



Climate Emergency Declaration Research, London

Final Report

October 2021

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EXECUTIVE SUMMARY

This report follows on from an eight month research project which reviewed and analysed public information available in London relating to climate change and, more specifically, climate emergency declarations (CEDs) made by public authorities since 2019. The research formed part of a national project devised and developed by the Environmental Law Foundation (ELF).

The research is premised on an acceptance that global warming and climate change is happening now and that the problems that flow from this such as increased temperatures, sea level rise and more extreme weather patterns are already with us. It is noteworthy that public bodies are taking action to first acknowledge the climate emergency and then thinking about what action to take to do something about it. The research is premised on the basis that tackling the climate emergency will be most effective by a significant and urgent reduction in carbon dioxide emissions and other greenhouse gases.

The research was carried out in two parts: a desktop analysis of online information available relating to climate change action across London followed by some qualitative research progress through environmental information requests of the London boroughs and public bodies. The information requests sought to clarify the work and efforts by public bodies in relation to the climate emergency including the need to rapidly reduce the level of greenhouse gas emissions being produced by society.

Key findings of the research include that high number of London councils have made a climate emergency declaration (all but five boroughs, over 86%) compared to the average of local authorities across the UK of around 75%.

There was a wide divergence with regard to actions taken to tackle the climate emergency. While a few boroughs are yet to make a CED, others are at the drafting stage of a climate action plan following the making of a CED. Some boroughs are already in the process of implementing their adopted action plans. This report highlights some of the key areas of action, including energy and power use, buildings and infrastructure, transport, biodiversity and decision-making systems. Many London boroughs are implementing what may be

regarded as progressive and effective work in securing carbon reduction and minimising greenhouse gas emissions: the critical aim in tackling the climate emergency.

Yet, despite some impressive work by councils, it was not always evident how specific actions would result in the significant emission reductions necessary and many authorities did not appear to have mechanisms in place for monitoring progress or compliance with promises or goals. This applied to actions taken by boroughs who have not yet made a CED and to actions taken by those that have made a CED. Consequently, there is still considerable work to be done in ensuring all public bodies are effectively securing the carbon reduction necessary.

Although many London boroughs are not yet materially implementing their post-CED climate actions, the research has shown that some boroughs were working on climate issues prior to making a CED. Although there was limited available information in terms of the actual implementation and impact of these pre-CED strategies.

In terms of climate change adaptation and resilience strategies; i.e. the work necessary to address the more extreme weather patterns now being experienced across London, the UK and the wider world, the majority of boroughs surveyed did not appear to have publicly available plans, although some did note that they are involved in developing a London-wide strategy to be published by 2023.

Finally, although it is notable that many boroughs have held public consultations on climate change or allowed the public to feed into climate action plans and strategies, the research has found that some boroughs had no provision for community involvement in devising and implementing their climate plans. There were, for instance, some examples where a council stated an ambition to involve the public but without making any concrete commitment to this.

Overall, The next steps from this report will need to be taken quickly, decisively and effectively if the significant carbon reduction necessary is to be secured.

4 October 2021

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1. INTRODUCTION

1. This report is the result of an eight-month research project which reviewed and analysed public information available in London relating to climate change and, more specifically, climate emergency declarations (CEDs) made by public authorities. The research formed part of a national project devised and developed by the Environmental Law Foundation (ELF).
2. The research is premised on an acceptance that global warming and climate change is happening now and that the problems that flow from this such as increased temperatures, sea level rise and more extreme weather patterns are already with us. It is noteworthy that public bodies are taking action to first acknowledge the climate emergency and then thinking about what action to take to do something about it. The research is premised on the basis that tackling the climate emergency will be most effective by a significant and urgent reduction in carbon dioxide emissions and other greenhouse gases.
3. The recent discussion of a 'climate emergency' has been evident from around 2016.¹ However, climate change has been an international concern since at least 1972 and the UN Conference on the Human Environment which referred to evidence of 'major and undesirable disturbances to the ecological balance of the biosphere' and 'that Governments be mindful of activities in which there is an appreciable risk of effects on climate'. Twenty years later the UN Framework on Climate Change 1992 was published at the time of the Rio Earth Summit. Some 23 years later, the Paris Agreement 2015 was drawn together largely to address the lack of action under the UN Framework Convention on Climate Change. If it is going to be possible for the UK as a nation to achieve net zero carbon dioxide (CO₂) emissions by 2050, it is essential that public bodies, including local authorities, take effective action. A good first step is to declare a climate emergency. In May 2019, the UK Parliament made a climate emergency declaration (CED) and around this time many local authorities followed suit.
4. By 2018 local authorities throughout the world began declaring a climate emergency. In November 2018, Bristol City Council became the first UK public authority to declare a climate emergency. The Mayor of London, Sadiq Khan, followed suit one

¹ <https://climateemergencydeclaration.org/>

month later, committing to make London “zero-carbon”² by 2050, with a goal of becoming “carbon neutral” by 2030.³ The London declaration followed a major report published by the 2018 UN Intergovernmental Panel on Climate Change (IPCC) report. The analysis below shows that during 2019, most London boroughs made a climate emergency declaration, which is consistent with a brief review of local authorities across the UK. Many London boroughs have set what appear to be ambitious targets to become “zero carbon” or “carbon neutral” by 2030. The UK's national target has been set at “net zero” carbon emissions by 2050 under s. 1 of the Climate Change Act 2008 (as amended).⁴ Although, as is clear from the legislation, net zero does not mean “no carbon emissions” but instead aims to limit such emissions to carbon emissions known to exist at 1990 (the baseline year)⁵.

5. Despite ambitious targets, CEDs have been criticised for being little more than a grand rhetorical device, without the authority or political will to deliver what they promise.⁶
6. The purpose of this report is to draw together the research of identifying and analysing the status of CEDs across the 32 London boroughs, the City of London and the Greater London Authority, including any action taken to implement their ambitions. From there, it is important to determine which authorities have, in fact, made declarations and what progress may have been achieved as a consequence. This information will assist ELF in identifying areas of focus that require positive action.
7. This has been done through desktop research and information obtained from requests under the Environmental Information Regulations 2004 (EIR 2004). The report provides background information, methodology, a quantitative and qualitative review of the desktop research, the procedural aspects of requesting information under the EIR 2004, the key findings for each public body, as well as findings

² by definition, net-zero refers to a stage where no carbon is emitted in the first place, e.g., a business runs entirely on renewable energies and has phased out the use of fossil fuels entirely.

