homes properly.

Essentially, this Action is a “special case” of Action C1.4 but **the recognition of the need to prioritise fuel poor households for assistance with grants to improve energy efficiency is welcome.** The Council should also **help energy companies target fuel poor or vulnerable households with energy efficiency measures.** Energy companies should not be permitted to avoid their obligations to help fuel poor and vulnerable households with insulation.

Energy efficiency grants that might be delivered by Action C1.6 can clearly benefit owner occupiers but will, though, not necessarily help those in rented accommodation. The Annual Fuel Poverty Report 2020 issued by the Department for Business, Energy and Industrial Strategy indicates that fuel poverty is highest for private renters²⁶. In order to target action at the most vulnerable, it will, therefore, be important for the Council to assess how fuel poverty arises in the Borough for different types of tenure and then devise the best action or actions.

Some fuel poor households will be living in rented council or other social housing. Regarding council housing, actions should be developed under Theme C2 to ensure that this type of housing is modified to address the needs of fuel poor households. For other social housing the Council should take a leadership role to address the needs of fuel poor households living there. **The Council needs to take action to ensure that energy efficiency is improved in all social housing in the Borough.**

Many more fuel poor households will, though, be living in private rented accommodation. **Councils have a duty to enforce minimum energy efficiency standards in the private rented sector**, but few seem to have done this. It would be really good if Hillingdon were to take a lead in showing other councils in London the importance of doing this effectively, possibly modelled on the action that has been taken by Oxford City Council²⁷, which seems to be enforcing these standards effectively. The action must, however, be comprehensive. If those landlords who have improved energy efficiency feel they can charge higher rents than other landlords who have not taken any action, households may not be able to afford to continue to live in their homes and the Council, will, of course, then have to address more homelessness.

²⁴ Such as the websites [GreenJobs](#) and [Nextdoor](#)

²⁵ See footnote 3

²⁶ Figure 3.14 on page 31 of [Annual Fuel Poverty Statistics Report, 2020 \(2018 data\)](#) indicates that the proportion of households in fuel poverty was highest for private renters at 17.7 per cent whilst owner occupiers have the highest average fuel poverty gap

²⁷ See Oxford City Council's information about [changes to the private rented sector](#)

Delivering an action effectively that will help fuel poor and other vulnerable households does, of course, require them to all be identified. There are other actions, such as regarding flood risk and lack of green space nearby, that should target the most vulnerable people, and areas most vulnerable and at risk. The discussion of the Actions under Theme C6 does seem to recognise the need to identify the most vulnerable as it says “*we need to identify the most vulnerable and those at risk and ensure we put in place support and resources so that the impacts of climate change are managed appropriately*”. How this is done needs to be developed and apply to relevant actions under the other themes too. Some joining up across themes is therefore needed. **A specific future action plan for targeting and prioritising climate change action at the most vulnerable people and the areas they live in might be a good approach.**

g) C1.7 - By 2023 for all our managed schools and educational facilities to have their own Climate Action Plans in place.

Ensuring that schools and other educational facilities managed by the Council have their own climate action plans is welcome, but the detail about what might be required in such a plan needs to be spelt out. Heating and energy efficiency for the buildings as discussed for the more general Action C1.4 is, of course, crucial. This should include requiring schools to have their own renewable sources of energy such as solar panels (photovoltaic or thermal)²⁸ wherever possible, They should also look at their procurement to identify ways to mitigate the nature and climate emergencies. Action is, moreover, needed on school meals, ensuring that these follow the official Eatwell Guide²⁹ on healthy eating and most menu options are plant-based, with less and better meat or fish as other options.

Schools and other educational facilities should also have some responsibility for delivering sustainable transport to and from the schools for both staff and students. Educational establishments need to consider how they can act to promote, persuade, facilitate and perhaps in some cases enforce the use of sustainable transport by both staff and students. For staff, the option of car-sharing that we mention in our comments on Action C1.9 may sometimes be relevant. The issue of car parking levies that we mention in our comments on Action C2.4 may also be appropriate sometimes.

We believe that schools should have a written sustainable transport policy which, amongst other things, identifies safe walking routes to schools, provides school buses where the catchment area extends more than, say, a 30 minute walk from home, and prevents vehicles from idling, and from parking within, say, 400m of the school gates (except for people with a disability affecting mobility).

Where there is a need for action beyond the school gates, such as better bus services, and more safe spaces for pedestrians and bicycles, then it will be very important for the Council to work with educational establishments to help deliver these. Moreover, the Council must be prepared to use its powers to enforce any

²⁸ Solar panels may be thermal devices (producing heat) or photovoltaic devices (producing electricity that needs to be used immediately or stored or fed into the National Grid).

²⁹ The [Eatwell Guide](#) has been developed by the NHS

existing and new parking restrictions outside schools. Indeed, the Council should encourage schools to take part in the School Streets Initiative³⁰, and support and enforce the actions this would require. This Initiative is already leading to a temporary restriction on motorised traffic at school drop-off and pick-up times in roads outside schools in a number of other London boroughs.

Everyone living in Hillingdon is aware of the extra traffic on the roads at school drop-off and pick-up times, but data that shows how many private car journeys are actually undertaken for this reason, how long they are, and whether or not they could easily be done by a form of active travel or by public transport rather than in private cars, does not seem to exist.

In order to best inform how policies on transport to and from schools are further developed, we hope that the Council can find ways to collect this data on an ongoing basis. It may be worth exploring whether any other Councils have access to this type of data.

The Council should also encourage the Government to collect data on transport to and from schools nationally so that successes and failures with sustainable transport policies for schools can be shared and the best adjustments made by all in the future.

Sustainable transportation is, of course, an issue that needs to be addressed well beyond what could be delivered by educational establishments and we say more about this in our comments on Action C1.9. One issue that we want to say more about under this Action, though, is the need to reduce air pollution. The landmark ruling by a coroner at the end of last year, that the death of a 9-year old child was in part due to air pollution³¹, illustrates how damaging our failure to act can be to the health of young people. Some recent research has shown that the damage can begin before birth, with cases of asthma in young children linked to in-utero exposure to air pollution³².

Emissions from vehicle exhausts, and the release of small particulates from vehicle tyres, brake discs and road dust, are major causes of air pollution. The latter is not significantly reduced by a switch to electric vehicles³³, so the best option is a significant change to more active travel (i.e. walking and cycling) and much less use of private cars. **Educational establishments could therefore take a leading role in showing the importance of active travel in reducing air pollution, and so improving the health of their students.**

The Air Quality Action Plan promised in Section 6 of the draft Strategic Plan does, of course, need to look at the issue of air pollution more generally than that caused by

³⁰ The [School Streets Initiative](#) also links to a number of other helpful resources

³¹ See the [Report to Prevent Future Deaths](#) made by the coroner, Philip Barlow, investigating the death of Ella Kissi-Debrah

³² As reported by [The Guardian on 21 May 2021](#). Air pollution obviously causes other health problems too, and for people of all ages. For example, this article refers to an earlier article about air pollution nanoparticles linked to brain cancer.

³³ See the paper on [The implications of electric vehicle uptake for non-exhaust emissions](#) in the OECHiLibrary

cars taking staff and students to and from schools and other educational facilities. But waiting for that future Plan should not be an excuse for delaying changing anything in the meantime.

It's important to ensure that young people at educational establishments understand enough about the climate and nature emergencies, so that they are more likely to make good decisions at later points in life. This would, of course, need to be done very sensitively given that many young people, including those who have taken part in the school climate strikes, have shown that they do have a very good understanding of these issues, so conversations must very much be two-way.

Actions that are developed do, though, need to include commitments to deliver them and target dates by which this needs to be done. The target of 2023 in this Action seems to only apply to having a plan. Targets for delivering action are also needed.

The Council should also use its leadership role to ensure that the type of actions indicated above for schools are also encouraged, promoted, supported and so on more generally, and in this respect, there are, of course, links to a number of other actions under this Theme of the draft Strategic Plan. Indeed, **action on healthy and more climate friendly eating could be rolled out more generally**, for example as has been done in Bristol under an annual awards scheme³⁴ to influence the sustainability of food businesses in the area.

h) C1.8 - During 2021 for all non-Council managed schools and educational facilities to be contacted and encouraged to put their own Climate Action Plans in place by 2023.

The leadership role that the Council takes regarding non-Council managed schools and educational facilities should aim to encourage, persuade and, where possible, require the same actions as indicated in our comments on Action C1.7 for managed schools and educational facilities.

i) C1.9 - To support, promote and raise awareness of the use of sustainable transportation and ensure resources are available to allow communities to make transport changes that do not rely on polluting private transportation.

FoE research indicates that in Hillingdon, 40% of commuter journeys are made by public transport, cycling and walking³⁵. They say that a target for 2030 should be to almost double this figure.

Much more use of sustainable transportation is clearly essential so we welcome this Action. But this Action should lead to far less reliance on private cars. **Promotion and raising awareness of sustainable transport must therefore be coupled with action that would prioritise active travel (i.e. walking and cycling) and public transport**, along with good provision for disabled people who use mobility scooters or wheelchairs.

³⁴ See the [Bristol Eating Better Award](#) offered by Bristol City Council

³⁵ See footnote 3

For example, 20mph speed limits on at least all residential roads and in town centres would make walking and cycling much safer, and main roads should have segregated cycleways and wide pavements. Action which sounds closer to delivering this seems to be promised on page 14 of the draft Strategic Plan with the commitment “*the Council will take action to improve opportunities for sustainable transportation within the borough, i.e. through the promotion of new cycle routes and challenging TFL to improve bus services*”. Challenging TFL to improve bus services could be really helpful in order to reduce car use in Hillingdon. This may include better interchanges between bus routes, and between bus and tube/rail lines within the Borough. The Council does, though, need to ensure that it has worked with residents and employers to identify the routes and times where improved provision would be beneficial. Part of the solution may then require action to prioritise buses on roads over cars where this is possible.

