

# RBWM Environment and Climate Strategy

## Public Consultation

### Introduction

The Council have produced a [draft Environment and Climate Strategy document](#) and they want as many residents and organisations as possible to give their views as part of a public consultation.

It is good that the Council have declared an emergency and produced a strategy but there are some major flaws with the strategy.

### What we would appreciate You doing

To help you decide what to include in your consultation response we have explained the problems with the document:

- [Fundamental Problems](#)

Then there are the problems with each section:

- [Buildings and Energy](#)
- [Air Pollution](#)
- [Circular Economy](#)
- [Natural Environment](#)
- [Transport](#)

If you are short of time then we recommend that you read about the Fundamental Problems and then choose the section that particularly interests you (the above bullets are links to those sections).

Then complete the [consultation questionnaire](#) using the information we have given you.

The consultation ends on 29<sup>th</sup> September so, with the help included here, please take some of your valuable time to submit a response. In doing so you will help shape the way that RBWM addresses the major environmental and climate challenges that we face NOW.

### Who are we?

We are the RBWM Climate Emergency Coalition (CEC) ([website](#)) ([Facebook](#)) and these are the [groups who produced this document](#).

### What the CEC Achieved

In the first half of 2019, the CEC petitioned and campaigned for the Council to declare an Environment and Climate Emergency (E&CE), and to reduce the Borough's CO2 emissions to net zero by 2030. In June 2019 the Council did declare an emergency, but with a commitment to net zero by 2050, and 12 months to have its strategy approved. However, the document that was approved on 25<sup>th</sup> June 2020 was only a draft, rather than the final version, and continues to be developed.

## What are the Council consulting on?

The Council are seeking views on the strategy. In particular:

- The strategic themes and objectives.
- The approach to setting a carbon trajectory.
- The approach to prioritising actions and incorporating other actions in the next five years.

The Council are also seeking to understand what others are doing, and to increase engagement:

- What are you already doing to tackle climate change.
- How can you help us to achieve our objectives.
- How we can engage and involve more people.
- Gathering views on the most compelling benefits of taking action.

## Questions

The questions that you will be asked in completing the Consultation Questionnaire are as follows:

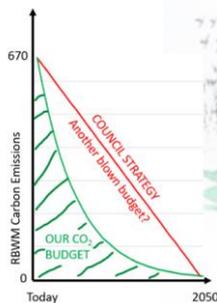
- Do you have any suggestions for improving our vision for the borough?
- The strategic framework has been based on focussing our action around four key themes. Do you agree with each of the themes and if not do you have any suggestions for improving them?
- Do you agree with the objectives of each theme and if not do you have any suggestions for improving them?
- Are there other areas you would consider a priority to tackling climate change in the borough that fall outside of these 4 themes?
- The Council has committed to reviewing the trajectory set out in the Strategy to ensure it is as ambitious as possible whilst remaining achievable. Is there a specific approach or issue you would like us to consider when devising a revised Paris-agreement aligned trajectory?
- Do you agree with the key actions for each of the themes and if not do you have any suggestions for improving them?
- Are there actions that the Royal Borough could undertake in the next five years you believe are vital to the success of the strategy that have not been included?
- Are there additional criteria you would like to suggest to help prioritise actions?
- What are you already doing to tackle climate change?
- Please tell us what you/your organisation would be willing to do to help deliver the objectives set out in the strategy?
- Do you have any suggestions as to how we can involve more local people in tackling climate change?
- What do you think will be the biggest benefit to residents of the Royal Borough in acting on climate change?
- Do you have any other comments you would like us to take into consideration?
- Please indicate if you would like to remain updated on progress or to get more involved in tackling climate change in the borough?

## Fundamental Problems

### Why does it matter?

The Council hasn't used best practice plans from other Councils nor used expertise from any of its stakeholders so there are major flaws with the document.

1. **RBWM will have used its carbon budget by 2028.** The Trajectory for RBWM reductions to net zero



is a straight line. This means that RBWM will have used all of its allocated carbon emissions by 2028. This needs to be a curve that starts very steeply downwards and gradually flattens out because it is very difficult to remove the last few percent of carbon emissions. So, we need the most reductions in the first few years.

Thus, all actions to manage the E&CE are urgent. It is a Climate Emergency! The Council has been given reports about the curve produced for free by the world-renowned Tyndall Centre, which they are ignoring.