³ <https://twitter.com/MayorofLondon/status/1152882513406246913?s=20>

⁴ <https://www.gov.uk/government/news/uk-enshrines-new-target-in-law-to-slash-emissions-by-78-by-2035>

⁵ Section 1(1) of the Climate Change Act 2008 (as amended by the Climate Change Act 2008 (2050 Target Amendment) Order 2019/1056 art.2(2)): “It is the duty of the Secretary of State to ensure that the net UK carbon account for the year 2050 is at least 100% lower than the 1990 baseline. Section 1(2) “The 1990 baseline” means the aggregate amount of- (a) net UK emissions of carbon dioxide for that year, and (b) net UK emissions of each of the other targeted greenhouse gases for the year that is the base year for that gas.”

⁶ <https://www.bennettinstitute.cam.ac.uk/blog/climate-emergency-pragmatism-and-fatalism-policy-a/>;
<https://www.globalwitness.org/en/blog/two-years-on-from-the-uks-declaration-of-climate-emergency-we-need-less-bluster-and-more-action-from-the-uk-government/>

regarding specific factors (e.g., community involvement in the climate emergency and commitment to targets)

8. This report uses the terms such as “boroughs” and “borough councils” and “local authority (LA)” interchangeably to discuss the 32 London boroughs, the City of London and the Greater London Authority. London boroughs are elected every four years and are responsible for running most of day-to-day services and local issues, including environment matters, roads and many land use planning matters⁷. A list of the authorities surveyed is provided at Annex 2.

Background to the Report

9. The research has been undertaken by student researchers as part of City Law School’s Environmental Law Policy Clinic. The Policy Clinic is made up of primarily post-graduate students in either full or part-time study with an interest in environmental law and practice, working *pro bono* [“the researchers”].
10. Work on the project began in December 2020. Two researchers, Odette Chalaby and Simukai Dzuda, led and co-ordinated the project as Student Directors. Leila Cazaly took over from Odette Chalaby as Student Director partway through the project.
11. It should be noted that this report has been authored by multiple researchers. Accordingly, the views expressed may not reflect the views of each researcher, however, the researchers have attempted to highlight specific areas and find consensus on key findings. The CLS project team and researchers are provided at Annex 1.
12. A starting point for the report was a review of the online information provided by Climate Emergency UK and their website: *Declare a Climate Emergency* whose focus is, among other things, to create “a database of UK Local Authority climate & ecological emergency declarations and action plans to help interested parties quickly identify best practice”.⁸

⁷ Other areas of responsibility include education, housing, highways, transport planning, social care, libraries, leisure and recreation, waste collection and disposal, planning applications, and local taxation collection. The Greater London Authority is responsible for highways, transport planning, passenger transport and strategic planning.

⁸ <https://www.climateemergency.uk/>

13. The researchers are grateful for the support and assistance from the Assistant Dean for Clinical Legal Education, Ffyon Reilly, the Pro Bono Co-ordinator, Paula Allen and the Visiting Lecturer and the project supervisor, Dr Paul Stookes. Further, the researchers are grateful to all local authorities surveyed which returned the requested information to us promptly and fully in response to the Environmental Information requests (EI requests).

The Need for a Climate Emergency Declaration

14. There is no universally accepted definition of a climate emergency declaration (CED). A CED can reflect two things. Firstly, it can demonstrate an acknowledgement that climate change is a real and serious problem requiring urgent attention, without which it will be too late to meaningfully solve the problem. Secondly, it can demonstrate a commitment to act against climate change. It can act as an impetus for change and as a yardstick to both monitor and measure progress. The work involved in pursuing and making a CED may be instrumental in cultivating the political will required to implement real changes towards reducing the effect of climate change.
15. It can therefore be proposed that the overall function of the CEDs is to act as a first step from which climate change can be addressed meaningfully. Acknowledgement of the climate crisis by means of a CED will hopefully lead to practical steps being taken towards addressing climate change, particularly by reducing carbon emissions.

Methodology

16. The research was completed across two student teams in four stages:
 - 1) Initial desktop surveys
 - 2) Environmental Information requests
 - 3) Consolidation of surveys
 - 4) Analysis of (1) - (3)
17. Working as a large team of pro bono researchers, good communication was essential. Regular meetings were held to track progress and discuss challenges as well as key findings. The student directors were responsible for organising and managing the team, which they did by creating rotas and assigning tasks.

1) *Initial Desktop Surveys*

18. The initial desktop research was completed over several weeks. A research survey form was developed internally by the Pro Bono Coordinator and project supervisor using Microsoft Excel (see Annex 3) and used by each researcher as a template/model. The form set out key research areas which were informed by ELF's terms of reference (Annex 5). Information was recorded under the following categories: "Base Data"; "Climate Emergency Declaration/Action Strategy"; "Specific Planned Actions"; "Offsets"; "Stakeholder/Community Involvement"; "Climate Change Adaptation"; and "Implementations". Researchers received guidance from the project supervisor on how to fill out the form effectively and consistently.
19. The team leaders assigned each researcher at least three boroughs to survey. Each researcher then reviewed publicly available information in respect of each council's climate commitments to input into the survey form and used an additional 'notes' column to include references and additional comments to explain the data being recorded as well as initial analysis for discussion (e.g., the ease of access of particular documents or information).

2) *Environmental information requests*

20. Following the completion of the initial research, each researcher identified gaps in the information and drafted an EI request for each borough. Under Regulation 5(1) of the EIR 2004, a public authority has a duty to make environmental information on request. Such information must be made available "as soon as possible and no later than 20 working days after the date of the receipt of the request" (5(2) EIR 2004).
21. To ensure consistency in approach, the team leaders drafted an initial model EI request that could be adapted according to the initial research findings. Researchers subsequently worked in pairs as part of a peer review process to review draft EI requests before they were submitted to the relevant borough. Each EI request was allocated a reference number and its progress was monitored using a bespoke table on Microsoft Excel to determine when a response was expected to be received under the statutory limit of 20 working days.

3) Consolidation of Survey Results and EI Responses

22. Once a borough responded to an EI request, the assigned researcher consolidated the information received to the initial survey form for that borough in a way in which the source of the information could be identified.

4) Analysis

23. Once the information from the desktop research and the EI responses had been received or a reasonable time to respond to any request had been provided, there was further analysis and evaluation of the information obtained to date. The analysis and information evaluation formed the basis for this report.