An essential requirement to maximise the use of public transport is step free access for disabled people, people with other mobility problems, heavy luggage and pushchairs. There is a temptation for all these groups to go by car owing to the lack of step free access at London Underground and other stations. Action on this issue has in the past been supported by all of the MPs representing constituencies in Hillingdon³⁶ but the pace of change since then has been very slow. The Council therefore needs to use its lobbying power to engage with those responsible for stations to **ensure that all stations within Hillingdon are made step free within the next five years.**

We are somewhat puzzled by the reference in Action C1.9 to “*ensure resources are available to allow communities to make transport changes*” as communities cannot alter road layouts, constrain the use of road space round schools, and so on, which may be an important part of what should be done in a particular area. Involving communities in decisions is, of course, important, and ensuring that there are resources available to deliver on those decisions, but the Council must not devolve action to those who do not have the powers to act. It may be that this part of the action relates to things like promoting car-sharing by working with major employers in the area. Currently only 6% of commuters share their car when commuting in Hillingdon, according to FoE research³⁷. Action of this sort that has, for example, been taken by Warwickshire County Council³⁸ could certainly be useful where working with TFL does not deliver all of the bus routes that might be needed.

Whilst action that prioritises sustainable transportation, and action to persuade people to give up use of cars where alternatives can work, are clearly important, the Council can also take steps that might deliver benefits where the latter has not been very successful. For example, a workplace car parking levy would also be possible,

³⁶ As indicated in the MyLondon article of June 2014 “[Paralympian Natasha Baker and Conrad Tokarczyk get backing of Hillingdon MPs for step-free access campaign](#)”

³⁷ See footnote 3

³⁸ Information about car sharing in Warwickshire has been published as a [case study by Friends of the Earth](#)

such as the one successfully introduced in Nottingham³⁹. Or the Council could introduce differential charges for car parking to deter use of the most polluting vehicles such as SUVs. Indeed, mechanisms that ensure that the small number of people who generate far greater emissions than the average person are encouraged, persuaded, deterred or even penalised for their actions would probably be seen as fair by many people.

We have indicated the importance of increasing sustainable transportation in order to help reduce air pollution in our comments on Action C1.7. We have noted that electric cars still cause air pollution because of the small particulates released from vehicle tyres, brake discs and road dust, albeit that there are no emissions from an internal combustion engine. Action which increases sustainable transportation, but which leaves the use of cars changed very little is therefore still a problem.

The aim should be to end up with much reduced use of cars in Hillingdon, but the right infrastructure for electric cars that some will still use is, though, important. Corporate Climate Commitment 1 under the Vision in the draft Strategic Plan includes “*creating the infrastructure for charging electric vehicles*”. Ensuring that the right infrastructure is in place in all parts of the Borough is, of course, very important. Research by Ashden based on FoE’s 50-point Plan (both mentioned earlier in this response) identifies this as the fourth highest priority area for carbon reduction⁴⁰.

The needs of residents who live in flats or properties without drives, so that charging vehicles at home is not possible, must be taken into account. In this respect, we believe that people who need to rely on public charging points for electric cars because they are unable to have their own private charging point are penalised by the VAT system in what they must pay. The Council therefore needs to lobby the Government in this respect or find alternative solutions so that the most vulnerable people are not penalised if they have an electric car.

At the same time, it is important that the increased provision of private charging points does not rely on unnecessary paving over of front gardens. There should be regulation regarding how much of a front garden can be paved, with effective enforcement to protect the interconnected green spaces that front gardens help to deliver.

A move towards electric vehicles is, of course, not just an issue relevant to private cars. For example, buses and taxis in Hillingdon should also all be required to be electric and the Council should work with TFL to ensure that this can be delivered as soon as possible.

The impact of air pollution is likely to be one of the factors that gives rise to a significant difference in life expectancy for people living in some wards in the south of Hillingdon compared to those living in the north⁴¹. Although, as we have said,

³⁹ Information about a workplace parking levy in Nottingham has been published as a [case study by Friends of the Earth](#)

⁴⁰ See footnote 2

⁴¹ Data on differences in [Life Expectancy](#) has been published by the Council

there is still a release of small particulates from electric vehicles, there is, of course, no pollution due to vehicle emissions from such vehicles. **Ensuring, without further delay, that all buses and taxis are electric is therefore vitally important in the south of the Borough in particular as that will reduce air pollution and increase life expectancy.**

The use of commercial vehicles also needs to be considered as part of a sustainable transportation policy and appropriate actions devised to encourage or require changes. In this respect, setting up an area-wide distribution centre as we have indicated in our comments on Action C2.6 could lead to the last leg of deliveries to both business and residents being by more sustainable forms of transport. For example, Southampton City Council has formed a partnership to set up a Sustainable Distribution Centre⁴² which is intended to support the green city goals by reducing the flow of freight vehicles in the city. It is also likely to provide cost and time savings for businesses.

⁴² The [Sustainable Distribution Centre](#) involves a partnership between Southampton City Council and Meachers Global Logistics

Theme C2: The Council's Own Operations

Overview

We welcome the Council's recognition that, although it has reduced CO₂ emissions across its own operations by an impressive amount in a little over 10 years, action must continue apace to deliver carbon neutrality by 2030. However, net zero carbon by 2030 should not be seen as the end result, and actions needed to deliver it should be formulated with the aim of reducing emissions to zero in the future rather than just net zero. **A net zero commitment that relies on unrealistic possibilities for carbon offsetting would not be an acceptable end point.** Even while a net zero target is being aimed for, this must therefore be coupled with ambitious targets to reduce carbon emissions each year. We say more about offsetting under Theme C7 in particular.

The inclusion of **procurement by the Council under this Theme is important, because that can help how effective the Council can be as a leader of the community** as set out for Theme C1. Procurement is, though, only one aspect of Scope 3 emissions⁴³. Scope 1, 2 and 3 emissions should all be considered under this Theme. We agree, as indicated in the Camden Climate Action Plan⁴⁴, that measuring Scope 3 emissions can be particularly complex, but the Council should still ensure that the scope of this Theme is wide enough to encompass actions that will help reduce them.

Ensuring that the need to address the climate emergency is taken into account in all decisions that the Council makes is equally important. But we are concerned that the way the action on this is currently presented could mean that **consideration of the impact of the climate emergency might not necessarily lead to any modifications to reduce CO₂ emissions.**

We are also concerned that the Council may sometimes excuse itself from action due to a lack of funds. For example, the discussion below this Theme indicates that meeting the target that has been set will require "*a carefully coordinated use of the funds available*". We obviously know that the Council's budget is not limitless, and that money from central Government to councils is much less generous than it used to be, so the Council does not have unlimited resources to deliver any of the actions in this draft Strategic Plan. But we do very much hope that the **Council will explore any funding sources that it may be able to access**, join with other local authorities when appropriate to lobby the Government for more funding⁴⁵, and consider whether it is possible to raise money in the Borough specifically to deal with the climate emergency, such as from a workplace car parking levy.

⁴³ [Compare your FOOTPRINT](#) explains how the Greenhouse Gas Protocol puts emissions into 3 categories, with Scope 3 being indirect emissions from the activities of an organisation that occur from sources that it does not own or control, such as emissions associated with business travel, procurement, waste and water.

⁴⁴ See page 11 of the [Camden Climate Action Plan 2020-2025](#)

⁴⁵ Such as through London Councils as we have indicated in our general comments

One possible source of funding could be from the introduction of licensing of the private rented sector to cover the enforcement costs of ensuring compliance with minimum energy efficiency standards. Such compliance is an important action that we have highlighted in our comments on Action C1.6. We believe that such licensing has been introduced by Newham Council⁴⁶ so this could certainly be another approach for raising funds to address the climate emergency.

Comments on specific actions under Theme C2

a) C2.1 - Council operational building stock to be accredited as carbon neutral by 2030

The promise in Action C2.1 seems to apply only to corporate council property. Corporate Climate Commitment 2 in the Vision, namely that “*We will invest in energy saving measures across the property portfolio. This applies to public access buildings and sites where the Council pays for the energy supplies ...*” is also rather limited in scope. As we have indicated in comments about the actions in Theme C1, specifically regarding Action C1.6, the needs of fuel poor households in council housing must be addressed. The Council does, though, have a more general obligation to take action regarding council housing. **Action C2.1 should therefore apply to council housing too so that it is also at least carbon neutral (i.e. net zero), and energy costs for those living in it are reduced.**

Page 10 of the draft Strategic Plan indicates that energy efficiency for council housing has already been partially addressed by “*loft and cavity wall insulation, upgrades through reactive works upgrading inefficient communal lighting to LED and reducing the energy demand for homes*”. But it is not clear how comprehensive it has been, and it does not seem to have covered the type of heating in council housing. Eco-heating options such as heat pumps need to be fitted where possible. **The Council should therefore ensure that it has acted comprehensively on all council housing.**

There is a clear cross-over between this Action and Action C1.4, which relates to the “greening” of residential properties and businesses, and is essentially an extension of what is being recommended here for Council property (and which we are recommending should extend to council housing). Retrofitting all buildings with energy efficient measures so that they have an EPC rating C, or higher wherever practicable, should be the aim. These two Actions taken together must address the fact that, as mentioned in C1.4, according to FoE research, only 38% of Hillingdon homes are well-insulated.

Schools and other educational facilities managed by the Council should also be covered by this promise to be carbon neutral by 2030. There can, of course, be separate actions for corporate council property and other property owned or managed by the council, but **the commitments for all council property should have the aim of zero carbon by a specific date.**

⁴⁶ See information about [Rented Property Licensing](#) in Newham

We welcome the fact that there is at least a target date for Action C2.1, although this is only for reaching carbon neutrality and not going beyond that to aim for zero carbon. But **yearly targets are important too to ensure that steps are being taken that are likely to deliver the action.** Details about how carbon neutrality will be measured are also important. Part of any measure of carbon must, of course, include the source of energy supplies to Council buildings and so there seems to be overlap between Action C2.1 and Action C4.1. Indeed, it would seem that Action C4.1 is an essential part of delivering Action C2.1, so there needs to be effective joining up rather than an attempt to deliver these actions separately.

