10 October 2024 ACE Brent response to Brent Council Climate Report

Dear Cllr Rubin and all cabinet members,

We are contacting you as Action for the Climate Emergency, Brent (ACE Brent, a coalition of 13 borough-wide and neighbourhood volunteer environment groups active in Brent), about the Climate and Ecological Emergency Programme 2024-6 report for Cabinet on 14th October. We requested involvement in the development of the new Delivery Plan at our meeting with Cabinet members in April, but have only had the usual public access to the report, from 4th October. This gave us little time to meet and come up with a considered response. The following are therefore some headline reactions.

We are pleased that Brent Council now has you as a new Cabinet member with Climate Action in your brief, and were pleased to meet with you in September and look forward to further discussion. It is also good that there is a new Brent "Climate Champion" (Cllr Mitchell). We are happy to hear you state that the objective for 2024-6 is "to provide even greater focus, pace, impact and visibility, so that we can deliver measurable change on the ground and across our diverse communities". We also of course applaud the work that has already been delivered.

AND we all know that this is an emergency. Brent's need to step up is evidenced starkly by the "Territorial emission reduction trajectory" at the end of the Dashboard, and the fact that its emissions here are higher than other West London Boroughs. We understand the financial constraints and complexity required to meet Net Zero by 2030, but still do not see in the 2024-6 Plan the energetic, ambitious and strategic council-wide approach that we

believe is needed to take on this challenge (see some examples from our experience below).

Specifically :

1. Because of the urgency of this work, and the large number of stakeholders, we have been requesting stronger and more regular monitoring of the programme by members through a new Climate and Ecological Scrutiny Committee. Annual monitoring through another very busy Scrutiny committee, as at present, is inadequate.

2. The 2024-6 borough-wide Delivery plan only has 9 actions which are described as new out of a total of 47. Some of the ongoing actions also seem very late in the day eg. developing and implementing energy efficiency standards in all new council homes and developing "a route map for the council to achieve net zero carbon emissions from the council's own estate and operations by 2030". This is in the context of "leading by example" being one of the ongoing priorities.

3. Despite repeated requests for this there still is no evident prioritisation of actions (based on impact on emissions reductions, and other priorities like impact on cost of living). Given the financial constraints and an overall progress rate in 2022-4 of 55% this seems even more essential.

4. We are concerned that the energy put into the Greener Neighbourhoods, which is of course good, has delayed a more strategic approach. The initiatives and community engagement in these is not new by comparison with work being more comprehensively carried out by other boroughs. As one of our members has stated "2030 targets won't be reached by spending 5 years on one "exemplar" scheme. We are way past proof of concept, now. We know what needs to be done (carrots and sticks) and we know how to do it. We must do it. Now and everywhere". It would still be good to

learn from the pilots and an interim assessment of successes and areas for improvement in the current Greener Neighbourhood projects is needed - this can feed into the newer development pilots. It would also help community groups in other parts of Brent to put forward bids for Neighbourhood CIL.

5. We welcome the benchmarking and target setting that has been made possible by the Climate Data Dashboard. BUT it is very difficult to follow the dashboard due to the headings not being applied to each page. There is also a lack of clarity about what the previous reporting cycle is (this varies and if it is the last Data Dashboard it needs to say this). Importantly, a lot of the target setting is unambitious or absent e.g. target for annual waste per head in 2030 seems to be higher rather than lower. There are no targets for Low Traffic Neighbourhoods and for school streets to only increase to 50% from 33%, no targets for renewable energy in new developments or for trees or canopy cover. There is also variation e.g. more ambitious targets for air quality (when it is not clear how these will be reached). We think it would be good to separate the actions to better monitor those that the council has direct control of.

6. There has been no community stakeholder engagement in the formulation of the 2024-6 Delivery Plan; contrary to the implications in 7.1 and 7.4. There is currently no way for a concerned individual or organisation to be engaged (rather than informed about) climate strategy in the borough, except through the Greener neighbourhoods. The delivery plan proposes no specific plans for improved engagement. This is despite a new focus on "Building community capacity and assets for community-led climate action". This is addressed in para's 6.20-6.22, which refer to principles of "community decision-making" and "collaboration". Para 6.22 seems to

have no real meaning.

