



Executive
12 April 2010

**Report from the Director of
Environment and Culture**

Wards Affected:
ALL

Brent's response to the Mayor's draft Climate Change Mitigation and Energy Strategy and draft Climate Change Adaptation Strategy

1.0 Summary

- 1.1 The Mayor of London is consulting on two documents. The first concerns London's energy future: "The Mayor's draft Climate Change Mitigation and Energy Strategy" and the Mayor is consulting the London Assembly and functional bodies until 1st April 2010. It is proposed that the Council comments to ensure that the borough is able to take advantage of the opportunities available. The Mayors' Vision by 2025 is that London is one of the world's leading low carbon cities, having minimised CO2 emissions, with a thriving low carbon economy, the world's most energy efficient buildings, a secure and efficient energy supply and low carbon transport. This report sets out for approval a proposed response by the council to the consultation.
- 1.2 The second document is "The draft Climate Change Adaptation Strategy for London Public Consultation Draft". It is proposed that the Council comments to ensure consistency between the council's approach and this London-wide strategy. The Mayor's draft strategy proposes a broad range of measures on how the Mayor believes London can manage the challenges climate change and extreme weather conditions will bring. The actions, to reduce the risks from flooding, drought and heatwaves and looking at the impacts on cross-cutting issues of health, environment, economy and infrastructure, will involve amongst others, the GLA, London boroughs, the NHS, Environment Agency, DEFRA, TfL, London water companies and the London Development Agency who will all need, to begin to adapt in preparation for predicted climate change. A roadmap to resilience is set out in the document.

2.0 Recommendations

2.1 The Executive is asked to approve the attached Appendices 1 and 2 as the Council's responses to the consultation on both documents.

3.0 Detail

3.1 Regional and National context

3.1.1 Both consultation documents have arisen from a number of past reports, draft and consultations and strategies from the Mayor of London and both strategies will be consistent with relevant policies and proposals in these documents. Since taking office the Mayor of London has consulted on a number of relevant key strategies including:

- Consultation draft replacement plan: London Plan - Spatial Development Strategy for Greater London, October 2009
- The London climate change adaptation strategy: Summary draft report, August 2008

3.1.2 The Mayor of London has highlighted the following national policies as providing a context for these London's strategies;

- Climate Change Act, November 2008
- The UK Low Carbon Transition Plan, July 2009
- The Heat and Energy Saving Strategy Consultation, February 2009
- The UK Low Carbon Industrial Strategy, July 2009
- Warmer Homes, Greener homes: A strategy for Energy Management, July 2009

3.2 The Mayor's Proposals

3.2.1 "Delivering London's energy future: The Mayors draft Climate Change Mitigation and Energy Strategy" covers a wide range of energy and carbon mitigation areas. The strategy covers the following mitigation areas;

- Reducing London's CO2 emissions overall
- Making London one of the world's leading Low Carbon Capitals
- Securing a low carbon energy supply for London
- London's homes: driving our energy future – retrofitting homes and tackling fuel poverty
- Cutting costs and carbon in London's workplaces
- Building towards a zero carbon London
- Moving towards zero emission transport in London

The Mayor highlights 16 overall policies to deliver the above mitigation areas. Within these policies are 154 'policies to action' which detail specific actions. The strategy also outlines GLA and LDA funding which organisations,

including the Council, can apply for in order to deliver specific projects and achieve the overall aim.

3.3 The Mayor's draft climate change adaptation strategy for London proposes a broad range of measures on how the Mayor believes London can manage the challenges climate change and extreme weather conditions will bring. The actions, to reduce the risks from flooding, drought and heatwaves and looking at the impacts on cross-cutting issues of health, environment, economy and infrastructure, will involve amongst others, the GLA, London boroughs, the NHS, Environment Agency, DEFRA, TfL, London water companies and the London Development Agency who will all need, to begin to adapt in preparation for predicted climate change. A roadmap to resilience is set out in the document. There are 34 actions listed in the roadmap to resilience section.

3.4 Officers have considered the two draft strategies in detail and are recommending that the Council respond to the two consultations as set out in Appendices 1 and 2.