Use of locally produced sustainable energy in all Council owned buildings would be the best solution for necessary energy supplies. The purchase of any extra power needed should then be from companies using sustainable sources. We are concerned by what is said in other parts of the draft Strategic Plan about carbon offsetting and how this might be used and measured to reach the goal in Action C2.1 and some of the other actions. We discuss this further in our comments on Themes C4 and C7.

b) C2.2 - By 2030 significant progress will be made to ensuring the Council's fleet will be powered by the cleanest available technology

Although the inclusion of a target date is good, this does not actually deliver anything very meaningful as currently worded, when the test is only that there should be "significant progress" by this date. **A rapid transition of the Council's own fleet to electric vehicles is what is actually needed.** This Action should be strengthened to require all of the council's vehicles to be powered by sustainable energy, with both interim and final measurable targets for this Action.

c) C2.3 Ensure all corporate decisions, particularly regarding estate management and property disposal consider the impact of the climate emergency

Corporate decisions need to be taken after considering the impact of the climate emergency, but then may need to be adjusted where necessary to do as much as possible to address the climate emergency. "Considering the impact" as indicated in Action C2.3 is therefore only the first stage of what needs to be done. The statement on page 8 of the draft Strategic Plan that "*We want services to see carbon emissions in the same way as our financial budgets and for everyone to take responsibility*" actually reads better than how Action C2.3 is expressed. But in order to deliver what is required if action is really going to help address the climate emergency, decision making by the Council needs to be properly joined-up regarding how the climate impact of decisions is assessed and accounted for. **A starting point would be to require all proposals to be accompanied by a climate and nature impact assessment.**

As well as seeming to consider the impact without necessarily changing anything under this Action, the scope of the reference to "corporate decisions" is not clear. Is this limited to decisions about the council's own buildings and vehicles mainly, or

does it include decisions about other important matters, such as planning applications, road design, where to plant trees and so on?

For example, proposals on new housing developments should identify the climate change and nature impact of the homes themselves, but also whether the proposed location would force people to use cars to get to work or access services. With this information councillors can make better informed decisions. Maybe some of what is needed would come under one of the other Themes in the draft Strategic Plan, but it is obviously really important for all decisions to take proper account of the climate and nature emergencies. We very much hope that future more detailed plans promised in Section 6 of the draft Strategic Plan will look at how decision making should be changed across all of the various Council areas in order to deliver this.

We realise that Hillingdon Council, like other councils, will over time produce numerous strategies and plans, some of which are legally required (e.g. a Local Plan) and some that are not legally required (for example, a tree strategy). **All future plans and strategies produced by the Council should be developed and aligned with the need to address the climate and nature emergencies.** Many of the specific commitments in the draft Strategic Plan are relevant to this, but there does not seem to be any overriding commitment to align all council statutory and non-statutory plans, policies and guidance this way.

d) C2.4 Introduce a green Council staff travel plan that encourages and promotes less business travel and commuting and the increased use of low or zero carbon travel methods

A green Council staff travel plan is a good idea, but the plan could do more than just encourage and promote less business travel and commuting by private car. For example, car parking levies could be introduced to make the use of private cars for travel to work less attractive, as long as practical alternatives exist. This is, of course, an idea that could be applied to workplaces more generally as indicated in our comments on Action C1.9. Indeed, **the Council's community leadership role needs to be used to deliver action that would mean less business travel and commuting by private car more generally**, with the Council being prepared to use any powers it has to force changes in behaviour in some cases where encouraging and promoting it does not lead to much change.

Specific actions aimed at Council staff should, of course, be developed after involving staff in making decisions about what they should be, just as we have indicated for actions more generally in our comments about Theme C1. Actions also need to be linked to supporting and improving sustainable transportation as we have indicated in our comments on Action C1.9.

e) C2.5 To investigate opportunities for energy generation from renewable sources on Council operational building stock and on land it owns

Research by Ashden based on FoE's 50-point Plan (both mentioned earlier in this response) suggests that the **two highest priority actions** in FoE's Plan are to:

- identify areas suitable for renewable energy in the Local Plan

- invest in the development of renewable energy and energy storage⁴⁷.

Despite the high priority, FoE research indicates that Hillingdon is lagging a long way behind similar council areas in its renewable energy generation. (Hillingdon currently produces **6.5 GWH** renewable energy per year, compared with similar local authority areas producing over **176 GWH**.⁴⁸) So this action is of immense local importance.

There is also a clear link between this Action and Action C4.1, which relates to ensuring and certifying renewable energy supplies. The more opportunities the Borough takes to generate its own electricity locally, the less it will have to certify from external sources. It will also be able to generate energy much closer to the point of use, thus avoiding electricity loss in transmission.

Again the commitment to *investigate* opportunities for energy generation from renewable sources is welcome, but needs to be followed by *acting* on what is possible after the investigation. Section 6 of the draft Strategic Plan shows “Identifying Opportunities for Renewable Energy Projects” as one of the plans under the future Corporate Operations Action Plan. This must be expanded to ensure that it is followed by actual installation of energy generation from renewable sources in appropriate places.

HFoE’s subgroup on Energy has an abundance of ideas for possible approaches to solar photovoltaics, wind and hydro power, and has researched possible sources of funding for local sustainable energy projects. The group would welcome Council support to pursue these ideas.

Action C2.5 is limited to council operational building stock and land it owns. We have already suggested in our comments on Action C1.7 that solar panels should be considered on the buildings of schools managed by the Council and even this sounds as though it is outside the scope of Action C2.5. All council buildings, including schools and council housing, should therefore be within the scope of Action C2.5. In addition, **any new Council buildings, including new council housing, must be fitted with renewable energy sources wherever possible.**

However there needs to be **action that identifies suitable buildings and land more generally in the Borough for energy generation from renewable sources.** This could be part of what is included in the Local Plan or otherwise. Actions that might actually deliver such installations then need to be developed, obviously working collaboratively with the relevant parts of the community in Hillingdon.

In this context it is worth mentioning the Mayor of London’s initiative Solar Together⁴⁹, which encourages neighbours to get together on purchasing solar photovoltaics (PVs) for multiple houses at a preferential rate.

Exploring and expanding opportunities for energy storage must also be part of this Action. Batteries are clearly an important part of how electricity from renewable sources can be stored. How these can work best for individual homes with, say,

⁴⁷ See footnote 2

⁴⁸ See footnote 3

⁴⁹ See [Solar Together London/Hillingdon](#)

solar PVs, as well as more generally, needs to be explored and rolled out. This also extends to the batteries of electric vehicles, and how and when they should be charged. Those batteries could sometimes be used in reverse to provide energy for a building when there is no output from a renewable source, or feed electricity into the grid⁵⁰.

Storage of energy from renewable sources is, of course, an issue where there is much work being done to come up with new and better solutions. For example, Ashden has in the past given an award to Highview Power that is developing storage using liquid air⁵¹. Using electricity from renewable sources to produce hydrogen (by electrolysis of water), that can then be stored and used later, including to produce more electricity without emitting carbon, is a technology that could provide good solutions in the future. Hydrogen produced from fossil fuels is not, however a sustainable or renewable source of energy⁵².

f) C2.6 The procurement of all new Council equipment and services will be measured against the objectives of this strategic plan

Research by Ashden based on FoE's 50-point Plan (both mentioned earlier in this response) suggests that the third highest priority action in FoE's Plan is to ensure that the local authority supply chain is minimising carbon emissions, through its approach to procurement⁵³.

Aligning all the Council's statutory and non-statutory plans, policies and guidance with the objectives needed to address the climate and nature emergencies is clearly important and this should definitely include procurement by the Council. Action C2.6 does not, however, actually seem to require such alignment. Procurement of Council equipment and services might be measured and found not to help deliver the objectives of the draft Strategic Plan, but Action C2.6 as written doesn't require that anything should actually be done as a result. The discussion below the specific commitments under Theme C2 indicates that "*We also commit to a procurement strategy that will aim to ensure our suppliers' carbon emissions are more clearly understood and are factored into Council decision-making on the purchasing of supplies and services.*" But this also falls short of saying, for example, that procurement might need to be changed where suppliers' carbon emissions are not being addressed in an acceptable way.

The details of actions that should apply to procurement by the Council therefore need to be developed much more than seems to be suggested by Action C2.6. As we have indicated in our general comments on this Theme, other Scope 3 emissions should also be considered. (Reducing business travel, as indicated in Action C2.4, is, of course, relevant here.) **Procurement and other activities by the Council which lead to Scope 3 emissions should be reviewed and changed where**

⁵⁰ The Government has funded research into [vehicle to grid \(V2G\) technologies](#)

⁵¹ See Ashden winners: [Highview Power/Cheap and green energy storage](#)

⁵² FoE published an article in April 2020 on "[The role of hydrogen in our low-carbon transition](#)" that explains these issues further

⁵³ See footnote 2

possible to deliver measurable benefits to address the climate and nature emergencies.

Some of these developments could, of course, lead to improved environmental performance by private businesses supplying goods and services to the Council and so help with the goal of making the whole Borough zero carbon. For example, serious consideration should be given to adoption of a circular-economy where procurement policies require recycled materials from suppliers so that no resources are wasted. Also, deliveries to the Council could be required to be by electric vehicle. Indeed, greener deliveries across the Borough more generally could be encouraged and promoted by setting up an area-wide distribution centre as indicated in our comments on Action C1.9.

Theme C3: Building Better Places

Overview

We welcome the recognition of the need to adapt policies about planning and developments in order to reduce the carbon footprint of new building. Actions under this Theme in particular could be part of, or linked to, **a sustainable development policy that includes supporting reskilling, retraining and research to accelerate the reduction of carbon emissions in the Borough.** (Many actions under other themes are, though, also relevant to sustainable development and we have in particular already mentioned skills, training and research in our comments on Action C1.4.) As well as some rebalancing of the economy in line with commitments on climate change, such support would, of course, also help with recovery from the Covid-19 pandemic.