7. Further discussion is needed about the easy to make suggestion that "community-led" action is the answer. Our environment and neighbourhood groups, and their members may want to devise and be in charge of particular projects but they also want to engage in and help to develop the strategy that these are part of. They cannot do this without the input of expert council staff. Our coalition includes organisations whose members have significant expertise in Cycling and Active Travel, Parks, Trees and Green space, Food, Planning, Renewable energy and Divestment. We strongly suggest that there are themed engagement and planning climate forums which enable this expertise to be harnessed (as in the past with the Active Travel Forum), as well as a strategic forum through which members of the public can engage in climate action strategy. This will improve collaboration with and help to reduce the frustration of our members, as well as enable the many individual members of our communities who are interested and knowledgeable to contribute.

Examples of lack of planning/ambition on topics we have raised :

1. The 2019 Strategy quoted in the report proposes that "By 2030, **petrol and diesel road journeys will have at least halved in the borough, being driven as close as possible to zero**, with an accompanying increase in journeys made by residents through cycling, walking or public transport." But the delivery plan suggests very little action to progress this at borough level, in particular there are no motor traffic reduction measures despite vehicle ownership and car journeys being static. There is no significant plan for more Low Traffic Neighbourhoods. There is not even a plan to meet the overdemand for bike hangars (which will clearly be holding back active travel). At the same time Brent has put in a

comparatively high number of EV charging stations.

2. Given the **environmental impact of cement, and the amount of new construction** in the borough it is disappointing that there is no mention of the impact of construction, or of the enforcement of Whole Life Carbon Assessments. We suggest that WLCA's are given due prominence and reported as climate action. According to https://www.bbc.co.uk/news/articles/cxee01m5yero, cement is " *major driver of climate change. If cement was a country, it would be the third biggest source of emissions after China and the US, responsible for 7.5% of human-made CO2". We suggest the* Council takes note of the London Assembly report 'Retrofit vs rebuild?' https://www.london.gov.uk/who-we-are/what-london-assembly-does/london-assembly-work/london-assembly-publications/retrofit-vs-rebuild-report . Brent is in a position to be a leading Borough in encouraging retrofit, and carbon-free construction methods where it can, to contribute by example and to apply pressure for needed legislative change. It makes sense for a default position to be adopted that refurbishment is always assessed as an alternative to demolition and rebuild, as a carbon reduction measure.

1. **Encouragement of increased plant-based eating** gets no mention, despite lengthy discussions with the council by members of the Brent Friends of the Earth Food Group on this topic over the last year. We see no council commitment to increased plant-based food at its own events or to the promotion of plant-based food in schools catering.Detailed analysis finds that plant diets lead to 75% less climate-heating emissions, water pollution and land use that meat rich ones. We welcome the Food Strategy aim to "ensure that every person in Brent has access to healthy, tasty, affordable and culturally appropriate food that is good for the environment and our local economy". However, what "good for the environment" means here, apart from tackling food waste more effectively, is not spelled out.

2. The council's aim is "to be **one of the greenest, most biodiverse and climate resilient boroughs in London by 2030**", and improving our ecological environment is an area where borough-wide community engagement could have swift positive results. But there is no sense of ambition or potential; perhaps exemplified by an action only of "*establishing the necessary processes and partnerships to secure Biodiversity Net Gain investment* ".There is no positive action to increase canopy cover despite this being recognised as low (14% vs London-wide cover of 21%). At the same time, developments across the Borough and subsidence claims take out veteran trees providing the best canopy cover. Annual tree planting figures have dropped from 800 in 2019, through 616 last reporting cycle, to 367 now. There is no specific annual target for planting, and any tree planting is expressed to be dependent on funding, without there being any apparent plan to get that funding. We do not need to remind you of the huge positive contribution of trees to a great environment: cooling, well-being, urban greening, carbon capture and anti-pollution. Relevant community groups have not been asked to contribute to the reworking of the already excellent 2017 Tree Strategy, and continue to be willing to be involved. In terms of green space, we are discouraged that the new grounds maintenance contract only includes a commitment to apply for one Green Flag p.a, and a total of 4 by 2030.