2. **Need a massive education and engagement effort.** The council acknowledges that they 'can't do this alone' yet the education and engagement theme is missing entirely from the strategy, and 'community' is only lightly mentioned. This is a serious omission that needs to be addressed urgently. The council needs to educate, influence, inspire and support people of all ages and backgrounds to take action. This should start with all councillors and officers.
3. **Targets are not challenging or ambitious enough.** Example "Reduce transport emissions at sensitive locations: 'No idling' zones outside schools investigated by April 2021". The Council should implement a 'No Idling' policy everywhere in the borough because vehicle emissions seriously damage health. Example "Reduce residual waste: Hold 3 repair cafes for residents to attend". This should be at least double, or the first Saturday of every month.
4. **The listed Actions will not give the necessary savings and lack a sense of urgency.** Many actions are so achievable as to be amusing. This is a declared Climate Emergency, so all actions must be ambitious and be attempted if not fully achieved as soon as possible. Example: the Government funded 'Scatter Tool' provides RBWM with the ability, at no cost, to build scenarios for emission reduction. It is based on setting ambition levels for 32 elements of the boroughs carbon footprint and produce pathways or trajectories to 2050. The current RBWM 5 year pathway presented is close to the lowest level of ambition from all 32 elements.
5. **Use Local Wilds resources.** The six Wild groups of RBWM, Wildlife in Ascot, Wild Cookham, Wild About Datchet, Wild Eton & Eton Wick, Wild Maidenhead and Wild Windsor stand ready to use their local knowledge, and considerable ecological and biodiversity expertise to support RBWM to plan and deliver for the Natural Environment. Therefore, it is inappropriate for this document to be so infused with a reluctance to spend money and act to increase and support biodiversity, since considerable local resources are available at no or low cost. Local wildlife groups can conduct species and habitat surveys, submit wildlife records, write wildlife conservation management plans, run conservation work parties, set up and run groups to conduct regular conservation activities at a site.
6. **Need to raise money to spend on E&CE actions.** Many actions need money and the Council has none. They could like Nottingham City Council, talk to local Businesses about the importance of the E&CE and implement a levy for workplace parking which encourages a greater use of public

transport. These funds can be used for E&CE projects. No need to spend time reinventing the wheel, just look at best practice from other Councils.

7. **Need a fully-resourced Action Plan based on a corrected trajectory.** The strategy has many deficiencies but we urgently need a proper, fully-resourced Action Plan based on a corrected trajectory (see 1 above). The project plan with associated risk plan, needs expected benefits for each action, and must include education and engagement of all stakeholders and will need to utilise residents and businesses to undertake some of the actions.
8. **The proposed Single Use Plastic Strategy,** the first draft of which is being produced by Plastic Free Windsor, **needs to be ambitious in scale, ambition and duration.** It is well documented that part of the fossil fuel industry's coordinated response to reduced demand for fuel brought about the shift to renewable energy and electric vehicles is the expansion of plastics manufacturing. Companies including Saudi Aramco and Royal Dutch Shell are planning to spend £300bn on it.

## Buildings and Energy

### Why does it matter?

Burning fossil fuels to make electricity and heat our homes and workplaces are the biggest source of CO2 emissions in RBWM and in the UK. CO2 trapped in our atmosphere causes global warming, which causes climate change. The E&CE Strategy states "The frequency and severity of extreme weather will increase across the UK." Heatwaves like that seen in 2019 and 2020 and the winter storms like in 2015 will be increasingly more likely the more CO2 is released into our atmosphere.