However, actions need to be good enough to make a real difference to meeting the challenges of the nature and climate emergencies, even if meeting them might be difficult. For example, **major new developments could be required to be better than just zero carbon with innovative approaches to deliver this being encouraged.** The Council needs to be really ambitious if it wants to make a real difference in Hillingdon. It could look at what some other councils are doing and aim to develop commitments even better than in the London Plan. As well as the nature of buildings and how they use energy, this Theme does, as has been recognised in the proposed actions, link into decisions about transport and green spaces. On the latter, we have already noted that the Vision in the draft Strategic Plan is *“To become the greenest London borough, to protect and enhance the environment, and to provide a brighter prospect for future generations.”* If this is to be delivered, it will be very important to **ensure that developments always enhance the environment and nature**, and this is not clearly delivered by the proposed actions.

Even if the development plan, individual planning permissions and so on require high levels of energy efficiency for buildings, the Council does need to ensure that this is delivered in practice. Residents and others can, of course, submit comments on planning applications and this can be helpful sometimes to ensure that applications meet expectations on energy efficiency and other matters that are important. However, we have been looking at how we as a group might better engage with this process to try to ensure developments that are approved are in line with the various matters we have raised in our comments on this draft Strategic Plan. But we are currently finding it very hard to identify those applications where important issues are most likely to arise, and so we would welcome Council action to improve how planning applications are advertised.

Building standards, and any other specific matters that have been required as a condition for granting planning permissions, for both new buildings and renovation of existing buildings, do, of course, need to be properly enforced.

There must be strict inspection at all appropriate stages of construction so that, for example, the right types of insulation or the correct quantities are used, and builders

are not able to cut corners and their own costs, leaving homeowners to then pick up the bill for higher heating costs in the future.

We note that the London Plan says that “*Boroughs should ensure that all developments maximise opportunities for on-site electricity and heat production from solar technologies (photovoltaic and thermal)*”⁵⁴. None of the actions under this Theme specifically mention renewable energy, but it would be important for the Council to **require the installation of renewable energy sources in private new developments** (as well as doing the same for public ones as indicated in our comments on Action C2.5).

Comments on specific actions under Theme C3

a) C3.1 To use the development plan system to ensure all new major development will be zero carbon

We welcome the commitment to use the development plan system to impose obligations on all major new development that will help address the climate emergency. This commitment does, though, need to be as strong as possible. The discussion below the actions for Theme C3 says that “*Innovative approaches to new development mean it doesn’t just have to be zero carbon but can assist with providing a net reduction*”. We couldn’t agree more and so very much hope that the Council will require all private new development, both major and minor, to go beyond the requirements in the London Plan and Building Regulations as soon as possible.

The aim should be that buildings in new developments meet Passivhaus standards, or level 5 or 6 of the Code for Sustainable Homes⁵⁵; a zero carbon assessment is not sufficient as that could mean that the building is not highly insulated and energy efficient, so still requires significant energy to heat even if the energy is from renewable sources. New buildings should be designed so that they require only very low energy use for both heating and cooling. No new home should, of course, be connected to the gas-grid; instead electric heating should be used, preferably heat pumps. (Not all new homes will be suitable for heat pumps but nearly all should.) These high standards should be implemented as soon as possible and then effectively enforced through strict inspections. Where the Council lacks the legal powers to act this way, it should lobby the Government to make urgent changes to the law⁵⁶.

Where housing is being built on the Council’s land, housing that could be social housing for rent or otherwise of course, then extreme energy efficiency must be required. **There should be no exception to a requirement for all buildings on the Council’s land to meet Passivhaus standards, or level 5 or 6 of the Code for Sustainable homes.** The Passivhaus standard delivers homes that require very little heating for people to keep warm and so also delivers big benefits where more vulnerable people who are fuel poor live in them. A housing development in

⁵⁴ See paragraph 9.2.3 on page 343 of the [London Plan](#)

⁵⁵ See the [Code for Sustainable Homes](#) – technical Guide, published by the Government in November 2010

⁵⁶ Acting with other councils if appropriate, such as through London Councils as we have indicated in our general comments

Dartmoor National Park⁵⁷ is an example of how adopting the Passivhaus standard for new affordable homes can deliver benefits if people who are fuel poor live there.

As well as standards for the buildings, **the development plan should also ensure that sustainable transportation is prioritised**. Reducing the need to use a car should be delivered by ensuring that new homes are located close to frequent and convenient public transport and have good quality provision for walking and cycling to shops and other services.

The Council should have the aim of at least matching the best approaches that other local authorities are taking when developing Action C3.1. Standards higher than current national standards for privately built new homes would avoid the need for costly retrofits to buildings and adaptation of transport options in the future. Higher standards have, for example, already been developed by Cambridge City Council in its design guide for privately built new homes⁵⁸. This guide covers building design and transport issues, and encourages innovation.

b) C3.2 To consider new planning policies to ensure all non-major new development is also zero carbon

We agree that new planning policies should apply to non-major new development too, but **these should also deliver results that are better than zero carbon**.

c) C3.3 To ensure no new development is built in high and medium flood risk areas unless absolutely necessary and only then when flood risk management is properly understood and mitigated

Every new development should be flood resilient and so the approach for planning decisions should be at least as good as the approach indicated for the Council's own land and property in Action C6.2. Considering the need to make space for water as indicated in Action C6.2 should therefore underlie how Action C3.3 is developed. Joining up this Action with Action C6.2 may make sense, but it is important to at least **ensure that flood resilience applies to private developments as much as those on Council land**.

d) C3.4 To ensure all new development contributes to responsible environmental performance

It is not clear what would be delivered by Action C3.4 because we don't understand what is meant by "responsible environmental performance". The comments that we have provided on Action C3.1 are, though, relevant to any type of environmental assessment and so are also relevant to Action C3.4. But the starting point should be to consider whether there should be new development in the particular location in the first place. **Protecting existing local green spaces, the green belt and locally designated nature sites in Hillingdon should be a priority**.

It is very disappointing to see how much of the London green belt has been encroached on for building houses, especially when there is little evidence that any

⁵⁷ The Exeter Daily [reported in June 2017](#) on an Award for Planning Excellence that this development received

⁵⁸ See the [Cambridge Sustainable Housing Design Guide](#)

of these developments are delivering any affordable homes⁵⁹. We very much hope that the Council agrees with us that this is not a good outcome. Another problem is that too many front gardens, both for new building and extensions to existing ones, do not make space for nature. The extent of paving in front gardens should be clearly limited when planning permission is granted. Green spaces also need to work for the community and so ensuring that public access to them is protected and improved is also important. Indeed, **development decisions should prioritise the creation of more green spaces with good public access in the south-east of the Borough in particular, where residents are not currently well served with such amenities.**

How developments affect biodiversity is also important. **A commitment for developments to deliver biodiversity net gain as in the London Plan should be the starting point.** Indeed, the first policy in the Government's 25 year environment plan⁶⁰ is "*Embedding an 'environmental net gain' principle for development, including housing and infrastructure*". Biodiversity and environmental gains must be measured by both the Council and developers using the best metrics and the Council must ensure there is full enforcement of what has been agreed. The starting point must be a proper assessment of what is already there so that any biodiversity losses from the development can be assessed. **There must, then, be compensation for those losses plus a net gain of biodiversity in addition to the compensation.**

Moreover, the requirement to deliver both any compensation for losses and a gain must be on a reasonably short timescale, so that developers are not able to put off what they must do for many years. Finally, the importance of joining up spaces for nature must be recognised⁶¹, such as by leaving space in developments for wildlife corridors, and suitable provision must be included in all new developments.

It is critically important that conservation of, and improvements to, biodiversity in practice must be properly assessed. In this respect, The Wildlife Trusts has published a helpful guide⁶². The Wildlife Trusts work closely with many councils across the country, providing advice and responding to planning applications. They also work together with developers and councils to ensure that housing developments enhance, rather than harm, nature, so the Council may want to explore the options for working this way. Another possibility would be to explore working with those with expertise in the area of ecology at Brunel University London about how to make the best decisions for Hillingdon in planning decisions and also more generally about green spaces.

e) C3.5 To ensure all new development contributes to the sustainable management of transportation

It is not clear what would be delivered by Action C3.5 as it is not clear to us what is meant by "sustainable management". We have already indicated in our comments

⁵⁹ See the report '[Safe under Us?](#)' published by the London Green Belt Council in January 2021

⁶⁰ See [A Green Future: Our 25 Year Plan to Improve the Environment](#)

⁶¹ See for example the blog [Making Space for Nature – 10 years on](#) published by Natural England on 16 September 2020, which highlights the lack of progress in providing "more bigger better and joined" spaces for nature

⁶² See [The Wildlife Trusts Biodiversity Benchmark](#)

on Action C3.1 that reducing the need to use a car should be delivered by ensuring new homes are located close to public transport, and have good quality provision for walking and cycling to shops and other services. **All new developments should be located and designed with the aim of reducing the need to own and use a car.** For example, if travel to and from work, educational establishments and so on requires a car because they are too far away, and the public transport links are inadequate, then the development should not go ahead.

This should, of course, apply to all developments, and not just homes. Any new retail or leisure complex, business park, educational establishment and so on should not be approved if it is not easily accessible without a car.

f) C3.6 To ensure that any trees lost are compensated for by offsite replanting

The starting point for trees in any decisions about development should be that there should be no loss rather than just requiring compensation as in Action C3.6. Moreover, where it is really impossible to retain a tree, the priority should be to require compensation onsite rather than offsite. The London Plan requires the following as part of Policy G7:

“Development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.”

The Council should adopt an action at least as good as this. Any compensation where a tree is lost does, of course, have to be assessed properly, preferably to ensure no loss of carbon, but even better to deliver a net gain of carbon, with the assessment being met on a reasonably short timescale. Replacing a mature deciduous tree with a single young tree of any sort is clearly far from satisfying such an assessment.