With best wishes,

Elaine Sheppard (on behalf of ACE Brent)

Dear Elaine,

Thank you for your detailed comments._I do genuinely appreciate the time taken to scrutinise the work of the council on this hugely important topic, as well as welcoming the opportunity to work with

ACE and other key stakeholders on making the councils commitments to tackling the climate emergency as ambitious as possible, within the obvious financial constraints and competing priorities across the organisation.

I met with ACE prior to the paper going to cabinet, along with Oliver Myers, head of Climate Emergency Strategy, Waste and Climate Action at Brent Council. We discussed the high-level principles of the Climate and Ecological Emergency Programme for 2024-26 and considered your comments at the time in drafting the strategy. The programme was further considered by the entire Corporate Management Team at Brent's and the Cabinet, where feedback and amendments were taken. In addition to this, as you state, the paper was circulated with you once it was in the public domain.

At the joint meeting with ACE, myself and Oliver, I welcomed the opportunity to arrange further meetings on the Climate Emergency strategy of the council with ACE and other stakeholders, and to invite other interested parties in Brent who couldn't attend this first meeting. I believe we agreed some time in December, however I'm more than happy to meet in the next few weeks to have a wide-ranging discussion on the issues you raise. I've copied in Rob Reynolds who will be in touch to arrange this meeting as soon as is practicable.

I've responded below to some of the key points you raise, which I hope will help clarify some of the thinking behind the strategy. Whilst the strategy gives the council a clear direction of travel for the next two years of work, all of us at the council regard the strategy as a 'live' document and if there are areas where we believe need refining, re-defining or re-prioritising we are more than happy to do so.

Separate Scrutiny Committee

I'm afraid there aren't any plans to change the constitutional structures of scrutiny at the council at present.

If we were to re-open discussions around formal scrutiny committees there would be a number of policy areas which would also have legitimate claims to a separate committee (for example: poverty alleviation and helping residents with the cost of living, the housing emergency, Brent's schools, Adult Social Care).

With the resources the council has at hand and a belief amongst members that the current scrutiny committee structures are fit for purpose, I think it is best that we try to focus on ensuring the best level of scrutiny within the current committee. I have requested that time is made to consider the Climate and Ecological Emergency Programme for 2024-26 and will follow this up.

Energy Efficiency

On energy efficiency, 59% of council owned domestic homes are at energy efficiency rating C or higher, compared to 35% in 2019. Of the councils own corporate estate and operations, there has been a 71.6% reduction in emissions since 2010-11. (Source: Climate Action Data Dashboard)

Additionally, you'll see that one of the cabinet paper recommendations includes a change to the percentages we allocate for Brents Carbon Offset Fund. By doing this we are going to be able to make a bid to further improve the efficiency of council homes, thereby saving residents money by reducing bills, and ensuring less carbon emissions. We are also using the fund to make a bid to decarbonise the council's corporate estate. Please be assured that both the ambition and the monitoring of this important task is there, and I will be working to drive this forward over the next period.

Prioritisation of Actions

Thank you for this - we can look at how the actions are prioritised specifically, however the broad principles adhere to the priorities outlined in the cabinet report:

Continuation of priorities from the 2022-2024 Climate Programme:

i) Climate action that supports households with the cost of living.
ii) Climate action that boosts the local green economy and helps local businesses
with the cost of doing business.
iii) Continuation of the two community-led Green Neighbourhood Pilots in
Kingsbury and Church End/Roundwood, and the initiation of the agreed
development-led pilots at St Raphael's Estate and South Kilburn.
iv) Leading by example in the council's own corporate estate and operations.
v) An intelligence-led approach to boroughwide action where it is needed most.