2. ENVIRONMENTAL INFORMATION REQUESTS

24. In total, the researchers sent out 33 EI requests to different London boroughs. The nature and extent of the requests was informed by the level of information that appeared to be available on each council's website and which had informed the desktop research. There were five broad types of requests made:
- 1) to authorities who did not appear to have a CED nor had taken any action on addressing climate change concerns, e.g., Bexley;
 - 2) to authorities who were taking climate change action but who had not made a CED e.g., Barnet;
 - 3) to authorities who had made a CED but did not appear to be taking any material steps to progress the declaration' e.g., Hammersmith and Fulham;
 - 4) to authorities who had made a CED and appeared to be taking some material action e.g., Wandsworth and;
 - 5) to authorities who had made a CED and who appeared to be taking acting steps to address the concerns, e.g., Lambeth.
25. At the time of writing, the researchers had received 28 responses to the EI requests⁹. The majority of responses were received within the 20 working days statutory limit,

⁹ The boroughs who did not respond to the EI requests before the time of writing this report are: Barking and Dagenham, Bexley, Haringey (despite repeated requests), Havering, and Lewisham.

with five boroughs requiring longer or an additional 20 working days.¹⁰ Three boroughs had not responded within 40 working days.¹¹ Eight boroughs were sent follow-up emails for the EI requests. Four boroughs only responded to follow-up mails providing the requested information and four failed to respond and provide the information at all.

26. Some boroughs required an extension beyond the 20 working days to provide a response. Disruptions caused by COVID-19 was a common explanation for such delay. Some boroughs referred to the “complexity of the request” as the reason for the delayed response.
27. The researchers noted that some responses to EI requests were cautious and contained very brief answers. For instance, regarding community involvement, Enfield only referred to “ongoing engagement with various stakeholders on specific elements of the plan and related activities” but provided no further details. This is interesting, given that Enfield has made good progress on the issue by declaring a CED and preparing a very detailed Climate Action Plan.
28. By contrast, some boroughs which have so far not shown extensive climate engagement would provide more detailed feedback in their responses. For example, Barnet, of which little publicly available information about its climate engagement was found, provided a full response to the EI request. Barnet has not made a CED, nor adopted a climate change strategy and its response revealed only a few, limited, actions towards lower carbon emissions had been implemented, such as the installation of e-vehicle charging points or the planting of trees.
29. In some cases, the response to the EI request was limited because the borough in question was in the process of drafting or adopting their post-CED action plan. When responding to the EI request, many boroughs would refer to data assessment, scoping and modelling as part of the ongoing drafting/adaptation process and could not provide a specific answer at the time of the EI request. This is a point explored below.

¹⁰ Barnet; Greenwich; Hillingdon; Tower Hamlets.

¹¹ Lewisham, Havering and Bexley

3. KEY FINDINGS

30. There is a wide divergence in timescales to tackle the climate emergency. Some boroughs are already implementing adopted action plans, some are at the plan drafting stage, and some are yet to make CEDs.

Climate Emergency Declarations

31. Of the 34 local authorities reviewed (including the Greater London Authority and the London Assembly), 29 have made a CED. The majority of declarations (24) were made from December 2018 to February 2020 with the London Assembly first, followed by Lambeth, Hillingdon, Kensington and Kingston each making a CED in January 2020.
32. Five boroughs do not appear to have made their own CED (Barnet, Bromley, Bexley, Havering and City of London). If these remaining boroughs have made a CED then this was not evident from the extensive desktop analysis that was undertaken, and arguably more effort was required to actively disseminate environmental information in this area (as required under Reg. 4(1)(a) of the EI Regulations 2004) to:
- “... progressively make [the] information available to the public by electronic means which are easily accessible; ...”
33. Many CEDs were drafted in a way which showed that the borough recognised that climate change is a real and serious problem requiring urgent attention. Some boroughs, such as Ealing, cited UN reports and scientific studies as the reasoning behind the decision to make a declaration. Although they have not made a CED, Barnet has recognised that UK Parliament agreed a motion declaring an environment and climate emergency¹² and noted that the same environmental challenges that are faced by the UK are also faced in Barnet. While Sutton commented that “the evidence of the impact of global warming is now undeniable”.
34. Sutton was also an example of a borough which commented on the need for top-down action and leadership needed at national government level to facilitate real

¹² See e.g., *Parliamentary debates* (Hansard) for Wednesday 1.5.19 pp. 225-317 with the declaration at p. 317.

change. In its CED it noted that “Government must help boroughs like Sutton if we are to make a real difference nationally”.

35. Tower Hamlets have framed the effects of climate change as a social justice issue affecting its residents. In its CED it stated that 40% of residents in the borough live in areas which breach EU and government guidance on safe levels of air pollution and cited a recent scientific study (not named) which showed that children in Tower Hamlets have up to 10% less lung capacity than normal. The CED noted Tower Hamlets’ ongoing work to tackle poor air quality and states that the Council believes that air quality is a “social justice issue.” The CED resolved the Council to develop a Carbon Neutral Plan and pledged a “Tower Hamlets Climate Emergency Annual Report” to detail progress against this plan.
36. Many boroughs followed the lead of the Mayor of London. For example, Croydon’s CED included the target for Croydon Council to become carbon neutral by 2030, and to work with the Mayor of London to meet the aim for London to be a zero-carbon city by 2050. However, some boroughs introduced their own time scales. Wandsworth declared a climate emergency resolving to be carbon neutral as an organisation by 2030, carbon zero by 2050 and the greenest inner-London council by 2030.
37. There were some examples of CEDs being made, in part, because of pressure from environmental campaigns. For example, Enfield made a CED in 2019 emphasising the need to redouble efforts to make the borough as carbon neutral as possible, which followed local pressure which drew attention to the situation in Enfield. In Hammersmith and Fulham, the declaration was made at the same time as local residents staged a protest at the town hall. However, such pressure was not always successful. In Havering, a motion to declare a Climate Change Emergency failed to attract sufficient support at a Council meeting of 10 July 2019.
38. Some CEDs contained specific commitments to change within each individual council. For example:
 - Hammersmith and Fulham pledged to establish a Climate and Ecology Unit.
 - Greenwich pledged to make the council free of single-use plastics by 2020.
 - Hillingdon’s CED committed the Council to achieve 100% clean energy across the Council’s services by 2030.

- Ealing stated in their CED that all local, regional, and national governments have a duty to act against climate change, noting that urban areas are uniquely placed to be able to address the issue. The borough also affirmed its commitment to fighting climate change, as set out in its climate change manifesto.
- Greenwich made a CED on 26 June 2019, resolving to make the Royal Borough carbon neutral by 2030 by reviewing and updating its existing Greener Greenwich Strategy and creating a “Greenwich Partnership” to focus on climate change.¹³ It also contained a series of fairly general pledges to “explore all opportunities to divest our pension funds, and work to ensure that wherever possible any future investments are assessed against these principles”, to “ensure that sustainability is central to our Procurement strategy”, and finally to make the council free of single-use plastics by 2020 and “work towards” reducing the use of single-use plastics across all council buildings.