1. **Need to require developers to build new, or refurbish existing, as zero-emission buildings.** The Borough Local Plan (BLP SV) is still undergoing examination and not approved. Even when it has been adopted it will increase carbon emissions by 22.5%! There is nothing either currently or in the BLP SV) to require developers (e.g. of housing) to build to an eco standard. The Council have refused the CEC's request to include immediately an SPD (Supplementary Planning Document) which they supplied with those eco standards. The Government Inspector tasked with assessing the BLP SV indicated that it is possible for the council to adopt an SPD even while the BLP SV was being reviewed.
2. **Reintroduce the CIL/Section 106 charges in Maidenhead.** Currently the Council does not impose a CIL charge on buildings constructed in Maidenhead town centre. Every other Council imposes this charge which is essential in enabling provision of new infrastructure to meet needs generated by new development. This is money the Council could easily raise through new development or refurbishment of existing buildings and ringfence an appropriate proportion of this income for E&CE projects.
3. **Reduce the number of homes required** – the Government Inspector currently assessing the Borough Local Plan has indicated that the number of new homes required is around 50% less than planned, many of these are already built. The council should consider reducing the number of new homes planned, and therefore reducing the associated embedded carbon.
4. **Make it easier to convert unused office/retail spaces and heritage assets to housing** – 'Repurpose don't build'. Historic England is among the national organisations who indicate buildings **must** be "recycled" whenever possible to reduce carbon through reuse rather than constant, environmentally costly investment in new builds. New planning regulations may be required to ensure these converted homes are of a 'good' quality and VAT on refurbishment should be reduced significantly or waived to support such reconstruction opportunities.

## Air Pollution

### Why does it matter?

[Public Health England](#) currently estimate that in the Royal Borough of Maidenhead and Windsor that 69 annual excess adult (age 25+) deaths arise from PM<sub>2.5</sub> exposure. (The main source of Particulate Matter is burning fossil fuels, particularly from petrol or diesel used in vehicles, and from the wearing down of tyres and brakes.)

All of the organs and your blood in your body are adversely affected by breathing in air pollution which leads to increased risk of asthma, strokes, heart and circulatory disease, and dementia. Children (age 0-14) are most at risk as their bodies are still developing, followed by older people and people with respiratory conditions. The [WHO \(World Health Organisation\)](#) recommends that “children’s current exposure to air pollutants be reduced, particularly in regard to traffic-related pollutants”.

[Just a small increase in long-term exposure to fine particulate matter \(PM2.5\) leads to a large increase in coronavirus death rate.](#)

1. **Need to monitor the levels of Particulate Matter.** There are no PM<sub>2.5</sub> or PM<sub>1</sub> monitoring stations at all in RBWM. There is only 1 measuring PM<sub>10</sub> in Maidenhead within their town centre. There is growing evidence that the smallest particles PM<sub>2.5</sub> and PM<sub>1</sub> are the most damaging to health.
2. **Need an air quality baseline.** There are very few monitoring stations and none in potential air pollution hot spots e.g. The Pound in Cookham, outside schools, hospitals and care homes, some major traffic junctions.
3. **Maidenhead and Windsor Town Centres and 3 other areas have illegal Nitrogen Dioxide.** Insufficient is being done to reduce the [5 areas inside RBWM in which the levels of Nitrogen Dioxide \(NO<sub>2</sub>\) are above the legal limit.](#) Those residents have been suffering for between 6 and 15 years!

## Circular Economy

### Why does it matter?

Efficiencies in the circular economy can result in significant reduction in the use of raw materials and energy for manufacture, recycling and composting. Moving to a circular economy therefore has the potential for dramatic reduction in the use of fossil fuels and the carbon emissions that are a direct result.

The Circular Economy strategic theme lacks clarity. It is an untidy and incomplete mixture of actions. Much greater emphasis needs to be put on actions that reduce waste and consumption. Sustainable food supply is an enormous subject and if it is to be addressed seriously, it needs to be a separate theme. It is out of place under Circular Economy.

1. **We need to encourage consuming less.** The strategy’s overall aim is to “Reduce waste and consumption” but there are few significant actions directed at reducing consumption, and those that have been included lack ambition and urgency. We need to educate the Borough’s residents, visitors and businesses to reduce consumption – to “Refuse, Reuse, Recycle”.
2. **The emphasis should be on reducing total waste, not residual waste.** The main focus of this theme is currently to reduce residual waste, primarily by recycling. Manufacture, recycling and industrial composting all require large amounts of energy. We need to reduce total waste and its associated energy use by reducing consumption.