3.5 **Key points of officers' recommended response**

- Brent welcomes the focus on low carbon energy supply and in particular Decentralised Energy (DE). The 25% target by 2025 is considered useful in focussing efforts in this approach to carbon reduction.
- It is likely that the realistic catalyst for realising DE opportunities will be new development that can provide, to an extent, the infrastructure needed. However, significant additional investment funding will be necessary to realise area-wide DE. The Mayor should agree to act with energy suppliers and the Government principally in order to secure investment funding to bring forward and secure key decentralised networks at an early stage of the development process.
- The GLA/LDA should also consider procuring Energy Supply Companies (ESCOs) at a London-wide level to attract the best investment and de-risk local schemes.
- Brent Council welcomes and supports the principle of Electric Vehicles and the need to expand the supporting infrastructure in anticipation of consumer take-up of these vehicles
- In a period when it is anticipated that public sector funding is going to be reduced post the election, the expectations that councils will be able to match fund the measures outlined in the consultation is going to place a real burden upon the council, and may not be realistic.

3.6 On March 18th 2010 London Councils approved a report at its Transport and Environment Committee which set out its response to the consultation. Overall, London Councils support the general direction, scope and policies contained within the draft – much of which contains the detail of existing programmes, commitments and actions that boroughs are already working

with the Mayor on. The report states that the draft Strategy has very few new issues of concern for boroughs other than the overall challenge itself of meeting large carbon reduction targets. It notes that a significant omission from the draft strategy is a clear indication of the financial implications of the proposals within the strategy. London Councils states that the strategy needs £60 billion for its delivery. Its response asks the Mayor to set out in a coherent way where he expects this funding to come from not least so that this significant market opportunity can be more easily identified and realised. It notes that there is an expectation by the Mayor that London boroughs are critical to the successful implementation of this Strategy and to meeting his proposed CO₂ reduction targets. It goes on to say that the policies themselves appear generally acceptable. A full copy of the London Councils' report is attached as Appendix 3.

3.7 Existing Council Commitments

3.7.1 Brent Council already has a number of policies, strategies and initiatives in place which are in line with the Mayors Draft Climate Change Mitigation and Adaptation strategies. For example the inclusion of National Indicators 185 and 188 in the Council's Local Area Agreement illustrates the Council's commitment to cutting costs and carbon in the borough and adapting to the future impacts of Climate Change.

- In October 2009, the Executive approved the Carbon Management Plan Second review;
- As part of the One Council – Improvement and Efficiency plan, the council; had committed to the Bronze Project – Carbon Management Programme;
- The Executive approved the revisions made to the Corporate Environmental Policy statement;
- December 2009 saw the launch of the borough wide Brent Climate Change Strategy;
- Local Development Framework (LDF) – The Core Strategy is due to be adopted by the end of 2010. The LDF Site Specific and Development Plan Document (DPD) will be consulted and examined in public in 2010.

3.7.2 The LDF's Core Strategy highlights strategic sustainability and climate change mitigation and adaptation measures for major developments. Major proposals are required to submit a Sustainability Statement demonstrating, at design stage and construction, measures that are used to mitigate and adapt to climate change over the lifetime of the development. This includes for domestic buildings a minimum level for the Code for Sustainable Homes and for non domestic a minimum BREEAM rating. Reducing energy demand from current building regulation standards and achieving exemplar low carbon schemes will be a planning requirement. Other Climate Change mitigation actions addressed in the Core Strategy include;

- transport infrastructure by reducing the need to travel and improve transport choices,
- to protect and enhance Brent's open spaces and environment,
- and to treat waste as a resource