39. Finally, there was some evidence of empty declarations, or in other words, declarations which contained grand statements, but which have not been followed up with any particular action. An example of this was Barking and Dagenham, which has not published a climate action plan or strategy since making a CED in February 2020, committing them to “do everything in their power” to become a greener borough.

Climate Action Plans

40. The desktop research showed that more than half of the local authorities surveyed (18 in total) have put in place a climate change action plan or strategy to reduce emissions. However, it appeared that at least nine London boroughs had no plan or strategy to tackle climate change at all. Many boroughs appear to be in the planning, drafting or adoption phase of their climate action plans, post-CED. For example, at the time of writing:

- Hammersmith and Fulham intended to publish a strategy in 2021.
- Hillingdon was consulting on its new Strategic Climate Action Plan.
- Waltham Forest stated that it planned to publish a formal climate action plan in 2021. In the interim, its climate change strategy, published in 2008, was the adopted document.

¹³ Available

- Hackney was in the process of adopting a 'Net Zero Strategy'. In its EI response, the borough referred to a number of existing public documents, e.g., the Local Plan and the recently approved London Plan of the Mayor of London and emphasised its plan to develop a series of Climate Action Plans which were to commence in autumn 2021 and be completed in spring 2022.
 - Southwark intended to publish its final strategy in July 2021, having published a draft strategy in July 2020.
 - Greenwich was to adopt its draft Carbon Neutral Plan 2021-2030 following public consultation.
 - Croydon was planning to develop a fully costed action plan in autumn 2021 following the presentation of its formal response to the findings of the Croydon Climate Crisis Commission.
41. Some boroughs had already published detailed plans, including Tower Hamlets, Enfield, Harrow and Lewisham. Several boroughs hired external consultants to produce or contribute towards their action plans, including Hounslow and Tower Hamlets.
- Harrow had published a comprehensive 46-page action plan in 2019, outlining its 5-year strategy. The Council had specified planned actions that fell under each emission scope, although further information on this was awaited.
 - Lewisham had also published a highly detailed strategy that included planned carbon reductions in ktCO₂ that would be achieved by each planned action. Lewisham had calculated three separate forecasts for reductions: 'Core Actions' includes those actions which were deemed within the current scope of Lewisham Council and other stakeholders over a 10 year horizon; 'Radical Stretch' containing actions which either extended significantly the actions under the Core Action scenario or assumed wholesale new actions on individual sectors; finally, 'Systemic Change' based on projects for which emission reductions had been assigned but the means of achieving them were perhaps not well defined, or where new technology or significant infrastructure would be required. Under the Systemic Change scenario, it was estimated that emissions in the borough would be reduced to 122kt CO₂e, a reduction of 80% from the baseline.
42. There was some discrepancy within the scope of planned actions and strategies. Some boroughs made a clear distinction between a council's own emissions and

borough-wide emissions limiting their actions to reducing the carbon footprint of the specific council. For instance, Tower Hamlets differentiated between its plan to reduce carbon emissions directly by the Council in 2025 and across the “district” in 2050 (which followed the target set by the Climate Change Act 2008). Its plan to reduce council emissions consisted of specific and time-limited actions, such as to retrofit existing buildings owned and operated by the Council, to use electric cars and vans and low-emission alternatives for the Council’s lorries, to use renewable energy sources and introduce tree planting schemes, and to review its procurement policies. However, its borough-wide plan was more aspirational and contained fewer specific actions.

43. Generally, there were very few examples of boroughs who had taken very little action in respect to climate considerations. In Bexley’s 'Shaping our future together 2017 to 2025' Corporate Plan, the environment is only minimally mentioned in a section entitled 'Clean and Green Local Places' and there was not one mention of the word 'climate'. Some small-scale actions had been taken such as increasing parkland and recycling. In 2011 Bexley had an Environmental Sustainability Strategy, which referred regularly to climate change but without any plan or action (e.g., reducing emissions). This appeared to have been abandoned.

Categories of planned actions

44. The desktop research found that the majority of specific climate change actions planned by London boroughs fell into five broad categories: power, buildings and infrastructure; transport; biodiversity; and decision-making systems. Many of these actions were identified as scheduled for completion the first part of the 2020s, with the most distant targets being around achieving net zero by 2030.
45. The most popular type of planned actions among the local authorities researched related to buildings, power, and infrastructure. Some 19 London boroughs, well over half, planned to improve energy efficiency in council buildings (whether through retrofitting, using renewable energy sources, or reducing energy use overall). Other common planned actions in this category included: implementing stricter energy standards for new buildings (nine boroughs); replacing streetlamps with LED bulbs (seven boroughs); introducing district heating (five boroughs); putting solar panels on council buildings (four boroughs); and making council buildings plastic-free (three boroughs).

46. The other main area of planned actions related to transport. Almost half of the London boroughs (14) planned to replace their council's own fleet with low emission or electric vehicles. Thirteen boroughs planned to introduce improved cycling or walking infrastructure in their area, with some building off improvements made to adapt to COVID-19. Nine boroughs planned to introduce e-vehicle charging points. Four planned to introduce new low emission buses and to make staff commuting more sustainable. Further examples include:
- Hillingdon's Draft Action Plan aimed to ensure that the Council's fleet of vehicles will be powered by clean energy.
 - Haringey's Action Plan aimed to reduce the carbon footprint of the Council to net zero by 2027. This also included specific actions and targets, including to improve energy efficiency in domestic buildings and reduce emissions from road transport by enabling a reduction of all petrol and diesel journeys of 50% by 2024.
 - Some of Lambeth's specific actions included improving the energy efficiency of the council's property portfolio (to EPC E by 2023), only leasing ultra-low emission vehicles by 2022 and aiming to increase the use of sustainable methods of transport for staff work journeys, such as through a pool bike scheme.
47. A less common but still notable area of specific planned actions is around biodiversity. Many local authorities had plans to "green" their area in some way, such as planting more trees, introducing new green spaces, or planting grasses on road verges. These projects sought to offset emissions by increasing carbon absorption. For example:
- Ealing has set ambitious targets for greening infrastructure and expanding green spaces in the borough.
 - Redbridge noted in its response to the EI request that the council was currently developing a Nature and Conservation Strategy and that offsetting will be considered in 2030.
48. Finally, a small but significant number of London authorities had plans to introduce concerns about climate change, or "green thinking," into their internal systems and decision-making processes. In particular, seven boroughs planned to introduce

sustainable procurement processes; three planned to make climate change an integral part of all council decision-making; and two planned to make their investment or pensions decisions more sustainable including Islington.

