

WMCA Climate Action Plan – consultation response

Overarching questions

WMCA have specifically invited comment on four questions at the end of the Climate Action Plan. We briefly address some of those questions here, but subsequently expand on areas in which we have specific expertise.

1. Is anything missing: do the action areas provide the right impetus for change? Which policies, investments and changes do you think are the most important?

The proposed plan is comprehensive, and although is driven by the imperative to radically reduce carbon emissions, it successfully manages to make vital links to climate adaptation and nature-based solutions, circular economy and health and wellbeing. One area that is currently missing is a recognition of the importance of embodied carbon in the construction, maintenance and demolition of buildings and infrastructure. We expand on specific policies below. For all areas of the plan, the next challenge is of course moving beyond aspirational ‘example actions’ into concrete policy proposals and implementation.

2. Barriers and opportunities: many people, places and businesses in this region have been pushing for action on climate change for a long time now, or have been quietly and diligently delivering that change. What do you see as the main barriers to meeting the climate change challenge, and which opportunities are too good to miss?

The biggest barrier to meeting the climate change challenge for most UK cities is likely to be the difficulty of eliminating carbon emissions from the existing housing stock. This is so difficult because it will require direct intervention (very disruptive in many cases) in millions of people’s homes, and an unprecedented bringing together of finance solutions, policy incentives, regulation, skills, technology and behaviour change. Again, we expand upon this further below. However, the benefits are significant – in terms of fuel poverty, health, jobs etc. The benefits and opportunities for the city from all the interventions covered in the Plan are already well presented. Further useful evidence on the benefits can be seen in work around the Green New Deal: <https://neweconomics.org/about/our-missions/green-new-deal>

3. Accountability and governance: how do we ensure that we as a region do what is necessary to avert climate breakdown? Should WMCA and local councils have oversight of this, or do we need to create new partnerships?

This is a new situation for all cities and regions, and this will be a steep learning curve. There will need to be greater clarity about where precise powers sit – with the Combined Authority, local authorities or national government. The Plan at the moment leaves some of this quite open. It is critical that WMCA and local councils demonstrate leadership on this issue and are seen to have oversight. However, success will only occur through partnership between all sectors – business, communities, third sector, faith sector, academia, sport etc. The Manchester Climate Change Partnership model is one example which has had some success at bringing sectors together and agreeing roles and responsibilities, and is worth investigating in a West Midlands context.

4. Citizen involvement: people exercise their democratic rights at the ballot box, but there are many other ways for that to happen. Should we create a citizen’s assembly or similar, to shape and drive this work? Or are there better ways to involve people?

This is not an area on which UKGBC has specific expertise, although it is closely linked to the previous question. The proposed plan feels like it is rooted in the region – respecting and building on its heritage and psyche – but it needs to have longevity across political parties and political cycles, and one way of ensuring that is to build co-ownership amongst citizens. Again, this is new territory, and nobody necessarily

has the right answer, but there are various examples of cities that have run quite ambitious citizen engagement programmes that could be investigated. Manchester again, with the Mayor's Green Summit, which has run for two consecutive years, is one such example. Cambridge might also offer inspiration. Further afield Vancouver is a very good example of a mass engagement exercise to inform and take ownership of a city's environmental plan.

Specific policy areas

Reducing carbon emissions in existing homes and non-residential buildings

Introduction

Although the focus on the domestic private rented sector is welcome, it must be matched by action across other tenures and across the non-domestic building stock. Also, WMCA should recognise the need to, and value in, collaborating with other cities and regions. Many of the recommendations below can and should be done in partnership with others, which UKGBC is keen to help facilitate along with other partners. This clearly only represents a very high level summary of recommendations.

