

The following organisations have endorsed this response to Leicester's Climate Emergency Action Plan:

- Climate Action Leicester and Leicestershire
- Extinction Rebellion Leicester
- Footpaths: Routes to a green life
- Green Christian Leicester City Group
- Green Guardians Leicester: Local Muslims working to tackle climate change
- Greenlight: Creating Christ, Creation and Community
- Harborough Woodland
- Hindu Climate Action
- Leicester Campaign for Nuclear Disarmament
- Leicester Environmental Youth Board
- Leicester Friends of the Earth
- Leicester Green Party
- Leicestershire Labour for a Green New Deal
- South Highfields Neighbours
- Sustainable Harborough
- Transition Leicester
- Women's Equality Party, Leicester and Leicestershire

We have been reading Leicester City Council's Climate Emergency Action Plan. We appreciate the steps that were taken to consult widely and we recognise that this Action Plan only covers the first year of the ongoing strategy in detail. Although we found much to applaud, we also have some major concerns.

Having compared the content with our key asks during the Climate Conversation, our biggest concern is that it does not represent a true response to an emergency. Although the vision is good, the action plan does not result in substantial change.

The most essential things which we see as missing are:

- **We need a cross-council response, involving every department. This means the climate impact must be given its real value and embedded in all council decision-making.** The whole council should be committed to and understand how to act on the climate emergency. This requires:
 - Training across the board as well as specialists in every department. Within 2 years, all senior officers across the council need this training and the council should be looking for detailed specialist training for officers in each department.
 - Ensuring everyone understands they are working to a clear carbon budget.
 - Prioritisation by the City Executive, planning committee and scrutiny commissions.
- **Support cultural change in attitudes, behaviours and knowledge around what is acceptable and what should be respected or celebrated.** We need low carbon behaviours to become the social norm: sharing things like cars, tools, housing, sharing skills like how to repair, insulate, resolve conflict, having messy green gardens and old mended rather than new possessions.
 - Train people in useful skills like how to insulate a house, repair, organise at a street level.
 - Provide spaces and support for neighbourhoods to share tools, mend things and work together.
 - Put in place support systems such as acting as a broker for people wanting to take lodgers; giving low carbon advice.
 - Promote much more widely what is happening, for example, reuse shops, repair businesses and projects and car share schemes.
- **Every council strategy should be integrating measures for climate mitigation and carbon reduction.** This means the Local Plan, Local Transport Plan, Strategic Growth Plan and all other strategic plans need to be systematically reviewed to ensure they support reducing greenhouse gas emissions.
- **Additionally, other strategies need to be developed.** These include – as in some cases you acknowledge:
 - A renewable energy generation strategy to massively increase Leicester's local renewable energy supply from both in and beyond the city.
 - A climate resilient homes strategy, to externally insulate all solid wall council homes in the next 5 years and to help owners insulate their homes.
 - An education strategy to start supporting cultural change. This is sort of mentioned in 1.05 of the action plan, but barely touches the edges of what is needed.
 - A food strategy focussed on climate change.

- **Divestment from fossil fuels, not engagement.** The current plan commits to engagement with fossil fuel companies, not divestment. Given that most of the fossil fuel reserves already discovered need to remain in the ground if we are to avoid catastrophic levels of global heating, it is essential to stop funding the organisations which are still extracting.
 - Leicestershire pensions scheme has 3.7% of the investments in fossil fuels – why not divest quickly and put them into deep green retrofit instead? This would make financial sense as fossil fuel companies are not performing well and the possibility of stranded assets is becoming increasingly likely.
 - It also means ensuring the energy you buy as a council does not come from fossil fuels or companies who use them - in other words, moving to a genuinely green electricity company.

We had difficulties assessing how effective some of the actions included in the plan will be, as the level of detail was often insufficient. We would appreciate more detail, even if there is some uncertainty about what will be possible – any funding dependencies could be stated transparently.

We have specific comments on each section of the action plan.

Section 1: Actions supporting all the themes / education / accountability

Points 0.01, Carbon neutral roadmap for the city and 0.03, Climate emergency board are excellent. Many of the other points in this section are also good and we support them in principle, however, many are not specific and focussed enough for us to be able to tell how effective they would be.

Action	Concerns
1.02 and 1.04 Carbon Literacy training for decision makers, Climate implications of council and executive decisions	These need something much more specialist relating to budgets and policies. <ul style="list-style-type: none"> - climate literacy training should be rolled out to all new hires and then to all officers - carbon budgets training needed for all managers, within all departments, by end of 2022 - carbon budgeting needs to be put in place in all departments - accountability for carbon budgets needs to be added to job descriptions in all departments.
1.05 Lobby central government	That the Council systematically lobby national government for change in planning and transport laws and for more resources and money to tackle the climate crisis was on our list of key actions. This means working with other councils across the country to fund paid workers to do this effectively, i.e., building a lobbying organisation. You could work with Client Earth. This seems to be partly in place, but not systematically or funding paid workers.
1.12 Energy strategy	We are concerned that this does not prioritise renewable energy generation on a local level.

Section 2: Housing

We found this section disappointing as it did not tackle retrofitting privately owned housing, which is essential and needs to start now.