49. In many instances, the ambition outlined within the plans was impressive, and some boroughs had stated detailed reductions of specific actions. For example:

- Lewisham stated in its Climate Action Plan that the installation of an insulation package for social housing will achieve a reduction of 29 ktCO₂e. Its target to have an all-electric council fleet is planned to result in 1.1 ktCO₂e reductions.
- Haringey estimated that the measures outlined in its Action Plan could reduce emissions to 100kt CO₂e, which represents a reduction of over 90% from baseline figures.

50. However, often authorities did not appear to have mechanisms in place for monitoring progress or compliance with promises or goals and there was a discrepancy in reporting standards and emission projections. For instance, most London authorities did not currently report publicly on emissions in terms of the scope classifications of the Greenhouse Gas (GHG) Protocol, i.e., scope 1 (all direct emissions), scope 2 (indirect emissions), and scope 3 (other indirect emissions such as outsourced activities, waste disposal).

- Newham had not organised its emissions or declaration of emission reduction by scope and could not provide this information upon EI request.
- Waltham Forest stated that further information sought in the EI request in regard to reducing emissions per scope will be available in its updated strategy document.
- Southwark said that they would publish all details of their current emissions and their breakdown by scope in the Final Strategy and action plan; presently the only figures for emissions for the borough were from 2017, and totalled 1,013 ktCO₂e (the breakdown by GHG scope was not available).
- Enfield had not explicitly classified its planned emission reduction actions by scope and is not planning to do so in the future as per their response to the EIR request.

51. Such information could be broadly derived from categories of action, i.e., in Council offices and supported accommodation (Scope 1), emissions through purchased electricity, steam, heat and cooling (Scope 2) as well as emissions produced by all activity within the area, e.g., waste, transport, domestic and industry & commercial (Scope 3). However, it was clear that it remained difficult for the public to track the effect of any policies to reduce emissions if scopes were not explicitly considered and identified.
52. There appeared to be no indication that the key area of decision making including, for example, land use planning was currently within the scope of climate action. This is despite the fact that many boroughs acknowledged that there were two key areas of influence; a council's own area of influence (for example, through control and management of scope 1 – 3 emissions) and the borough wide emissions for which the Council had less control. Yet, it is submitted that if real and necessary change a carbon reduction is to be secured it will be those emissions beyond Scope 3 (perhaps Scope 4 emissions) where real change will come into play with decision-making being influenced by a commitment to climate emergency and where, for example, the targets in an environmental action plan will be at the very least a material planning consideration.

Implementation of Climate Action Plans

53. There were several examples of boroughs who had reported some implementation pre-CED climate action plans. Most boroughs had existing strategies and actions to tackle climate change prior to making a CED (with many boroughs noting that they were obliged to have an Air Quality Action Plan under Environment Act 1995). However, the researchers understand that air quality action plans did not cover CO₂ emissions but focused on particulates and nitrogen dioxide NO₂ emissions with a key concern being the health impacts of air pollution rather than the need to reduce greenhouse gas emissions. Some examples of pre-CED strategies include:
- Hammersmith and Fulham had pursued multiple green strategies since 2016, which focus on transport, recycling, and infrastructure.
 - Waltham Forest had published three climate change documents in the last 13 years. Its "Call to Action" document, in particular, set out useful, up-to-date issues and recommendations. However, it had not published a formal climate change response since its "Climate Change Strategy 2008".

- Tower Hamlets had several plans and strategies associated with climate change in place prior to its CED, including a Waste Management Strategy (2018-2030), and Environmental Strategy and a Local Biodiversity Action Plan.
54. In some cases, there was evidence of previous and existing strategies to tackle climate change but limited information with regards to their implementation. For example, it was unclear what action had been taken in respect to Hillingdon's 2009 Climate Change Strategy and whether its policy targets had been achieved.
55. It was common for existing actions of councils to be incorporated into post-CED climate change strategies and reporting on implementation. For example, in the EI request to Harrow, the Council was asked if it had entered into a contract for the implementation of any specified action on climate change. The EI response from Harrow was that it had taken significant steps to reduce carbon emissions in the borough in the past few years, including the completion of several renewable energy projects, installing electric vehicle charging points at key sites, and purchasing zero emission electric vehicles.
56. A couple of boroughs who had not made a CED had either existing climate change strategies or were taking action to address climate change.
- Barnet had not made a CED and there was no existing climate action plan. It did, however, frequently report on measures implemented which target climate change. For example, installing vehicle charging points, tree planting, and commitment to the STARS (Sustainable Travel to and from Schools that is Active, Responsible and Safe) certification.
 - Havering had not made a CED but had published a Climate Action Strategy in 2014. This Strategy aimed to reduce Havering Council's own CO₂ emissions by 1% year on year; to reduce the borough's CO₂ emissions by 3% year on year, with a particular focus on efforts to reduce emissions in the domestic and transport sectors; and to improve the borough's ability to deal with the impacts of climate change.
57. Of those boroughs who have made a CED, some implementation progress is noteworthy:

- Camden has switched 50% of its street lighting to LED, its target for completing this action 100% is 2023. The borough noted that this action had (to the date of response) achieved a 1,050-tonne CO₂e reduction in annual GHG emissions. Camden has also introduced meat free Mondays in Council catering contracts and made its vehicle fleet 100% low/zero emission.
- Enfield has already implemented some of its measures, e.g., retrofitted some council buildings with low carbon energy generation measures, started a programme to retrofit streetlamps with LED bulbs, removed single plastic cups from council buildings and built over 30 km of cycle routes.
- Lewisham has successfully secured government funding in order to implement aspects of its action plans, including a grant of £3.7 million from central government to fund the retrofitting of 165 Lewisham Home properties, community centres and adult learning centres to support energy efficiency. The availability of funding to implement measures was a key issue to follow moving forwards, as it would have a significant impact on the relative feasibility or difficulty of boroughs implementing measures pursuant to their climate action strategies.
- Lewisham has also successfully launched a new Community Energy Fund offering up to £15,000 one-off grants to local community initiatives to support energy efficiency and carbon reduction projects, such as solar panels on community buildings. Additionally, the borough has joined Solar Together, a community-based bulk-purchasing initiative to help Londoners access lower costs for solar panels. Furthermore, they say that they have supported 2,895 low income and vulnerable households with practical advice on staying warm and cutting the cost of energy and secured £435,000 external funding in 2020/21 for fuel poverty advice services across South London.
- Lambeth has entered into a contract for implementation of part of its Climate Action Strategy, in appointing a provider to deliver retrofitting works on Lambeth Schools. Alongside this contract, Lambeth has also completed a number of actions with regards to their climate strategy, with 24 fossil fuel vehicles replaced by electric vehicles, a 130% increase in pool bike usage by staff for work journeys, and all of the lighting on highways having been replaced with LEDs.
- The Royal Borough of Kensington and Chelsea has continued to reduce emissions from their contractor's waste collection and street cleaning vehicles, which has achieved a 35% reduction in CO₂ compared to the levels of 2007-8. Kensington and Chelsea has also taken several actions within schools in their borough, namely ensuring that the boilers in those schools were set up and

controlled to better reduce emissions, as well as insulating the heating systems in schools. These actions were said to have effected reductions of 185 tonnes of CO₂ and 75 tonnes of CO₂ respectively.