Theme C4: Using Clean and Green Energy

Overview

Compared to other themes there is only one action under this Theme. Whilst it relates to an important issue, namely the Council's own energy supplies, we are disappointed that there are no actions regarding the whole community in Hillingdon. (We realise that some Actions under Theme C1 do involve looking at clean and green energy, but these could end up too disjointed as they are not part of a theme specifically about this issue.)

Ideas that we think should be at least explored regarding clean and green energy for all parts of the community include community/district heating, encouragement for the installation of solar photovoltaic panels on both residential and non-residential properties through certain incentives or grants, and a focus on the reduction of carbon emissions by everyone rather than carbon offsetting.

Regarding district heating, we understand that the Council operates some networks. However, these networks are often inefficient. They do, though, provide opportunities to reduce carbon emissions by implementing new technologies or improving how they operate. **The Council should therefore review all heat networks/district heating they have in operation and then implement any changes that would reduce carbon emissions.**

Street lighting is another issue where the Council should take action as this is clearly energy used by the Council. There does not, however, appear to be a specific action relating to that under any of the themes. Corporate Climate commitment 2 does, though, read as though changes to LED street lighting will continue, which we welcome.

Whilst changing to LED street lighting is good, this lighting does, though, often spread light far too widely, and the light pollution can be very damaging to insects and other wildlife. Using shades to control where the light is emitted therefore needs to be explored. Indeed, turning the street lighting off at some point in the night, at least in some areas, could also be explored, taking safety considerations into account, of course. Moreover, in order to reduce the energy needed as well as reduce light pollution, motion sensors could be added for street lighting in some areas so that they only turn on when needed.

In addition, using the kinetic energy of footfall⁶³ might be possible to produce lighting in high footfall areas. Ground heat pumps to produce lighting in parks⁶⁴ is another option that should be explored.

Possible ways to generate energy from renewable sources more generally is important and, as we have indicated in our comments on Action C2.5, this should be explored for more than the Council's own buildings and lands, with energy generated then used for more than just the Council's own operations.

⁶³ See for example [Pavgen](#)

⁶⁴ See for example the information about [Powering Parks](#) by Possible

When making decisions about renewable energy sources, it is important not to consider energy produced from burning biomass as a sustainable energy source. Burning biomass, including incinerating waste, is not a clean and green way of producing energy. A recent article published by FoE⁶⁵ explains more about the problems where councils are making such assessments.

As we have indicated in our comments on Theme C3, the installation of renewable energy should also be required within private and all public sector developments. **The aim for the whole community as well as for Council operations should be to produce energy as near to the point of use as possible to avoid energy loss in transmission.** Exploring all possibilities for producing sustainable energy within the Borough should therefore be a priority. Storage of sustainable energy produced also needs to be addressed. We say more about storage in our comments on Action 2.5.

Some of the actions under Themes C1 and C2 should, of course, lead to a reduction in energy consumption, so further actions that are developed under this Theme about what type of energy is used need to be joined up the right way with relevant actions under other themes.

The discussion below the single action for Theme C4 refers to carbon offsetting. Carbon offsetting is, of course, further discussed under Theme C7. We do accept that offsetting may sometimes be necessary, but it should very much be the last resort both for the Council's own operations and the community more generally. **The Council therefore needs to show leadership in this respect and not act in ways that make offsetting look like an easy or the best solution.**

We note that the London Plan makes provision about energy⁶⁶, including to say that *“the Mayor will work with boroughs, energy companies and major developers to promote the timely and effective development of London’s energy system (energy production, distribution, storage, supply and consumption)”*. This sounds very much like something that the Council should engage with. This could link into a heating and energy efficiency strategy for the whole community in the Borough that we have suggested in our comments on Action C1.4.

Comments on specific actions under Theme C4

a) C4.1 To ensure and certify that the Council secures energy supplies from low or clean forms of generation by 2030.

An action about the Council's energy supplies is important and it is good that delivery is to be certified. **We welcome the commitment indicated in the discussion below this Action to continue to purchase all electrical energy from certified renewable sources.** There are many energy companies that supply all their electricity from certified renewable sources, so it is assumed that the Council are currently obtaining their electricity in this way and will continue to do so.

⁶⁵ See [“Are Incinerators Good for the Environment?”](#) published on 31 March 2021

⁶⁶ See Policy SI 3 Energy infrastructure starting on page 363 of the [London Plan](#)

For heating, the discussion below this Action indicates that *“the gas we use in our buildings is not considered to be a renewable source of energy. To compensate for this, we must install low carbon or zero carbon heating sources in as many council owned buildings as possible.”* **We very much hope that this means that there will by 2030 be very little reliance on fossil fuels and that action will continue beyond 2030 to remove any residual use of fossil fuels.** As we have already indicated, **carbon offsetting should only be used as a last resort.** We provide more comments about carbon offsetting under Theme C7.

There appears to be a significant link between this Action and Action C2.5, which looks at the possibilities for energy generation on Council land. If the Council succeeds in generating its own renewable energy for electricity, then that will go a long way towards ensuring that a greater proportion of electrical energy at least is under the Council’s control, and is generated close to the point of use.

We are mentioning fracking under this Action because, although not a directly relevant issue for Hillingdon, the Council can still ensure that it does not purchase any energy from suppliers using fracked fuel.

Beyond the **use** of clean and green energy, the council should be moving towards **disinvestment (divestment) of the council’s own funds, and in particular of council pension funds, away from fossil fuel companies**, including fracking companies. We have been told that this is outside the scope of this Strategic Plan, but surely it is not consistent to be aiming for a carbon neutral Council by 2030, while still investing heavily in the fossil fuels that will have been displaced within the Council? Currently, according to Divest,⁶⁷ Hillingdon invests £41 million, representing 3.8% of its pension fund, in fossil fuels, compared with a UK average of 3%. Re-investment in renewable energy projects in particular would be welcomed.

⁶⁷ See UK Divest information [“Divest your council”](#)

Theme C5: Waste Management

Overview

The discussion under actions for Theme C5 indicates that “we must first encourage the avoidance of waste wherever possible”. This is really important. **The Council’s aim should be to send zero waste to landfill or incineration.** We do recognise that this is a difficult ambition to meet, and no councils in the UK have, we believe, so far achieved this. But actions that clearly work towards this goal with good and challenging interim targets are really important. **The recognition in the draft Strategic Plan of the waste hierarchy with the first three measures being Avoid, Reduce and Reuse is therefore welcome,** and crucial if waste is to be reduced enough to reach zero waste to landfill or incineration.

The next stage in the hierarchy, namely **Recycle**, is, of course, already rolled out for many types of waste in Hillingdon, but **recycling needs to be underpinned by a policy of ensuring that this happens in the UK wherever possible.** We hope that the Council already ensures that our recycling waste is never sent to countries where it may not be handled properly and vulnerable communities in poorer countries suffer the consequences. The carbon emissions from transportation of waste for recycling also needs to be part of the assessment, so better provision for undertaking this activity closer to where the waste is collected should be supported by the Council.

Regarding the waste that fits in the last stage of the hierarchy, that is Dispose, we understand that the Council currently sends this waste to incineration rather than landfill, but whether or not this is the better option needs to be looked at very carefully⁶⁸. It is important to remember that incineration is far from a carbon neutral solution, even if it generates electricity. Incinerators emit more CO₂ per megawatt-hour than gas-fired power plants.

The Government data that FoE has used in the information it has published that we referred to earlier shows that Hillingdon currently reuses, recycles or composts 37% of its household waste⁶⁹. The best figure for similar local authorities is 53% so this should be a target that Hillingdon needs to aim for in the near future. **The actions under this Theme therefore need to be elaborated with more detail and challenging interim targets as well as a final target of zero waste to incineration or landfill.** We look forward to seeing these developments in the promised Waste Management Strategy Plan.

Comments on specific actions under Theme C5

- a) *C5.1 Lead by example with a clear waste collection and sorting strategy for the Council’s own operations with year on year targets for improvements*

Leading by example is extremely important so addressing the Council’s own waste, which is what we assume this Action is directed at, is crucial if this is going to be

⁶⁸ See for example footnote 65

⁶⁹ See footnote 3

successful. **The Council can model best practice in its own operations and by doing this encourage all businesses in the Borough to minimise waste.** At the moment Action C5.1 does, though, lack detail so it is not clear what the Council is going to do and improve. We therefore look forward to the details of how Action C5.1 is going to be taken forward, which will presumably be in the proposed Waste Management Strategy Plan. Year on year targets will be important so that action happens, but it would also be helpful to have a final target, which should, of course, ideally be zero waste sent to landfill or incineration.

The **Council can also set an example relevant to waste in its decisions on procurement and in this respect it could, for example, champion the circular economy by demanding recycled materials from its suppliers.** We have already suggested this approach in our comments on Action C2.6, so that and Action C5.1 need to be joined up. Regarding waste, a very early commitment the Council could take would be to phase out and then ban the use of single-use plastic in its offices and premises. This could, then, underpin rolling out the policy more generally as is being promoted in some other local authority areas⁷⁰.

b) C5.2 Support the West London Waste Authority on waste reduction campaigns

Given that the West London Waste Authority (WLWA)⁷¹ is the statutory authority responsible for the disposal of waste collected in Hillingdon and five other west London Boroughs, it is assumed that the Council is already supportive of efforts the Authority makes to reduce waste. However the aim - and it is again assumed that this is also WLWA's aim - should be **to send zero waste to landfill or incineration, moving towards a circular economy where no resources are wasted.** The Council, working with WLWA, should ensure that these ambitions are promoted clearly throughout the Borough.