Key summary recommendations

- For the domestic sector in particular, the finance ambitions could be broader – WMCA should look to develop a suite of retrofit finance tools for all sectors, not just the 'able to pay'
- WMCA should advocate to national government that energy efficiency and heat in buildings is a national infrastructure priority (as per work done by the [Energy Efficiency as Infrastructure Group](#)).
- WMCA should set clear targets for the upgrade of all existing buildings in line with the carbon reduction targets set out for the region as a whole. There should be interim targets, and an implementation strategy on retrofit commensurate with the ambition, which also addresses issues such as fuel poverty, regeneration and climate resilience. This is also important for driving economies of scale.
- WMCA should develop a comprehensive 'householder offering' which would include a 'Pays As You Save' type programme for homes, but should also consider the use of local fiscal incentives to drive action, such as variable council tax. This should also include comprehensive communications to householders and businesses about what exactly needs to be done and by when. Similar scoping work should be done (in partnership with other cities) on the role of business rates to incentivise action in the commercial sector.
- WMCA should engage early with the local supply chain to understand training and capacity needs. Delivery should be linked to the new Trustmark standards. There is the potential to use pilot projects for training of SMEs
- WMCA should focus on the actual energy performance of retrofitted buildings. For commercial buildings, this means the roll out of mandatory operational ratings (e.g. DECs) to all buildings, and for homes, this means a requirement for ongoing monitoring/data capture post retrofit. Additional powers may be needed for this, which should be included in representations to central government.
- WMCA should support advocacy to central Government to ensure that EPCs are 'fit for purpose'.
- WMCA should work to establish metrics to better monitor and capture the 'co-benefits' of retrofit – e.g. health, jobs etc. The developing '[Build Upon2](#)' framework should be able to help with this. This is being piloted by Leeds over the coming year and the West Midlands, or constitute authorities, could also pilot by becoming a 'follower city'.

Net Zero Carbon new buildings

Introduction

We are delighted to see reference in the Plan to UKGBC's Net Zero Carbon Buildings Framework. This is a complex policy area, which is moving quite rapidly. Many cities and regions, including the West of England authorities, Greater Manchester Combined Authority and many others, are looking to bring in more stringent new build standards as quickly as is feasible. There is also movement nationally, and the outcome of the recent Part L and Future Homes Standard consultation remains unclear.

The following recommendations need to be seen in this context. UKGBC has a wealth of information related to this policy area and looks forward to working in close partnership with WMCA going forward. As per the previous section, the bullet points below represent a very high level summary only.

Key summary recommendations

We fully support the commitment in the plan for all new homes and buildings to be net zero carbon emissions in operation by 2030 at the latest. Clear guidance on interim steps en route to the target should be set out, which are adopted by local authorities into local plans – which should be as aligned as possible for consistency across the region.

- We await the outcome of the national Part L consultation, which will be all important in terms of clarifying the national minimum standard expected later in 2020. However, to date many local authorities and some combined authorities have either implemented or are seeking to implement an initial requirement of 19% uplift over Part L 2013. Crucially this should include a minimum standard of fabric energy efficiency (the details of which are set out [here](#) on page 18). One of the current concerns many have in relation to the national government consultation is the potential removal of fabric energy efficiency requirements (as opposed to overall carbon reduction requirements).
- We also lack clarity as to precisely what standard will be required under the national 'Future Homes Standard' in 2025. However, for WMCA – and indeed other cities and regions – to achieve net zero carbon in operation for both regulated and unregulated energy by 2030, then there will need to be a further crucial interim step before this date. UKGBC supports the Committee on Climate Change recommendation that new homes should deliver ultra-high levels of energy efficiency and low carbon heat as soon as possible and by 2025 at the latest, consistent with a space heat demand of 15-20 kWh/m²/yr. This level of stretch would be broadly consistent with delivering net zero carbon regulated emissions (only) – leaving the remainder of unregulated emissions to be dealt with by 2030.
- This would mean an approach based on an absolute metric, which requires central Government to signal this change. However, even without this change nationally, cities could play a crucial role as trailblazers with a commitment to adopt equivalent standards.
- The 2030 standard would therefore be achieved by stringent fabric energy efficiency requirements, and most likely some requirement to prioritise onsite renewable energy solutions, then offsite renewable energy (demonstrating additionality) followed by robust offsets through the form of an allowable solutions fund. Historically, in some local authorities this 'Merton' style policy has been used in isolation, leading to potentially perverse design consequences. However, with the stronger energy efficiency requirements and a flexible interpretation of the policy, this risk is minimised.
- Set requirements for monitoring and reporting energy performance of major new developments for a number of years of operation. The Milton Keynes policy provides a good example.
- It is also important to set requirements as soon as possible for modelling of 'whole life' carbon impacts for new developments, as the GLA have done, with a view to introducing targets and offsets in the future. This is a rapidly evolving priority within the construction and property sector. LETI have recently published best practice [guidance](#) on this.