- Newham began a successful trial of weekly recycling, accepting a wider range of materials for recycling; this trial was intended to be rolled out across the entirety of the borough in 2021. Newham had also provided c.100 housing blocks with user friendly recycle bins when previously these buildings had no recycling facilities.
- Westminster has achieved their target of installing 1000 electric vehicle (EV) charging points in the City to support the use of EVs.
- Tower Hamlets has retrofitted the first four buildings owned and operated by the Council (of a planned 15) after receiving funding from the Public Sector Decarbonisation Scheme, with the rest of the buildings being assessed. A project to replace all inefficient street and car park lighting with efficient LEDs had been completed. The tree planting scheme had resulted in 600 (out of 1000) new trees being planted. Many action points were at the costs assessment stage, with either a costed plan being prepared or proposed, including an electric car replacement plan, the preparation of a plan to install electric charging points.

58. From the reporting that was currently available, it was clear that some planned actions would not be implemented in full. For example, although Tower Hamlets committed to a Zero Carbon Plan for the new Town Hall, the EI response indicated that it may not be possible to achieve this as the new Town Hall would be a refurbishment of a Victorian building.
59. Overall, the research suggested very different findings in terms of strategies or policies around climate change *adaptation*. The majority of London boroughs did not have publicly available plans for climate change adaptation; both in general terms and in relation to specific the issues of flooding and overheating. Some did note, however, that they are involved in developing a London-wide climate change adaptation and resilience strategy, to be published by 2023.

Green Decision Making and Engagement

60. There is evidence that sustainability and green decision-making is being incorporated into the activities of London boroughs. Many boroughs had established specific staff

teams or council working groups which were responsible for the implementation of related activities. For example:

- Bromley has incorporated green decision making into its COVID-19 recovery work. Council officers were now involved in the Green Recovery Working Group, the aim of which was to pair recovery from COVID-19 with shaping policy which put climate and ecology at its forefront. In its EI response, Bromley stated that this would be achieved by appraising and aligning all major services' current operations to cover environmental, social and economic improvements but provided no further information as to whether the working group had made any progress.
- Hammersmith & Fulham has established a Climate and Ecology Unit, a commitment contained within their CED, whose contact details would be published once the website has been updated. Hackney had established a carbon literacy training programme for direct employees to raise awareness and support their participation in activities that can make an impact on its net zero targets.

Use of Carbon Offsets

61. Many boroughs did not currently offset their carbon emissions, including Ealing, Sutton and Islington. Richmond was one of the few boroughs to use a carbon offset fund and Southwark claimed that this would be considered in their climate action plan due to be published in July 2021.

Impact of COVID-19

62. Some boroughs highlighted the difficulty of the COVID-19 pandemic in implementing their planned actions. This appeared to be particularly in the context of the shift of council staff to working from home. For example, Tower Hamlets stated that they were unable to assess the feasibility and impact of its waste management improvements (installing food waste bins in council buildings) until council employees return to in-person work.

Community Engagement

63. The desktop research identified a wide divergence of approaches to community involvement in developing their climate change policy across London. As with the more general findings, a number of authorities (8) appeared to have no provision for

community involvement, and some (7) simply stated an ambition to involve the public without any concrete commitment. However, more than half the London boroughs had taken concrete steps to involve the public in action on climate change.

64. Some 14 authorities had held a public consultation on climate change or allowed the public to feed into their climate action plan or strategy. Further, five authorities (Brent, Camden, Croydon, Hackney and Lambeth) had run or planned to run specific Citizens Assemblies to shape their action on climate change. Some 14 authorities had already held a public consultation on climate change or allowed the public to feed into their climate action plan or strategy. Many boroughs have conducted specific consultation exercises regarding its post-CED climate action strategy.
- In Greenwich, the Greenwich Carbon Neutral Plan has been open for public consultation to 7 March 2021 and was to be adopted by the Council in summer 2021.¹⁴ The Plan contained several “ambitions” across seven categories: Buildings, Transport, New Development, Energy Supply, Circular Economy, the Natural Environment and Empowering Wider Change.
 - In Croydon, following its CED, the Council held a Citizen’s Assembly on Climate Change between January-February 2020 and launched the Croydon Climate Crisis Commission (CCCC) in March 2020. In January 2021 a public consultation in the form of an online survey was held on the CCCC’s draft recommendations for two weeks, with the CCCC report and the Council’s immediate response was due to be presented to Cabinet on 7 June 2021. After this a fully costed action plan would be developed and presented to a future meeting of Cabinet in autumn 2021. It should be noted that although the report and recommendations of the CCCC was welcomed they had not been adopted and therefore appeared to be subject to the forthcoming action plan prepared by the Council.¹⁵
 - Islington had published its draft Net Zero Strategy by 2030 for consultation which included a key theme of ‘Engaging, Empowering and Partnering Others’ as well as a proposal to decarbonise our Pension Fund’s investments by 2022, by reducing the fund’s exposure to carbon emissions and reducing the fund’s equities exposure to fossil fuel reserves.

¹⁴ <https://s3-eu-west-2.amazonaws.com/commonplace-customer-assets/carbonneutralgreenwich/Greenwich%20Carbon%20Neutral%20Plan.pdf>

¹⁵ <https://democracy.croydon.gov.uk/documents/s29560/Appendix%202%20CCCC%20Report%20and%20Recommendations.pdf>

- Southwark stated that they planned to run a Citizens' Jury on their plan once it was adopted to ensure further engagement from the community on the specific detail of the plan; they emphasised that community engagement was central to their approach to tackling the climate emergency.

65. Some boroughs detailed their broader engagement activities outside of its post-CED climate action plan. More than half the London boroughs had taken or were planning to take concrete steps to involve the public in action on climate change or otherwise detailed their engagement activities. These included:

- Citizens Assemblies (Brent, Camden, Croydon, and Hackney).
- Working with businesses. Hackney provided an advice scheme for businesses at specific trading locations.
- Community events. Hackney was due to hold a community event in July 2021 which would target marginalised communities. Wandsworth held its first (online) Climate Summit in November 2020 in partnership with local groups.
- Working with schools. Wandsworth planned to raise awareness of climate change in schools by developing a toolkit.
- Southwark had set up an online engagement hub, community workshops and pop-up events in borough parks and distributed information through online media, Southwark life magazine and resident newsletters, alongside hosting a public climate change conference.