Increased focus within the new Climate Programme:

vi) Improving Brent's resilience to the adverse impacts of climate change.
vii) Connecting people with nature.
viii) Building community capacity and assets for community-led climate action

This is what I will expect council officers to base their priorities on, and I will continue to have regular meetings with them to be updated on progress.

Green Neighbourhoods

On balance I'm confident that the decision to retain the Green Neighbourhood programme is the correct one. I think that the principle of maximum amount of work in a number of areas rather than a smaller amount of work stretched across the borough will allow for a greater impact for residents. It also allows us to focus our work on areas of the borough that are in the most need, such as those with bad air-quality, under-served by active travel measures, residents facing significant impact from rising temperatures, as well as areas with residents effected by poverty and cost of living pressures.

Furthermore, the focus on the Green Neighbourhoods and their links to 'growth areas' in the council, have allowed us to bid for Strategic Community Infrastructure Levy (SCIL) funds, which have allowed for really ambitious climate action-oriented infrastructure being built in the borough. The chief example of this is the £3 million SCIL funding I have secured for the Church End and Roundwood Green Neighbourhood scheme. As you can see from the cabinet report, there are some hugely ambitious proposals in there to green this area of the borough, and to promote active travel and cycling. I will continue to be pressing officers to work out ways in which SCIL money can be applied for to be used in the rest of our Green Neighbourhood schemes.

Finally, the Green Neighbourhood model allows us to use our leverage as an anchor institution in the borough to draw in investment from other partners, hence our two 'development' linked schemes in St Raph's and South Kilburn. I have asked officers to ensure that discussions with developers are as robust as possible and the best deal for Brent residents is achieved to ensure that developers contribute to greening, promoting active travel and tackling air-quality in their developments in these areas.

Benchmarking and Targeting

Thank you for your comments on the Climate Dashboard. I think it will continue to serve as a really useful way for myself, officers and stakeholders to hold the council accountable. I will ask that the format is looked at so relevant headings are on each page. I suggest we pick up the topic of specific targets for particular areas. Where this is practicable, I'm happy to look at setting these.

Community and Stakeholder Engagement

Thank you for the suggestions here regarding themed based engagement, I will consider this with officers and get back to you.

Cement and Construction

Thank you for raising this - I will ask officers to consider the ways in which our planning policies impact carbon emissions. Let's have a discussion on this topic at our next meeting.

Plant-Based Eating

There is not a consensus at the council that only serving plant-based meals at council events, especially celebratory events that are culturally important to different communities in Brent, would be the right approach or priority for the council at this stage. Regarding schools, I think this is something that schools themselves would have to agree to - I would encourage you to get in touch with the Chairs of governors of schools to look at ways plant-based meals might be included as part of the school offer.

I did, however, want this topic to be considered as part of the council's food strategy, so have asked that the Food Strategy committee consider ways in which plant-based eating will be a part of that strategy. That is what 'good for the environment' was intended to mean, sorry if that was unclear!

Trees and Canopy Cover

This is a subject myself and Cllr Mary Mitchell (Climate Action Champion) are especially keen to progress. There are a number of commitments in the 2024-26 programme, and I can assure you that we will be challenging officers to extend canopy cover as much as possible in order to make our residential areas best able to withstand high temperature increases.

I was happy to allow the detail of the commitments on Trees and Canopy cover to be developed in the upcoming Tree Strategy paper that is due to come to cabinet in autumn / winter. Let's have a discussion about this topic at our next meeting.

Finally, I want to re-iterate my thanks for your comments and feedback on the cabinet paper and hope that the above answers your key points. I do hope this email is received in the spirit of collaboration and co-working it has been sent.

With very best wishes,

Cllr Jake Rubin
Labour Party Councillor for Roundwood Ward

Cabinet Member for Employment, Innovation and Climate Action

London Borough of Brent

Brent Council