3. **We can't recycle our way out of the problem.** The primary aim in this draft is to reduce residual waste by increasing household recycling rates. The aim should be to reduce total waste, including recycling. If we could recycle all of the plastic ever manufactured, we would already have more plastic than we could ever need.
4. **We all need to "Get Our House in Order".** The Council, residents, visitors, businesses and community spaces must be encouraged to identify and implement the simple changes that can be made immediately and which will significantly reduce consumption. Significantly reducing single use plastic consumption is not difficult.
5. **Covid-19 does not have to prevent us from reducing single use plastic consumption.** While acknowledging that Covid-19 brings a new set of challenges, drinks in plastic bottles and use of plastic straws and stirrers are just three examples of things that do not make us safer.
6. **Current initiatives that will reduce total waste lack ambition and need to be much bolder if they are going to have an impact** (eg increase composting by 10% should be 50%, by 2025). Actions such as support for repair cafes, refill shops, clothing swap shops, reuse shops need much more ambitious targets. A number of these actions don't currently have a completion date at all. As the Action Plan is currently drafted, these actions will have very little impact in the first five years.
7. **We need to vigorously introduce other initiatives that will reduce waste,** including but not limited to an acceleration of the Borough's Refill scheme, implementation of a Borough wide water fountain strategy, and implementation of a Borough wide Deposit Return Scheme?
8. **There is no Circular Economy baseline.** The first 5 years should be about "big ticket items" and "low hanging fruit" – the items which will give the greatest return, most quickly. Without a baseline it's not possible to know what they are.
9. **It is critical that the Borough's waste is recycled correctly.** It is absolutely critical that the council ensures that its waste contractors are recycling the Borough's waste correctly, and are not allowing it to be dumped, burnt, or disposed of in a way that has a human cost through unhealthy and dangerous conditions and practices.

## Natural Environment

### Why does it matter?

The UK is one of the most nature-depleted countries in the world. Biodiversity loss is borough-wide and rapid. This is bad for residents because biodiversity enriches our lives through a wide range of ecosystem services including clean air, clean water, carbon sequestration and flood risk reduction. Indeed, humans cannot live without biodiversity to pollinate food crops. The ecological crisis goes hand in hand with the climate emergency. It is therefore essential and urgent that RBWM acts to halt biodiversity decline and ensures that biodiversity is supported and increases.

1. **Need to tackle fundamental problems with the draft Strategy.** The draft strategy will not achieve its aim of increasing biodiversity because it lacks the scale, cohesion and timeliness required. This draft plan is not sufficient even to halt current biodiversity decline, in our opinion, before 2030. It is a starting point for understanding the nature of the challenges and tasks facing the Borough with regard to biodiversity but there is little to distinguish the items under Objectives, Action and Measure of Success. This results in a lack of any clear sense of how individual actions will deliver on the strategic objective.

2. **We must be more ambitious in our targets (page 30).** The Council targets a 10% in biodiversity net gain and limits even this gain to that obtainable through the planning system. This is totally inadequate for the task. The metrics applied by the Council need to be Borough-wide and plans put in place to engage with the broader community if we are to get close to achieving any effective improvement which will make a worthwhile contribution to achieving meaningful habitat and species enhancement.
3. **We should measure Priority Habitats and Priority Species (page 30, row 1 of table).** The overarching measures of success should be i) 20% increase in area of Priority Habitat by 2023; ii) Increase in range and abundance of Priority Species that were declining in 2020. By targeting an increase in Priority Habitats we have a far greater chance of achieving the biodiversity gains coming from such increase. These Priority Habitats are mapped and monitored by Natural England and our local Environmental Records Centre, TVERC, and so provide a sound basis for measuring borough-wide, as opposed to planning system, success.
4. **The starting point for action (Table, page 30) should be an RBWM supported borough-wide five-year rolling programme of biodiversity action plans.** Local biodiversity action plans, geared to specific local environments, are needed, as part of an overall Borough-wide plan. Lack of resources should not be used as a reason for RBWM not to take a key coordinating, supporting and leadership role in this: the six Wild groups of RBWM have the skills and knowledge to help deliver - eg conduct species and habitat surveys, submit wildlife records, write wildlife conservation management plans (based on personal expertise of members and experience of writing the Maidenhead local biodiversity action plan), run conservation work parties, set up and run groups to conduct regular conservation activities at a site. Central to such a plan should be our network of Local Wildlife Sites with a key target that all RBWM-owned Local Wildlife Sites will have active management plans (with the proportion having active management plans increasing to 80% by 2022).
5. **Make carbon capture and storage a key part of the Strategy.** The draft Strategy makes no mention of carbon capture, a key component of any climate management plan. The Natural Environment plays a massive role in this and it needs to be reflected in the Plan. Links between Priority Habitats and carbon storage and sequestration in the Borough exist ([TVERC July 2020](#)) and provide a basis for an appropriate strategy.
6. **Where's the urgency?** The timing for such key actions as training and awareness training for Council employees and partners is woefully inadequate. This needs to be accelerated so that, for instance, planning officers, a key part of any attempt to achieve biodiversity net gain through the planning process, have received appropriate training by the end of 2021 at the latest. Such speeding up seems necessary right across the draft Strategy. For instance how can it take five years from the declaration of the Emergency to implement a new roadside mowing regime. Speed up!