4. CONCLUSIONS

66. With 29 of 34 local authorities¹⁶ (over 86%) making a CED, above the UK average of around 75% of all local authorities¹⁷ it is clear that the large majority of London boroughs have initiated a serious response to tackling the climate emergency. There has been some significant work and development carried out, or planned, towards reducing carbon (and equivalent) emissions.. Further, it is clear from a review that while some authorities had not formally made a CED, there was good work being

¹⁶ 32 boroughs, the City of London and the GLA (see Annex 2 list)

¹⁷ There are understood to be 343 local authorities in England, 11 in Northern Ireland, 32 in Scotland and 22 in Wales; a total of 408. To date, ClimateEmergencyUK states that there are 310 councils that have made a climate emergency (310/408 = 75.98%.(last accessed 10/5/2021). Although this may be subject to change to due recent mergers with public bodies e.g., in the East Midlands area.

carried on in order to tackle GHG emissions and work towards a net zero target: see for example, the adoption of a climate strategy by the City of London in October 2020 and a commitment to net zero in scope 1 and 2 emissions by 2027.

67. It is also clear that although there was some evidence of “empty declarations”, in other words, a CED that had appeared not to have been followed through (such as with Barking & Dagenham), the majority (over half) of boroughs had progressed from their CED to developing a strategy and action plan to reduce carbon emissions with some boroughs working on publishing a plan of action during 2021: see, for example, Hammersmith & Fulham, Hillingdon and Waltham Forest.
68. Some boroughs appeared to be progressive in responding to the climate emergency. For instance, Camden was already pursuing key objectives, having already switched 50% of its street lighting to LED (with plans to complete this action to 100% in 2023). It had also introduced meat free Mondays in Council catering contracts and had made its vehicle fleet 100% low/zero emission. Similarly, Lewisham’s plans for social housing insulation and an all-electric council fleet appeared impressive, while Haringey estimated its action plan measures would reduce CO₂ emissions from over 90% from baseline figures.
69. However, if real and influential steps are to be secured in carbon reduction, it will be the ability to reduce those emissions way beyond Scope 1-3 emissions and where , for example, the objectives and targets in an environmental action plan will be, at the very least, a material planning consideration.
70. In terms of community involvement there appeared to be divergence across London, although over half the boroughs had taken active steps to involve the public in climate change action holding public consultation events.
71. There were very few examples of boroughs who had taken very little action in respect to climate considerations. It is appropriate to note that some climate action across London had stalled for a number of months as a result of the COVID-19 pandemic.
72. It was clear from the research that climate action benefit from funding and financial support. This includes the work carried out by Lewisham following government funding support to implement action and the call by Hammersmith & Fulham for funding to support its climate programme. It is evident that some additional resources

will be required to ensure that the CEDs and the action that should follow is properly financed whether this is to engage experienced staff and/or effectively train and upskill existing staff or to provide capital for energy efficient projects.

73. Overall this research has provided an extremely insightful snapshot into the emerging and justifiable concerns about the climate emergency and that very many public bodies, officers and councillors are taking this seriously across Greater London. However, there is still considerable work to be done in ensuring all local councils are effectively securing carbon reduction. It should be recognised that efforts by public bodies to reduce their own emissions is just the start and there is a need to work along local communities, businesses and others in civil society if real change is to be secured.
74. The very latest extreme weather events including flash floods and heat in our areas and beyond (including the tragic loss of life in Germany and Belgium) brings this into sharp focus. It will be critical to build on the momentum in play to ensure that all public bodies follow and meet the efforts and work of the current leading authorities and that central and regional government properly resources the necessary work to be carried on. What is plain is that meaningful work and action on carbon reduction has multiple sustainability benefits such as warm homes, better quality air, greener and more attractive open spaces with greater biodiversity.
75. Key work in the coming months will be to engage and work alongside the leading councils as well as those struggling to put the climate emergency commitments into action.
76. Finally, this project has been undertaken by students working unpaid but very concerned about their future in London and beyond. With the knowledge they have and understanding they have secured they have the ability to help secure the change that is required. They do ask that their concerns be taken seriously – now, not tomorrow.

ANNEXES

ANNEX 1

Project team

Team 1

Simukai Dzuda (Director)
Leila Cazaly (Director)
Milly Charleson-Gallacher
Josie Fathers
Annie Higgo

Team 2

Odette Chalaby (Director)
Maja Berger
Marina Heilbrunn
Anna Moody
Harley Ronan
Emily Wolf

Pro Bono Coordinator
Paula Allen

Project Supervisor
Dr Paul Stookes

Assistant Dean Clinical Legal Education
Ffyon Reilly, Barrister

London authorities reviewed

Barking and Dagenham - <https://www.lbdd.gov.uk/>
Barnet - <https://www.barnet.gov.uk/>
Bexley - <https://www.bexley.gov.uk/>
Brent - <https://www.brent.gov.uk/>
Bromley - <https://www.bromley.gov.uk/site/>
Camden - <https://www.camden.gov.uk/>
City of London - <https://www.cityoflondon.gov.uk/>
Croydon - <https://www.croydon.gov.uk/>
Ealing - <https://www.ealing.gov.uk/site/>
Enfield - <https://new.enfield.gov.uk/>
Greater London Assembly - <https://www.london.gov.uk/about-us/london-assembly>
Greenwich - <https://www.royalgreenwich.gov.uk/>
Hackney - <https://hackney.gov.uk/>
Hammersmith and Fulham - <https://www.lbhf.gov.uk/>
Haringey - <https://www.haringey.gov.uk/>
Harrow - <https://www.harrow.gov.uk/>
Havering - <https://www.havering.gov.uk/>
Hillingdon - <https://www.hillingdon.gov.uk/>
Hounslow - <https://www.hounslow.gov.uk/site/>
Islington - <https://www.islington.gov.uk/>
Kingston upon Thames - <https://www.kingston.gov.uk/>
Lambeth - <https://beta.lambeth.gov.uk/>
Lewisham - <https://lewisham.gov.uk/>
Merton - <https://www.merton.gov.uk/>
Newham - <https://www.newham.gov.uk/>
Redbridge - <https://www.redbridge.gov.uk/>
Richmond upon Thames - <https://www.richmond.gov.uk/>
Royal Borough of Kensington and Chelsea - <https://www.rbkc.gov.uk/>
Southwark - <https://www.southwark.gov.uk/>
Sutton - <https://www.sutton.gov.uk/>
Tower Hamlets - <https://www.towerhamlets.gov.uk/Home.aspx>
Waltham Forest - <https://www.walthamforest.gov.uk/>
Wandsworth - <https://www.wandsworth.gov.uk/>
Westminster - <https://www.westminster.gov.uk/>