Other policy areas

Social Value

Setting social value requirements relating to new development can support the strategic priorities of local authorities by building stronger communities, improving local environment and health outcomes and strengthening local economies. It is a potentially powerful way of better linking the environmental objectives set out in the plan, with the socio-economic benefits that WMCA rightly wish to generate for citizens. For further information go [here](#).

- Where the local authority is the landowner or client, it may set social value requirements on contracts that relate to new development through the process of procurement. These contracts can relate to developers, contractors or any other built environment service provider.
- For most development, local authorities may set social value requirements in planning mechanisms such as Section 106 or within planning conditions. These can be strengthened by setting out social value policy requirements in Local Plans, with further guidance on implementation provided in a Supplementary Planning Document.
- Local authorities may set social value requirements when selling land or transferring assets to local communities. They can also use social value measurements to calculate discounts on those transactions.
- Relevant local authority teams should work together to ensure a joined-up strategic approach for setting social value requirements in relation to new development. That approach should be set out in the local authority's Social Value Policy, which will include the approach to broader social value requirements.

Biodiversity and Climate Resilience

We welcome the inclusion of plans to take both net gain and boosting climate resilience into account through expanded natural capital investment, including expanding the initial WMCA Natural Capital Investment Plan to enable further investments in green and blue spaces. A sustainable urban drainage investment plan that prioritises nature-based solutions will be a critical investment, alongside urban greening measures to combat overheating and deliver co-benefits such as improving air quality and biodiversity.

Our recommendations are:

- National proposals for Biodiversity net gain in new development should be introduced as soon as possible, using the latest DEFRA metric (available [here](#)). This should be applied to all forms of development including major infrastructure.
- Urban greening factors, such as those in the London [Plan](#), should be developed and applied to encourage biodiversity and climate resilience in urban development. The importance of both nature-enhancing and climate resilient green infrastructure should also be mirrored in the West Midlands Design Charter and associated design guidance.
- Local planning requirements should be strengthened to place greater emphasis on climate resilience and biodiversity enhancement.
- The 'climate audit' proposed for the transport network should be broadened to encourage greater climate risk disclosure from businesses and key agencies across the region. Many organisations are now reporting their climate change risks and opportunities, following the recommendations from the G20 Financial Stability Board's Task Force for Climate-related Financial Disclosures (TCFD) and action to promote climate-risk disclosure should be encouraged.

- Beyond the proposed awareness campaign, further policy should be considered to encourage residents to maintain and 're-green' existing properties, in order to enhance biodiversity and climate resilience. This could build on similar work by the Environment Committee of the London Assembly (available [here](#)).
- Alongside the proposed sustainable urban drainage plan, a plan should be developed to address the risks associated with heatwaves and overheating. This should look to examples such as Paris' Emergency Heatwave plan, which utilises green space and infrastructure to provide cooling. Both plans should consider measures to reduce water consumption and encourage the long-term storage of excess water.
- Clear guidance should be provided so as to encourage the planting of appropriate species throughout new green infrastructure, such as those beneficial for air quality, biodiversity and climate resilience.
- The example of the [Ignition](#) project in Greater Manchester, which aims to develop funding mechanisms for green infrastructure, should be considered as a relevant model.

Circular Economy

Policy to promote a more circular economy will be crucial for addressing the region's carbon and environmental footprint. The construction sector is one of the largest producers of waste, and measures to promote more circular approaches that encourage re-use will help address concerns over embodied carbon and disposable materials.

- We support the NPPF recommendation on P.35 to integrate greater consideration of circular economy principles in planning.
- As part of developing a circular economy, local re-use hubs (sites for material and product storage) and data collection should be prioritised.
- Re-use targets should be created for new development.
- The example of the New London Plan should be emulated in terms of requiring circular economy statements with new plans. This should also include greater consideration of reuse in direct procurement practices.
- Local authorities should develop Circular Economy frameworks that set out key priorities, formalise the waste hierarchy and incorporate the Sustainable Development Goals; similar to the example of Brighton and Hove Council. Circular Economy principles should be integrated into the project brief stage.