2.01 Saffron Lane – phase 2 housing development	There should be a timeline for reaching carbon negative for council housing. The current Leicester Standard, while a good first step, needs to be strengthened fast.
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2.03 Boiler replacements programme	If it is to happen at all, this should be done within all council homes needing it within first 3 years. However, it raises the question of whether instead you should be insulating and putting in air source heat-pumps and solar generation so these homes are not tied to fossil fuels for the next decade.
2.08 External wall insulation	We would like to see an aim to have all council houses insulated and with external window shades/blinds for use during heatwaves in 3 years.
2.09 Solar PV	This should include a plan for making solar available to owner occupied and private rental housing too. This can be done by providing bulk bought panels, sorting the contracts, employing reliable contractors who you manage so people can just sign up to and pay for installation (some London boroughs are doing this).
You also need	External insulation should be made available to owner occupied and private rental homes using a similar system to the one we outline for solar PV in 2.09.
2.10 Private rented housing –energy efficiency and affordable heating	This needs a stronger requirement for energy efficiency for private rented housing, which could be tied to licensing. The current argument that you do not want to push good landlords does not make sense – they are the ones most likely to improve insulation and energy efficiency if required to.
You also need	A Green Doctor type scheme to support home owners to improve their homes should be revived - to provide advice, approved suppliers, discounts through bulk buying etc.
You also need	To set up and run a brokering scheme to support people to take lodgers reducing under-occupancy.
You also need	Neighbourhood skill training for solid wall insulation, tile and window replacement, and external blind-fitting so people can help each other to cope with green retrofitting and extreme weather conditions.

Section 3: Transport

There are some excellent initiatives in this section, including 3.03 E-bike hire scheme, 3.19 Parking enforcement, 3.20 Red routes and 3.22 Workplace parking levy. However, these need to be matched by appropriate policies to discourage private car use or they will not be effective.

3.02 Cycling and walking	The cycling and walking infrastructure needs to constitute a network, with cycling routes on orbital as well as radial roads.
3.06 Bus lanes	Bus lanes must be joined up and include at least an inner and outer orbital bus lane to improve the reliability of the service.
3.07 Bus services and schedules	Improved services and schedules would be very welcome. We also need a tap and cap payment system, like the Zip card in London.
3.10 Park and ride electrification	We fully support the electrification of the buses. We would like to see this linked to solar generation.
3.15 Schools engagement and 3.17 BikeAbility	This is an example of where the measures to encourage active travel should be linked to measures to discourage private car use. When students and families have been supported to cycle and walk, 'school streets' initiatives can be implemented to further encourage them to leave the car at home.

3.21 20 mph zones	For clarity and for safety, 20 mph speed limits should be introduced across the city.
You also need	On match days, traffic to the stadiums can be extreme and create significant congestion. A solution for these journeys is needed, such as a dedicated Park and Ride on match days.
You also need	Freight is the fastest growing category of road traffic and it is not even mentioned in this action plan. The council needs to tackle this issue and start introducing freight hubs to reduce the number of delivery vehicles.

Section 4: Consumer choices

4.09 Public realm drinking water and 4.11 School meals are good and have our full support.

4.02 Organic waste	Community composting is missing – a community composting scheme like that of Brighton & Hove should be developed.
4.03 Reuse shop	This is an excellent scheme but it needs to go much further. We need a series of reuse shops that are promoted widely. We also need signposting for repair services.
4.10 Food for Life communications	While communicating this work is definitely worth doing, we would like to see you aim for the gold standard here. Please tell us what the obstacles are.
You also need	We would like to see a category on reducing waste from school milk (waste from the packaging and waste of the milk itself).

Section 5: At work

There are many good initiatives in this section. For example, 5.02 Business gateway is an excellent scheme and we would like to see a comparable service for home owners (see above). We would like to see additional actions as follows:

You also need	We would like to see a fiscal incentive for low carbon businesses to help them get established in the city.
You also need	To complement the actions above to reduce road traffic, the council needs to work with businesses in the city to tackle the issue of freight. This should include creating a number of freight hubs, with zero-emission last-mile delivery.

Section 6: Land use

We were pleased to see actions 6.03 Strategic sites, 6.30 Bee roads and all the actions related to district heating and flooding. We had comments on some of the actions listed in this section:

6.02 Sustainable construction policy	We are happy to see this included. It would be good if it also included the carbon storage capacity of building materials.
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6.03 Strategic sites	Early consideration of sustainable transport links is needed at strategic sites, as part of the work to ensure they contribute to mitigating climate change.
6.04 – 6.06 Low carbon housing schemes	These sustainable housing developments should be big and ambitious rather than just tokens.
6.24 Green infrastructure and 6.25 Biodiversity	These actions do not have detail for us to judge whether they are sufficient. They mention aiming for a net gain in biodiversity without explaining what this could mean. Nature restoration and rewilding needs to be part of the training for planners.
6.28 Climate woodland and 6.29 Tree planting	Again, we would like to see more detail about these actions with quantity targets. Tree planting should focus on fruit and nut trees to also address the provision of local food.
You also need	We would also like to see more support for food growing in the city, as these sites improve food security and act as carbon sinks. This could be linked to the allotment strategy.

Section 7: Council activities

We would like to see the following actions further developed:

7.05 Training programme for Estates and Building Services	This is excellent but it needs to be backed up with policy so that staff can act on what they have learnt in training.
7.10, 7.11 and 7.12 Capital projects and carbon tracking.	These climate considerations / guidance for capital projects have the potential to be excellent but we need more detail to understand them fully.
7.18 Business travel	Again, this could be excellent but we are not certain from the detail that is supplied.
7.22 Relaxed mowing	We would also like to see the council eliminate the use of pesticides, in line with other local authorities that have joined the Pesticide Action Network. Pesticides are dangerous to human health so they should not be used in public areas and they reduce the biodiversity in our city.
7.25 Responsible investment plan	It has been shown that pension scheme engagement with companies on climate change is not effective because the schemes do not hold enough shares to have much influence. The council should join the growing divestment movement and remove their funds from fossil fuel companies. You could invest instead in local low carbon projects, such as renewable energy generation.

Thank you for taking the time to read our concerns.