Example survey form

City University Climate Action Survey	Response	Notes
Base data		
Borough		
Researcher		
Politics Conservative, Labour....		
Population		
Name of Chief Executive or equivalent		
Email address of Chief Executive or equivalent		
Name of Leader of Council or equivalent		
Email address of Leader of council or equivalent		
Name for EIR Enquiries		
Email for EIR Enquiries		
Name for FOI Enquiries		
Email for FOI Enquiries		
Climate Emergency Declaration/ Action Strategy		
Has the Authority made a Climate Emergency Declaration?		
Where is it (web link)		
Date of Declaration		
Authority of declaration. Full council, Committee, Officer...		
Summary of Declaration, to include reasons for making the Declaration		
Has the Authority published a Climate Action Strategy?		
Where is it (web link)		
Date of publication		
Authority for publication. Full council, Committee, Officer...		
Summary of the Climate Action Strategy? to include reasons for formulating the Declaration		
Declaration of emissions by Scope		
Scope 1 in ktCO ₂ e		
Scope 2 in ktCO ₂ e		
Scope 3 in ktCO ₂ e		
Declaration of reductions by Scope		
Amount of reduction in Scope 1 in %		
Amount of reduction in Scope 2 in %		
Amount of reduction in Scope 3 in %		

Sample of questions

Model environmental information request letter

Pro Bono Legal Clinic
City University
Northampton Square
Clerkenwell
London EC1V 0HB
Ref: ELF.CED.EI14

Information Officer,
Hammersmith & Fulham Council
Town Hall, King Street
Hammersmith
London W6 9JU

11 April 2021

Dear Information Officer,

Environmental information request re: Climate Change Emergency Declaration

We write as part of a national research project being undertaken by universities throughout the UK and being led by the Environmental Law Foundation (ELF) exploring the work in tackling climate change and GHG emissions. The research focuses on the climate change emergency declarations made by a large number of public bodies, including district and city councils, unitary authorities and Parliament, since 2018. We are seeking to track their development with a view on publishing the progress of public action on climate change in the lead up to COP26 in November 2021.

We have carried out some preliminary research of the London Boroughs and note that the London Borough of Hammersmith and Fulham made a CED on 17 July 2019.

In our research of your borough's environmental and climate policy, we note that your climate change declaration suggests your borough views environmental protection as an issue of paramount importance. This is evidenced by the contents of your declaration:

- i. The declaration cites the reports produced by the Intergovernmental Panel on Climate Change as well as the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services. The declaration also acknowledges global climate action already taking place before stating that there is a duty to act against climate change.
- ii. The declaration also says that there is a climate and biodiversity emergency. It resolves to set up a climate emergency unit and independent resident led climate change emergency commission.
- iii. The declaration also asks the chief executive to write to the Chancellor of the Exchequer informing the chancellor that the borough is concerned about climate change and biodiversity loss, and the impact that will have on the economy. In addition, the letter will ask for funding to implement borough ecological initiatives.

All of this is evidence of your commitment to tackling climate change. Further evidence of the borough's commitment is illustrated by the borough's climate change action plan.

In light of the above please provide the following information:

1. Since 2016, the borough has pursued a wide-ranging list of climate change related goals and targets. This includes the ambitious goal to become London's greenest borough and the creation of an air quality action plan. These policies appear to be different strands of what could be a climate action strategy. Please explain why you have not formalised a climate action strategy and written it up as a report?
2. The borough has not declared its emissions. Please declare your emissions in ktCO₂ in terms of the scope classifications for the GHG Protocol; scope 1 (all direct emissions), scope 2 (all indirect emissions), and scope 3 (other indirect emissions).

If you have not measured emissions in your borough, please explain why and confirm when you expect to provide figures.

3. Please explain specific actions the borough will take in efforts to lower scope 1, 2 and 3 emissions. If you cannot, please explain why and confirm when you expect to be able to provide this information.
4. Please provide details for any plans for purchase of carbon offsets and a planned offset framework. If you do not plan on using carbon offsets, please explain why and confirm when you expect to be able to provide this information.
5. Please explain how you propose to include stakeholders and the community in the borough's climate action strategy.
6. On the council's website, there is a 'we have', 'we will' format for a range of environmental actions that the borough has already implemented and wishes to implement in future. Please provide information about whether you have entered a contract for implementation.
7. The council does not provide any contact details about its Information Officer or the team that deals with environmental issues, including requests. Instead, there is an online form on your website. Please would you explain why this is your method for information provision, given that you have acknowledged the importance and urgency of the issue of climate change?

If you are able to provide the contact details of the person or persons in the team, please do. If you cannot, please explain why not and when you will be able to provide this information.

We recognise that under the Environmental Information Regulations 2004 the Council is entitled to charge a reasonable sum for providing this information. However, City University is carrying out this research on a pro bono basis and has no committed budget to cover any fee chargeable. Similarly, ELF is a charity working with a small budget and similarly has no funds to cover any fee. Moreover, we understand that the universities across the UK are working on a similar no-fee basis. In the circumstances, we ask that any potential fee is waived. In that regard we anticipate that much of the information will be readily available to the Council. However, if it is the case that some of the information involves detailed and lengthy research, then we ask that the readily available information be provided under this request.

We also understand that the Council has 20 working days to provide this information. We would very much welcome the information sought to be provided at the earliest opportunity and ask that the information be provided by email.

If you have any queries or would like to discuss the project or this particular information request further, then please do not hesitate to contact the Pro-Bono clinic on:

EnvironmentalLawClinic@city.ac.uk

We look forward to hearing from you.

Yours sincerely,

City University Pro Bono Clinic

ELF project terms & briefing note

1. Research and list the Local Authorities in this region, and classify them by the type of authority (County, City, District, Town, Parish etc)
2. Research on how many and which local authorities have made a Climate Emergency Declaration. You will list these and group them by type of authority
3. Research what status have local authorities given their Declarations?
4. What action have these local authorities taken so far to meet their Declaration ambitions? How are the Declarations influencing their decisions?
5. What further action do they need to take and by when to meet their Declaration ambitions? What changes, e.g. to local policy, are required to meet these ambitions?
6. Are any changes required at a national level e.g., to national policy, to facilitate the process? If so, what are these?
7. What are the opportunities for community involvement (at local or national level) in the decision-making processes for the changes necessary? What actions can local communities take to ensure effective involvement?
8. How have local authorities involved their communities in the decision-making processes around their Climate Emergency Declarations?