The discussion below the actions for Theme C5 does, of course, include information about the important waste hierarchy of Avoid, Reduce, Reuse, Recycle, Dispose. The comment that “*We must first encourage the avoidance of waste wherever possible*” is absolutely right. One particular activity where the Council could act to help deliver this concerns work to re-build or extend a house or other building. Waste would be reduced by having a strict restriction on how often an existing building (privately and Council owned, residential and non-residential) can get permission to extend or rebuild.

c) C5.3 Provide an online resource for educational facilities to develop and implement waste reduction strategies. Monitor, record, and report on progress

Online resources can be useful for anyone about any issues that would help them reduce their carbon footprints, but the comments we have made regarding the dedicated online learning resource described in Action C1.2 are relevant.

⁷⁰ For example, see the news item “[Ditching single-use plastic](#)” published by Supply to Surrey, a partnership of councils in Surrey, Surrey Police and the University of Surrey

⁷¹ [West London Waste Authority](#)

Educational facilities may welcome such material that is specifically directed at how they might develop and implement waste reduction strategies, but what they then do should be part of the climate action plans that are indicated in Actions C1.7 and C1.8. For the educational facilities the Council manages, it does, then, of course, have a role to ensure that action on waste reduction is actually delivered.

Monitoring, recording and reporting on progress as indicated in Action C5.3 is helpful, but delivery must also be achieved. Moreover, educational facilities may welcome an online resource that covers other issues that should be part of the climate action plans they will be required or encouraged to produce. It may be that Action C5.3 needs to be joined up with Actions C1.7 and C1.8 that relate to educational facilities, and that those facilities are involved in developing the details of actions on waste reduction as well as other things.

d) C5.4 Work with businesses to reduce waste productivity

We are pleased to see that the Council has recognised its leadership role to work with business on waste reduction. As Action C5.4 is further developed it will, though, be important for there to be more detail about how this will work, and measurable targets and dates for results to be delivered. As for other actions, it will also be important for the Council to set an example for its own operations, as well as use procurement decisions to champion the circular economy. How Action C5.1 is developed is therefore important if Action C5.4 is likely to be really successful.

e) C5.5 Encourage and support residents and communities to reduce, reuse and recycle waste

Action as in C5.5 is really important. **Helping to reduce waste in the first place is obviously essential.** Hillingdon Friends of the Earth are already active in this respect under the Restart Project⁷² where help is provided to repair broken items, particularly electronic devices. The Council could support and promote activities like this. Supporting and promoting the reduction of waste in other ways, such as by cutting out the use of single-use plastic as we have already mentioned in our comments on Action C5.1, would also be very helpful.

Reuse could be encouraged by the Council promoting schemes such as Freecycle⁷³ or Gumtree⁷⁴ where people can give away or sell to others goods they no longer need. Supporting community electrical goods and furniture recycling schemes, including with financial support, that enable low income households to acquire goods they might otherwise not be able to afford, would also be good. On recycling, the Council should, of course, work with the West London Waste Authority as we have indicated in our comments on Action C5.2.

f) C5.6 Develop a community campaign to manage waste more sustainably

Action C5.6 obviously needs to work with Action C5.5. **A community campaign to promote the hierarchy of Avoid, Reduce, Reuse, Recycle, Dispose could be**

⁷² See [Restarters West London](#)

⁷³ Hillingdon Friends of the Earth has published [information about Freecycle](#) and similar initiatives, Freegle, Trash Nothing and Nextdoor

⁷⁴ [Gumtree](#) can be used to sell or swap items and place posts for items wanted

really helpful. But details about what this will try to achieve and by when do need to be developed to ensure that this Action does delivers tangible results.

g) C5.7 Promote the importance and value of growing food, either individually or through community groups

Promoting the growing of food is clearly helpful, but not everyone can benefit from this. It will not be possible for everyone to engage in such activities for various reasons. For example, those living in properties without gardens are unable to grow their own food even if they want to, unless there is really good access to allotments for them.

More generally, the issue of food waste needs to be addressed in the proposed Waste Reduction Strategy Plan. We understand that food waste in Hillingdon will soon be sent for anaerobic digestion and so produce methane that will be added to gas supplies. This would, of course, be a more renewable source of gas, but when used in boilers it will still release carbon dioxide so it is not zero carbon. Home composting of peelings from fruit and vegetables may be a better alternative where this is possible as that does lead to some sequestration of carbon as well as more nutrients in the soil when it is used round the garden. Guidance from and action by the Council is therefore important to ensure food waste is dealt with in the most climate friendly way.

Less food waste would, of course, be the best option. **Action is needed to minimise food waste in the first place.** In this respect, apps⁷⁵ that enable people to share food that they do not need (and this could include surplus food they have grown) could be promoted by the Council.

Food retailers, the hospitality sector and so on need to be encouraged to, and supported in, sharing unwanted food with charities or community groups for use by those who are financially struggling.

As well as promoting the growing of food and a reduction of food waste, **the Council should also promote sourcing food more sustainably**, including by setting an example for its own operations. The issue of food, including food waste and sourcing of food, therefore needs to be covered in a much wider way than would come under this Action. This is likely to be an area where a big effort is needed to promote behaviour change in the public.

A large part of what is needed in a move to more sustainable sources of food is the need for a substantial move from meat-, dairy- and fish-based diets to mainly plant-based diets. The methane released into the atmosphere from beef and dairy cattle farming in particular is a significant constituent of greenhouse gases, but the impact of food sourced from other meat and fish is also more damaging than food sourced from plants. The Council will need to play its part in promoting and supporting this transfer in a sympathetic way, bearing in mind also that disadvantaged households tend to buy cheaper food, which is generally associated with more greenhouse gas emissions.

⁷⁵ See for example [Olio](#)

Theme C6: Climate Change Adaptation and Mitigation

Overview

We understand and agree with the definition of “Adaptation” in this Theme, in that much of the damage of the climate crisis has already been done, or is inevitable, and we have to find ways of dealing with what we can’t prevent.

Our understanding of “Mitigation”, however, is that it covers **all** measures to reduce greenhouse gas emissions, as well as **all** measures to absorb those emissions, i.e. it covers all action that can be taken to prevent damage that is not yet inevitable. **On that definition, almost everything envisaged by the Strategic Plan is climate change mitigation.**

We note the statement that *“In the context of this objective, mitigation means the enhancement of “sinks” that store and process harmful carbon emissions”*, which we understand to be a very limited definition of mitigation, but which nevertheless has real value. We have commented on mitigation as explored under this Theme, but these are not, of course, our only views on mitigation.

We are a little confused by the next paragraph, which states that *“climate change problems are exacerbated by... the natural storage of (greenhouse gases)”*. Surely the opposite is the case, and we wonder whether this should read **“the removal or destruction of the natural storage”**

The commitments that have been made in the actions indicated under Theme C6 seem to concentrate on water and flooding, but what might be done has relevance to green spaces, including tree cover. Indeed, green space management and the interaction with flooding is recognised, which is important. The loss of natural green space and tree canopies, grassed areas concreted over and the loss of garden space, all of which would have continued to act as carbon sinks, is noted in the discussion below the actions under Theme C6, but no specific actions that might stop these is provided. We agree that all of these need to be stopped and reversed.

However, it is also important that green spaces, both existing and new ones, are seen as important in their own right. They are important to how the nature emergency is addressed, including the continuing loss of biodiversity. **The nature and climate emergencies are, of course, linked, but it is still important in our view to identify specific actions that deliver solutions to the nature emergency and particularly to the loss of biodiversity.**

Some of the actions that should, therefore, be developed more, such as preventing the loss of green space in gardens, could be controversial. On that issue, it would, for example, be necessary to persuade or deter people from making more space to park cars or putting down artificial grass to replace a growing lawn. Indeed the increasing need to charge electric vehicles has the potential to exacerbate this problem.

Regarding artificial grass or turf, the increasing number of companies advertising their services to install this is alarming. Urgent action is needed to deter this activity,

with, of course, help to enable those employed in installing it to change to more eco-friendly activities. We suspect that too few people are aware of the threats to our health and our water supplies from artificial lawns⁷⁶ and so it would be important to highlight these, as well as the true carbon footprint of their use and threat to biodiversity⁷⁷.

Given that some necessary actions are, though, as we have said, likely to be controversial, developing them should involve working with people and communities rather than just passing on information. We have already mentioned the importance of this in our comments on Theme C1. So these apply here too. **Additional decision making processes, such as a citizens' assembly, would be helpful for difficult or contentious choices** so that there is ultimately more likely to be acceptance of the changes that are necessary.

We are particularly pleased that the discussion under Actions in Theme C6 indicates that *"We need to identify the most vulnerable and those at risk and ensure we put in place support and resources so that the impacts of climate change are managed appropriately"*. We have already indicated the importance of doing this in our comments on Theme C1 as doing it is relevant to many possible actions.

However, the reference to the impacts of climate change being "managed appropriately" does beg the question about how what is "appropriate" would be decided. **As well as ensuring the most vulnerable are identified, it is important that actions are developed whilst engaging with the most vulnerable and the communities they live in.** Actions that are specifically targeted at the most vulnerable must then be prioritised. There is, of course, already one action, namely Action C1.6, that is specifically targeted at the most vulnerable, but we hope that other actions too are developed and targeted at helping the most vulnerable and at-risk people and communities.

Comments on specific actions under Theme C6

- a) *C6.1 To put in place a water efficiency strategy for all Council operations (i.e. green space management), then monitor, record and report year on year savings*

This Action appears to be limited to a water efficiency strategy only for green spaces, but such a strategy is important for all the Council's operations, including in council buildings and anywhere else. We hope that the reference to "i.e. green space management" was therefore really meant to be "e.g. green space management".

