



## 2030 Climate Strategy: Delivering a Net Zero, Climate Ready Edinburgh

City of Edinburgh Council consultation

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Views and Comments from the Cockburn  
September 2021

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### **Summary comments**

The City of Edinburgh Council's draft [2030 Climate Strategy](#) is the latest in a long line of related vision statements, strategies, action plans and initiatives which the Council and its partners have launched over the last decade or so.

The 2030 Climate Strategy seeks to be more than a carbon reduction plan in that it also attempts to integrate aspects of climate change adaptation, sustainable economic development, issues of social equity and well-being, for example. In this it is only partially successful.

There are undoubtedly some positive aspects to the strategy, in particular, the strategy's ambition to achieve a significant carbon reduction for the city well in advance of the equivalent Scotland-wide target is ambitious.

However, a final judgement on whether the strategy will be able to deliver the necessary projects at scale and at pace to achieve a meaningful citywide carbon reduction by 2030, and accrue additional societal benefits for the city's citizen, will only be possible when the strategy's implementation plan is published at the end of 2021. This must have appropriate costings, timescale, project owners and carbon reduction metrics to enable an assessment of the achievability of net zero carbon by 2030.

### **Community engagement**

The City of Edinburgh Council has been supporting and facilitating community discussions and practical actions to address the carbon mitigation and climate adaptation for many years and this activity has undoubtedly intensified in recent years. However, it remains unclear if such activities have influenced, or even reached, most local citizens. And it is equally unclear if hard to reach groups and minority groups have engaged meaningfully in climate change initiatives across the city.

The current Covid-19 pandemic has placed restrictions on the capacity of the council to facilitate face-to-face activities during its consultation of the 2030 Climate Strategy. However, the relaxation of Covid-19 related restrictions over the summer has allowed some suitably adapted community consultations activities to take place across Scotland. This being the case, and given the importance of the 2030 Climate Strategy, more effort should have been made on the part of the council and its partners to run face-to-face consultation activities in and with Edinburgh's communities of place and communities of interest.

The role of citizens and communities going forward will be crucial. However, it remains unclear how citizens are to be given a pro-active role in the implementation of this strategy.

'Ownership' at a community level of the strategy's aims and actions will be required if they are to have value. Worldwide, there are models of excellence in terms of successful, community-based sustainable development and climate action on a citywide scale.

'Sustainable Seattle' is a particularly well-established and embedded example of good practice, which we recommend here in Edinburgh.

### **Implementation plan**

An implementation plan for the 2030 Climate Strategy is due out towards the end of this year. This requires a further consultation exercise before it is approved. This will be a further and necessary opportunity to determine if the actions being brought forward by the climate strategy are likely to achieve a significant impact by 2030.

A thorough and careful assessment of the timing, costing and funding of actions is particularly required since Edinburgh seeks to achieve carbon neutrality by 2030 rather than to align with the Scotland-wide target of 2045. This seems particularly ambitious and final approval for the strategy should be contingent on confirmation that realistic and achievable actions are in place.

Many visions, strategies and plans have been approved in Edinburgh over the last decade or so which seem similar to the 2030 Climate Strategy. There is little evidence that they have achieved anything significant in terms of climate mitigation or adaptation over and above what would have been delivered if such plans had not been in place. The impacts of the strategies actions should be assessed on an ongoing basis against prior approved milestones and performance indicators.

### **Missing Emissions**

The net zero target of the 2030 Climate Strategy is based around the concept of territorial emissions. Arguably this does not include a significant amount of additional carbon emissions which could be attributed to the city and its citizens. It would be more than helpful to understand the city's net zero target in the context of other emissions such as off-shored emissions.

Of particular interest to the Cockburn is embedded carbon and its relationship to redevelopment and new build. Given the expansion and growth expected for Edinburgh in the near term the emission of embedded carbon from the draft strategy is notable and undesirable.

### **Adaptation**

The need to adapt Edinburgh to the unavoidable impacts of a changing local climate is embedded throughout the strategy. However, consideration of this important action area appears to be entirely subservient to the strategy's headline net zero target. This is more than unfortunate since adaptation projects are among the quickest and easiest ways of achieving active community engagement and of delivering tangible and immediate benefits at a community level. It is to be hoped that the anticipated implementation plan offers more clarity in terms of adaptation-related actions.

Missing from this is the recognition that looking after what we have now is a key strategic objective and "adaptive" project. properly maintained buildings, streetscapes and green spaces prevent loss of carbon. It also provides a long-term bridge to developing sustainable options in the future. For example, it might not be possible to increase the physical capacity

of the City's run-off sewer systems in even the medium term to deal with increased cloudburst events. It is possible to increase the maintenance regime to ensure that the existing system is clear and functions to its maximum capacity.

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### **Draft Climate Change Strategy – A Cockburn View**

The Cockburn is currently considering the City of Edinburgh Council's draft Climate Change Strategy which is out for consultation until 12 September 2021. The draft strategy outlines how the council will work with citizens, communities and public, private and third sector organisations across the city to deliver a net zero, climate ready Capital by 2030.

It is now six years since the City of Edinburgh failed to achieve its previous lofty target to be the "Most Sustainable City in Northern Europe" by 2015. The current draft climate strategy is the latest in a long line of Local Agenda 21, sustainable development, climate change, carbon mitigation and climate adaptation visions, strategies and plans which the council have published over the years, since at least 1997 when the Lord Provosts Commission on Sustainable Development was established.

Most of these strategies and plans, rather like the Commission itself and the city's 2015 target, have now sunk without trace and it is debateable if they have resulted in any meaningful or beneficial change to Edinburgh which was not already likely to have happened due to ongoing changes to Edinburgh and to Scotland as a whole.