- 3.7.3 The council have identified a number of Growth Areas in the borough such as Wembley, Alperton, South Kilburn, Burnt Oak/Colindale and Church End where Decentralised Energy opportunities have been identified. Significant additional investment funding will be necessary to realise area-wide Decentralised Energy.
- 3.7.4 The Housing Strategy sets out the strategic objectives and priorities that the council will work to deliver over the five years from 2009 to 2014. Although its primary focus is on housing, it will operate in the context of the wider strategic priorities agreed by the council and its partners, which in turn aim to contribute to national, regional and sub-regional goals, including energy, fuel poverty, carbon and climate change.
- 3.7.5 Brent Council are currently taking part in the LDA London Heat Mapping project.
- 3.7.6 In Transportation the Council has recently been awarded “Biking Borough” status. Brent is actively involved on the TfL/London Council’s ‘Electric Vehicle Core Delivery Group’, which is assisting in the development/delivery of electric vehicle charging infrastructure across London. The Council also manages the delivery of a package of measures aimed at reducing car dependency.
- 3.7.7 The new Council Civic Centre which will be completed by 2013 aims to achieve BREEAM ‘Outstanding’ and have a 40% CO2 reduction based on the 14 properties to be disposed of.

4.0 Financial Implications

- 4.1 Both strategies do not make explicit financial commitments on the Council but, as pointed out in paragraph 3.5, if matched funding is expected from the Council this will place a heavy burden on budgets, just at a time when the Council is anticipating a significant reduction in available resources.

5.0 Legal Implications

- 5.1 The Council has power under section 2 of the Local Government Act 2000 to do anything which it considers likely to promote the environmental well-being of its area. In exercising this power the council is required to have regard to its Community Strategy (known as the Community Plan).
- 5.2 Furthermore, ODPM Circular 03/2003 on Best Value and Performance Improvement reiterates that sustainable development and equity are fundamental to the Best Value regime. It states that the Government’s definition of Best value is the optimum combination of whole life costs and benefits to meet the customer’s requirements’.
- 5.3 The Council has a legal obligation participate in the Carbon Reduction Commitment and to ensure the transparent display on public buildings of Display Energy Certificates.

- 5.4 Carbon Reduction Commitment (CRC) is a mandatory emissions trading scheme covering non-energy intensive users in both public and private sectors. The Council will be looking to minimise financial penalties under the CRC and this will require the council to undertake some of the actions outlined in the Mayor's Climate Change Mitigation and Energy Strategy.
- 5.5 Under the changes introduced by the Greater London Authority Act 2007, the Mayor now has a statutory duty to consider climate change, and is required to produce a statutory climate change mitigation and energy strategy and a climate change adaptation strategy. The Mayor also has statutory powers to implement the majority of actions in both strategies particularly through the London Plan and the Transport Strategy (revised versions of both are currently being consulted on).

6.0 Diversity Implications

- 6.1 Climate change affects everyone and particularly those who are physically vulnerable – the elderly and the young – as they will be exposed to greater temperature extremes and potentially new or increased threats of disease.
- 6.2 Climate change is predicted to be felt most acutely in areas of the world where communities are less able to adapt. These areas include countries in sub-Saharan Africa, Bangladesh, India, Indonesia, and Australia. A number of residents have strong ties with these nations.
- 6.3 The Council's climate change strategy for the borough places emphasis on mitigating climate change; adapting to changes that are predicted for the future; and responding to severe weather events.

7.0 Environmental Implications

- 7.1 The overall recommendation to reduce the Council's CO₂ emissions will have a positive effect on the environment. Reducing CO₂ emissions (one of the main green house gasses which contribute to global warming) will help mitigate the effect of climate change at both a local and global level. It is expected that the environment will benefit in the long term by the council taking this action.

Adapting to Climate Change will ensure that the council is prepared for the effects of predicted extreme weather events. By making the necessary preparations the council will ensure its key services and the borough's infrastructure are not compromised.

8.0 Staffing/Accommodation Implications (if appropriate)

8.1 There are no specific staff/accommodation implications.

Background Papers

Appendix 1 - Delivering London's energy future: The Mayors draft Climate Change Mitigation and Energy Strategy Consultation – Comments

Appendix 2 - The draft climate change adaptation strategy for London Public Consultation Draft

Appendix 3 - London Councils' Transport and Environment Committee Consultation on the Assembly draft of the Mayor's Climate Change Mitigation and Energy Strategy

Executive Report: Carbon Management Strategy – Second Review, 19 October 2009

Executive Committee Report: Carbon Reduction Commitment Energy Efficiency Scheme, 15 February 2010

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