A water efficiency strategy that applies to the Council's management of green spaces is clearly useful. But, as indicated above, green space management needs to look at more than water efficiency as an adaptation measure. Green spaces need to be protected and enhanced so that they better address the nature emergency as well as continuing to store carbon rather than release it. The need to

⁷⁶ See for example "[Why Artificial Grass is Bad for the Earth](#)" published by Sustainable Rossmoor

⁷⁷ These and other issues are explained in "[17 reasons to avoid fake lawns](#)" published by Jack Wallington, Garden Design

ensure good public access is also important of course, especially in parts of the Borough where access to green spaces is not so good at the moment.

b) C6.2 To ensure the Council's flood resilience and management work incorporates a changing climate and that the Council's own land and property decisions consider the need to make space for water

Ensuring that property has flood resilience, taking into account how climate change may affect what is needed, is important. But this Action appears to only be directed at the Council's own property and land. **Private properties should be flood resilient too and should have provision to make space for water.** This should, as we have indicated in our comments about the actions under Theme C3, always be delivered for new developments, large and small. For existing buildings, flood resilience is clearly an issue where support and help is important to those who are most vulnerable, as well as resources where appropriate.

c) C6.3 To run a campaign to raise awareness for the need to be better prepared for a changing climate

As we have indicated above, the people and communities that would be most affected by what might be done under the actions that are developed under this (and other) themes need to be involved in their development. **A campaign to raise awareness as indicated in Action C6.3 could be really helpful to get people more prepared to be involved in the development of actions, but it should not just tell people what the solutions are, but engage with people and communities to develop those solutions.**

Theme C7: Carbon Offsetting

Overview

Carbon offsetting has a long history as a “solution” to difficult problems with greenhouse gas emissions, and generally has a bad reputation. The idea of a company or project continuing to produce emissions, while “compensating” for them by investing in schemes to reduce emissions elsewhere, has been at the root of fossil fuel companies’ “greenwashing” for many years. Now, as most such schemes are understood to be essential anyway, the scope for genuine offsetting is diminishing. Friends of the Earth’s clear and uncompromising view on offsetting⁷⁸ makes it clear it should be a last resort.

So carbon offsetting remains something that needs to be considered for carbon emissions that are really difficult to avoid, but **the priority must always be to reduce emissions rather than ever think that carbon offsetting is an easy answer**. We therefore welcome the statement in the discussion under Theme C7 that “*Offsetting sits alongside a robust reduction strategy; we will use it as a last resort and only to be relied upon for those emissions that simply cannot be saved.*” However, we are concerned that some actions under other themes in the draft Strategic Plan do not seem to be underpinned by this approach.

Carbon offsetting that relies on being able to buy offsetting in the UK outside of the Borough is likely to be unrealistic as other councils will be wanting to use any opportunities in their own areas for their own purposes. Relying on being able to buy unrealistic amounts of offsetting in other countries is also a problem. It would be really important to ensure that offsetting bought in other countries does not lead to a massive and unfair land grab in the global south that threatens local people’s way of life and access to land to grow food.

As future plans are developed, the scale of offsetting that would be required if this approach is relied on should therefore be measured against what is possible in the Borough without reliance on purchasing offsetting elsewhere. Indeed, one completely unacceptable scenario would see funds being put aside by the Council, or being taken by the Council from others, for carbon offsetting, but then not actually being used to deliver anything on a reasonable timescale, because of the difficulty of meeting the combined demands from this Borough, other parts of the UK, and other countries, to solve their own problems by offsetting.

Plans should not, therefore, rely on it being easy for either the Council for its own operations, or any part of the community, to simply buy offsetting as a way out of the problem where carbon emissions are difficult to reduce.

How carbon offsetting is accounted for also needs to be done very carefully so we welcome the promise “*to ensure transparency in reporting*”. **Total transparency in any reliance on carbon offsetting is paramount so that it is not just unacceptable “greenwashing”**. As well as being clear about what is being delivered, where this is and how much is being delivered, there must be

⁷⁸ See FoE information “[Does carbon offsetting work?](#)” published in February 2020

transparency regarding the timeframe in which it is to be delivered. It must not be possible to claim net zero carbon emissions where offsetting emissions that are happening now is being deferred until some distant point in the future. Finally, **carbon offsetting must always require additional carbon to be captured and stored, with that storage being managed so that it continues to work in the long term.**

We agree that more trees could mean that more carbon is stored. Indeed, a recent report by Natural England confirms that woodlands have high rates of carbon sequestration, although this does depend on the species, age and location⁷⁹. However, as we have indicated in our comments about Theme C6, it is essential that trees are considered as important beyond their role in climate change mitigation or carbon offsetting. **Better managed and more trees are an important part of addressing the nature emergency and restoring biodiversity.**

We therefore welcome the indication in the discussion below this Theme that the Council has “many parks and open spaces that provide the perfect opportunity for increased tree planting and biodiversity improvements”. Planting the right trees in the right places, or rewilding where they are allowed to grow naturally, which can often be a better option, would help to repair the biological carbon cycle by repairing some of what has been lost by the destruction of habitats. **But trees cannot be seen as an easy solution to repair the fossil fuel cycle, rather than solutions that involve working hard to remove reliance on fossil fuels.**

Carbon capture and storage by trees (and other natural habitats such as salt marshes and peatlands) is, of course, very different from carbon capture and storage of emissions of CO₂ from power generation and other industrial processes. It is clearly important to explore and develop possible ways for such carbon capture and storage. But current projects exploring carbon capture and then compression for storage seem to be very energy intensive, requiring extra energy in the first place in order to work. It may be that more successful processes will be developed in the future. But **relying on there being many opportunities for buying carbon offsetting from carbon capture and storage from industrial processes would, we believe, be unrealistic.** These approaches may never be that successful as a way of enabling the Council to purchase effective offsetting. They are, moreover, based on processes that continue to emit the carbon dioxide that is subsequently captured, and so could encourage the continuation of those processes, rather than working towards bringing emissions down as close as possible to zero.

Comments on specific actions under Theme C7

a) C7.1 To develop a Carbon Offsetting strategy for the Council's own operations to manage any residual carbon emissions

As we have indicated in our comments on Theme C2, **the priority must be for the Council to aim for zero emissions rather than just net zero where offsetting is seen as a realistic approach.** As we have explained above, depending on significant carbon offsetting is an approach which is unlikely to work. The carbon

⁷⁹ See [Natural England's study](#) reviewing carbon storage impact from England's habitats, including native woodlands, saltmarshes, grasslands, heathlands and peatlands, published on 20 April 2021.

offsetting strategy that would be developed under Action C7.1 therefore needs to take all relevant issues into account, and in particular not lead to money being put aside for offsetting when there is no realistic chance of offsetting ever happening. However, **a tree strategy that could deliver some carbon offsetting in the Borough, but which would be much more important to deal with the nature emergency and loss of biodiversity, certainly should be developed by the Council.**

Moreover, how the Council develops the issue of carbon offsetting for its own operations needs to take into account the leadership role it has, so that offsetting is not seen as an easy answer by any parts of the community where it is less easy to reduce emissions.

b) C7.2 To promote carbon offsetting opportunities for businesses and communities as part of a complete package of measures to tackle climate change and not as a sole solution

The difficulties we have identified above with too much reliance on offsetting would, of course, apply to businesses and communities as well as the Council's own operations. **Any promotion of offsetting must therefore be part of a package which first and foremost promotes a reduction in emissions to as near zero as possible.** Then any offsetting must be done in ways that are transparent, clearly effective, can be independently verified, and which do not lead to unfair offloading of problems with the UK's carbon emissions to other countries, particularly those in the global south. Action C7.2 therefore very much needs to be linked to actions under the other themes, such as actions under Themes C1, C3 and C6 that could lead to significant reductions in carbon emissions by businesses and communities.

Tree planting could be part of opportunities for businesses and communities to help with carbon offsetting and it is good that this is recognised, but the scale of planting that would be needed for it to deliver offsetting needs to be very carefully assessed as there may be very unrealistic expectations about how this can work.

We are concerned that the commitment in the discussion below this Theme that *“developers who cannot achieve zero carbon in a new development will offset the ‘shortfall’ through contributions to the Council who will find savings on their behalf”* could lead to the Council sitting on funds that cannot actually on any reasonable timescale lead to any offsetting being delivered. Our concern about this is that it could mean developers are less likely to try to achieve zero carbon in new developments, avoid cutting down trees and so on as it might be easier to just make payments to the Council.

As we have indicated in our comments on Action C3.1, the aim should be that buildings in new developments meet Passivhaus standards, or level 5 or 6 of the Code for Sustainable Homes. Developments should also be required to deliver biodiversity net gain. **We are not against the Council using any funds it can obtain from developers to fund climate actions and nature restoration projects where this can be done sensibly and responsibly. But this must not provide**

an easy way out for developers who might prefer to build homes that are not better than zero carbon.

There is, of course, a particular problem when one of the businesses in the Borough is Heathrow Ltd. It seems extremely unlikely that offsetting (including carbon capture) will ever be sufficient for them, especially if it is assessed properly and not offloaded unfairly to other countries. There must, of course, never be a 3rd runway and we are sure that the Council will continue to oppose that. But the Council will also need to engage with Heathrow Ltd to ensure that they play their part by taking action to reduce carbon emissions to as near zero as possible.

c) C7.3 Increase carbon sequestration through increased planting and changes to green space management. In particular to plant more street trees in urban areas to improve air quality, tackle flood risk and improve the quality of life

We welcome Action C7.3. It will, though, be very important to ensure that **any assessments for the purpose of carbon offsetting require additional sequestration of carbon in trees and green spaces in the Borough and not include carbon already stored**. As the Action indicates, there must be increased planting and changes to green space management and, in order to know whether there is any increase, knowing exactly what the starting position is will be important. Any loss of existing or new trees and green spaces at any point would then have to be deducted from any assessment of carbon sequestration.

Planting and changes to green space management are, as we have indicated, important for reasons beyond carbon offsetting. The commitments on page 11 of the Strategic Plan that “*we are seeking to protect our own trees where we can*” and that “*we also have large scale tree planting ambitions to increase the tree canopy coverage across the borough*” are, of course, relevant to this Action. A recent report by the Woodland Trust has found that only 7% of native woodlands are currently in a good ecological condition⁸⁰, so it will be important to also ensure that protection for existing trees ensures improvements in this respect where necessary. **But trees need to be considered as part of a wider green spaces policy and there should be specific targets, for example, about how much green space is to be improved, or how much extra tree cover is to be achieved**. Moreover, Action C7.3 and some actions under Themes C3 and C6 relevant to green spaces need to be joined up.