## Transport

### Why does it matter?

Vehicles contribute 33% of our total emissions. The E&CE Strategy states "Enable sustainable transport choices" actually we need to rapidly change to "Use sustainable transport" (cycling and walking) which will improve our health and wellbeing and reduce the environmental impact.

1. Development of a *cohesive network of safe, formally identified routes, paths and other infrastructure, including accessible, safe, secure cycle parking at key locations which connects the whole Borough. "The benefits of cycling are numerous and well documented and show that even a relatively modest shift from*

car to cycling for local journeys can potentially deliver benefits in the following areas: traffic congestion, air quality, traffic noise, health and fitness, employee absenteeism, economic growth” (CAP Para 1.1).

a) This will incorporate RBWM Cycling Action Plan 2018-28 (and successor CAPs) prioritised and/or adapted schemes and the Gov't-funded Tranches 1 and 2 permanent "Safe Space" interventions which have been formulated in a manner consistent with the following criteria:

- The routes have been identified within RBWM adopted Cycling Action Plan
- They are identified within PCT (Propensity to Cycle Tool) as having potential for good levels of demand
- They are identified as having capacity in RPT (Rapid Prioritisation Tool) (eg. Sufficient space)
- They have local support having been identified by residents or local groups

b) Segregated, uni-directional cycle lanes (on-road)/paths (off-road) will form the major emphasis in the creation of routes. Shared paths with pedestrians can be dangerous for both groups of users, and Covid-19 mitigation advice warns against two-way cycle paths.

2. An adopted RBWM road maintenance strategy ensuring safe standards for cyclists and pedestrians including road surface treatments, markings, service features eg drains and ditches, regularly managed verges and vegetation adjacent to cycle routes/paths, and any other aspects relating vulnerable road users.

3. Consistent approach to speed limits across RBWM road network, prioritising 20mph and air quality and avoiding frequent changes between 20-30-40-50 mph zones.

4. Junction designs will consistently prioritise the needs of pedestrians and cyclists over vehicles.

5. Walking and cycling will be seen as benefits of LTNs (Low Traffic Neighbourhoods)/School Streets/Cafe Culture/ "Local is Loyal"/climate mitigation with increased walking/cycling levels as a "consequence of a wider approach" rather than focusing on increasing levels of walking/cycling as an "isolated principle".

6. Commitment to "Sustainable Transport" requires a significant shift in the focus of travel towards environmentally responsive and responsible modes of travel. This means increasing the proportion of journeys made by active travel (walking and cycling) and use of public transport, and supporting the transition to lower pollution emission vehicles to reduce adverse impacts on health, biodiversity and the wider environment.

## Groups who Produced this Document

This document has been prepared by the following groups:

- The RBWM Climate Community (new group just creating its Facebook page – please search for us)
- Plastic Free Windsor ([plasticfreewindsor@gmail.com](mailto:plasticfreewindsor@gmail.com)) in collaboration with Plastic Free Maidenhead ([plasticfreem@icloud.com](mailto:plasticfreem@icloud.com)) and Filling Good ([www.fillinggood.co.uk](http://www.fillinggood.co.uk)).
- Wild Maidenhead ([www.wildmaidenhead.org.uk/](http://www.wildmaidenhead.org.uk/)) who coordinated the input of all of the Boroughs "Wild" groups - Wildlife in Ascot, Wild Cookham, Wild About Datchet, Wild Eton & Eton Wick, Wild Maidenhead and Wild Windsor.
- Windsor & Maidenhead Cycling Action Group - <https://www.facebook.com/Windsor-Maidenhead-Cycling-Action-Group-inc-Ascot-The-Sunnings-100581748359140/>

If you would like to join a local group, or would like information about environmental or climate volunteering opportunities in the Borough please contact one of the above organisations who will be happy to help.

Thank you for your support.