This Action does also helpfully recognise improvements to air quality, mitigation of flood risks and improvements to quality of life that can be delivered by more street trees. All of these are really important. More street trees can certainly help capture some emissions from vehicles. However, better air quality and mitigation of flood risks can often be delivered by green spaces more generally, not just street trees. In this respect, the Eastcote Rain Gardens⁸¹ are a good example of this in Hillingdon. Moreover, green space management and new green spaces are, of course, very

⁸⁰ See [State of the UK's Woods and Trees 2021](#)

⁸¹ See the Council's news of the national award [for Eastcote Rain Gardens](#)

important for addressing the nature emergency and loss of biodiversity, as well as providing some role in carbon offsetting, so this needs to be recognised too.

Improving air quality is, of course, an issue that needs to be addressed by approaches other than street trees and changes to green spaces. The draft Strategic Plan does mention action that has already been taken about cars that are idling, but further action on idling combined with providing more street trees is far from a sufficient solution. For example, there is nothing specifically about clean air zones, either current or new/improved in the draft Strategic Plan. An Air Quality Action Plan is, though, promised in due course so we very much hope that will develop a comprehensive approach and solutions to improve air quality. In this respect, it is often the case that some of the most vulnerable people are most affected by poor air quality. As we have indicated in our comments about Theme C6 and elsewhere, ensuring those people are identified and action is specifically targeted at those people and the areas they live in will be important. As we have also said elsewhere, ensuring those people and communities are involved in working out what actions should be pursued is also essential.

If the Council wants Hillingdon to rely on being one of the greenest boroughs, there must be clarity regarding how this is to be measured. **The number of trees will clearly not be the only relevant factor, but really good targets for increasing tree cover are important.** Bearing in mind that the Forestry Commission and others recommend a minimum of 20% tree cover even for densely populated urban areas, the ambition in Hillingdon needs to be very much more than this. If, say, existing tree cover in Hillingdon is already about 20%, doubling that figure so that the target is 40% tree cover would seem to be quite reasonable.

Any targets must, though, discount the destruction of trees by HS2. We know that the Council is as concerned as we are about such destructions, and it will be vital for the Council to ensure that compensation by HS2 for these losses is effective. But that compensation should clearly not permit the Council to claim success from increased tree cover where that increase is merely replacing those losses from HS2.

As the Council is quite rightly proud of Hillingdon being green, aiming for significantly more tree cover should still be a priority, even if data on tree cover were to show that Hillingdon is already doing better than the average for similar areas.

Tree coverage can be increased by planting, but that must be done very carefully with the right tree planted in the right place. The source of trees that are planted should also be considered very carefully given the diseases that have been introduced to the country from imported plants, such as ash dieback which was at least in part introduced into the country on ash saplings⁸². Planted trees also need to be cared for very carefully, so how that is to be done needs to be part of how actions are developed. For example, there are too many street trees that die due to lack of water or strimming grass too close to their trunks. **Increasing tree coverage by allowing rewilding may therefore be a better option in many places.** We are pleased that this option seems at least to be recognised where the discussion below

⁸² As explained in the Woodland Trust [information about ash dieback](#)

this Theme indicates that the Council wants to “*allow more naturalisation of green spaces*”. How tree coverage is increased should be part of a wider plan about green spaces that protects and improves existing spaces and creates new ones. **Ideally there should be a nature and ecosystem restoration plan for Hillingdon.**

The Heritage Lottery Fund has reported that Britain’s parks are expected to fall back into a state of neglect after years of continued improvement. This isn’t surprising given the scale of budget cuts to councils. To add to this, the 2019 State of Nature Report by RSPB and others⁸³ highlights a shocking decline in nature in the UK. It is essential that all existing green spaces are appropriately protected and managed to reverse the current loss of, and damage to, local wildlife sites.

Public access to green spaces is also essential, not least because of the health benefits that this can bring. In this respect, ensuring that there are some tranquil areas away from areas of high footfall for those who need rest and relaxation away from noise would be particularly important in areas where people do not have private gardens. Access to green spaces must also to be designed so that the needs of disabled people are catered for wherever possible.

Regarding new green spaces, we note that there are parts of the borough, mainly in the south and east, where residents are deprived of public green spaces⁸⁴. This should be rectified. Play streets⁸⁵ could be encouraged in Hillingdon and then accompanied by an initiative to green the street with trees and planters, and some of the closures could even be made permanent.

It will be necessary to include specific details about many other things in a plan for green spaces, both existing and new ones, in the Borough. For example, the planting of native wildflowers and the elimination of the use of pesticides⁸⁶ are important. We know that some of the relevant issues are already at least partly adopted by the Council, not least because we understand that the Green Flag awards that the Council has do, amongst other things, require policies that seek to eliminate the use of pesticides. The Council has, moreover, planted wildflowers in certain places, although these tend to not be limited to wildflowers native to the UK.

A nature and ecosystem restoration plan for Hillingdon would also need to be joined up with actions under at least some of the other themes. It will be particularly important that, as we have indicated, actions under Theme C3 ensure no more destruction and future enhancement of green spaces, including the importance of ensuring that wildlife corridors are maintained and new ones created. The policy framework to promote the design and delivery of ‘green infrastructure’ across London for the benefit of people and wildlife in the All London Green Grid⁸⁷ could be a helpful guide on many of the relevant issues.

⁸³ See [State of Nature Report 2019](#)

⁸⁴ See the Friends of the Earth survey [Access to Green Space in England](#)

⁸⁵ According to [LondonPlay](#), Hillingdon is one of the few London boroughs that does not have any play streets yet so this idea should be promoted and supported by the Council in the first place.

⁸⁶ The Pesticide Action Network UK has published “[Going Pesticide Free: A guide for local authorities](#)”

⁸⁷ See [The All London Green Grid](#)

Assessing changes in biodiversity is likely to be an important part of measuring how effective actions are. There cannot, though, be any meaningful assessment of whether the loss of biodiversity has been halted and biodiversity gains have been delivered if there is no good assessment of the current state of biodiversity where action is being taken, or more generally in Hillingdon. In our comments on Action C3.4, we have said that developers should be required to provide compensation for any loss of biodiversity plus a net gain. **Assessing compensation for loss of biodiversity as a result of developments, as well as commitments for biodiversity net gain, must be accurate and transparent.** Action then taken must be permanent rather than an action that too easily reverses in a few years.

We have also indicated in our comments on Action C3.4 that the Council could consider working with others, such as the Wildlife Trusts and Brunel University London, in order to adopt the best decisions relevant to green spaces in planning decisions. This could also be a good for a more general approach in a nature and ecosystem restoration plan for Hillingdon.

Links between Government and Council Responsibilities

Hillingdon Council, like any local authority, needs support from the UK Government to enable it to make the changes necessary to combat the climate crisis.

As we have indicated in our general comments, a recently published Blueprint⁸⁸, developed by Friends of the Earth and a number of other organisations, with support from the Local Government Association and London Councils, identifies how Government needs not only to show national leadership, but also to ensure that councils are empowered enough to tackle the climate emergency. This Blueprint identifies five immediate priorities for how “*the government can accelerate a green recovery from coronavirus whilst helping to set the foundations for longer term solutions to the climate and ecological crises we face*”.

These priorities are:

1. Invest in low-carbon and climate-resilient infrastructure including public transport, renewable energy and electric vehicle charging
2. Support reskilling, retraining and research to accelerate the move to a net zero economy
3. Upgrade our homes to ensure they are fit for the future
4. Make it easy for people to walk, cycle, and work remotely
5. Accelerate tree planting, peatland restoration, green spaces and other green infrastructure

The Blueprint identifies the national changes, as well as the additional powers and resources needed at the local level, in order to address these priorities. All of these issues, apart from peatland restoration, are directly relevant to Hillingdon, so ensuring that they can be successfully pursued is important. We would be very happy to work with the Council in any way that might help secure the necessary action by the Government to deliver on these priorities.

⁸⁸ See footnote 9

Conclusion

We are pleased to have been able to share our insights on actions that Hillingdon Council must or should take to help address the climate and nature emergencies. We have tried to do this in a constructive way, but have of course indicated in a number of places that we believe the draft Strategic Plan lacks some ambition. We hope that these comments are seen as helpful. We also hope very much to be able to continue to engage with the Council to help develop future plans and the implementation of actions.

We have in our comments made a large number of suggestions that go beyond what is currently covered by the draft Strategic Plan. We realise that some of these may already be about issues that the Council would like to develop in the future action plans that have been promised. But it is really important that the Strategic Plan is framed with the right ambition to ensure that it does not unduly constrain what might be possible in those future plans. Otherwise, some of the actions we have proposed may not be possible to develop without a new decision at the strategic level, even if, for example, they have been found to have wide support across the community.

The types of engagement we have indicated with the community, such as a citizens' assembly, might indeed identify important actions that could be pursued that are both outside the scope of the existing themes and any of the additional suggestions we have made. (We would not want to claim that we have all the answers.) That should be welcomed of course, and so the Strategic Plan should be open to the possibility of such developments.

It may be that the easiest solution would be to **add an additional Theme and Action** to the Strategic Plan that would permit **the identification of additional areas for action that are currently outside the scope of the existing themes and actions**. This additional Theme and Action would also need to enable any necessary or desirable joining up with anything developed in any of the future action plans under the existing themes.

At this point in the development of actions in Hillingdon that will help address the climate emergency, it is really important to ensure that there is enough flexibility in what is agreed by the Cabinet at the meeting in July. There must be space for innovative and creative, as well as ambitious, actions to be developed for both the Council's own operations and the whole community in the Borough. There may, of course, be ways other than by an additional theme to make sure the flexibility is there, but the agreement of the Strategic Plan now must not unduly constrain what actions might be possible to develop and how they are developed. Addressing the climate emergency is much too important an issue for lack of foresight now to mean there would have to be delays in action later because a new Strategic Plan is needed.