As has become the norm, the draft Climate Change Strategy [consultation website](#) offers a restricted opportunity to challenge or add to the content of this strategy. Although there are several participatory events available, bookable through the consultation website, and other events such as the [Edinburgh Climate Festival](#) which offer opportunities to learn more about 'Climate Emergency' agenda in the year the [COP26](#) comes to Scotland. Such an ambitious target, which would require fundamental changes to the way that Edinburgh's citizens live their lives, requires more direct consultation than is currently on offer.

Every citizen, every street, every community, and community of interest must be engaged in this consultation. To achieve this some form of citywide face-to-face consultation is required. Covid-safe community consultations are already taking place in Scotland and there sees no justification to the City of Edinburgh Council facilitating face-to-face consultation events with respect to this strategy that will fundamentally change the lives of every citizen if it is successful.

This plan says it will "enable, support and deliver action to meet our net zero ambition". The draft is strong on making ambitious statements, just like all of its predecessors, but poor in outlining how these ambitions are likely to be met by 2030 or offering evidence that the strategies are realistic.

Has any city achieved carbon neutrality? Put bluntly, the draft contains very few actions that seem capable of generating projects of sufficient scale and substance on the ground in the near term (basically right now) to substantially drive down the city's footprint by 2030. There is little time left to roll out significant infrastructural change across the whole city, to every home, to every business and to every community. So if large scale climate related infrastructural changes are not already underway, then there's little prospect that they can achieve much, or perhaps even start by 2030. That is a serious reality check that the draft strategy fails to address.

This seems at best to be a strategy that aims to set a shared vision for Edinburgh in 2030 and it is not a delivery plan which details the exact route for the city to 2030. Detailed delivery plans, for actions that need to roll out well in advance of 2030, are absent, there are no costs, no indicators, and no sense of whether anything that is outlined in the draft strategy is feasible at scale and at pace. Some of this essential detail, including costs projections, is to come in later documents in conjunction with the draft strategy. However, the absence of such detail at this point makes it is exceedingly difficult to assess what is being proposed in any specific way, particularly in terms of practicality and achievability. Partnership working is said to be key to achieving the aims of this strategy. But this was also a key feature of other related strategies which have failed to deliver significant changes in the past. How will partners be led to account this time?

A related point is that much of the document seems to draw on and pull together existing plans and policies in a way that is not very convincing or coherent, especially since many of these, for example the City Centre Transformation Strategy or the City Mobility Plan, do not themselves have noticeably clear actions or costings attached to them. It is also important to ensure that the draft strategy is consistent with Scottish Government and council's equalities agenda in a clear and transparent way.

There also seem to be some major omissions:

First, no detailed analysis of where current problem areas are and therefore what can be done to fix them. The concentration seems to be on buildings, transport and "investing in change", although this requires clarification and even these are not adequately dealt with.

Energy-efficient buildings: where is the recognition that, in a historic city, older buildings cannot be brought up to modern standards? Also, an acknowledgement that these buildings have long ago paid off their carbon footprint, so demolition and replacement with new structures (especially if they are concrete) is much less eco-friendly than retaining the old?

Most of the homes which will be present in the city in 2030 are already built. Edinburgh needs actions building-by-building, street-by-street to achieve energy efficient in the built environment on a scale that surpasses any of the smaller-scale building energy initiatives of recent years. Where will the necessary funding come from?

Infrastructure is mentioned but far too little emphasis is put on the very substantial steps that are required to adapt the city to mitigate for the less desirable effects of climate change. Some climate change is inevitable whatever we do – e.g., warmer wetter summers, more stormy winters – so we need to deal with adapting to a changing climate with as much a sense of urgency as carbon mitigation.

Some adaptation projects, such as tree planting, are things with which many citizens can directly engage. And it should be noted that the benefits of tree planting should be more focused on the immediate ecological improvement rather than much longer-term carbon improvements. It takes a single tree almost 25 years to save 1 tonne of CO<sub>2</sub>. With the average household emitting 5-6 tonnes of CO<sub>2</sub> per annum it will mean that at least 2 trees per resident per year will need to have been planted in 2005 to mitigate the impact by 2030.

Transport glibly talks about electric vehicles, but where is the reasoned analysis? Whole-life carbon costs for electric cars currently outweigh the savings they make. Their batteries require rare-earth elements mined mainly from China or other far-flung sources. Perhaps electric vehicles reduce pollution within the city, but where is the 250% increase in electric generating capacity we will need to come from? Has anyone demonstrated a practical system for recharging in dense tenement areas?

Reducing the overall amount of car use would make more sense, but CEC has not demonstrated an ability to do this in the past or shown that it requires and enforces Green Travel plans for major developments.

Active travel is mentioned but seems largely cycling focused with no follow through in creating a truly safe and effective cycling network in the city. For many, the cost of electric vehicles is simply unaffordable.

While the strategy identifies transport/ buildings emissions as a key focus at local level, and these are certainly major areas where progress will be needed. The idea that consumers and citizens will be willing to readily accept the very significant changes in terms of behaviour and life-style needed over the next decade does not seem credible - for example by implementing fundamental change in housing insulation and domestic heating systems, likely at high cost, and a radical reduction in car ownership and use.

Radical change in the provision and effectiveness of public transport and wide use of electric (and potentially autonomous) vehicles would be needed. There is no sense of either a vision or plans for these developments.

Housing is addressed in Action 8 "Develop a plan for retrofitting social housing across the city" has an "Indicative Delivery Timeframe" of 2028-2030. But why wait until 2028 for this to start and indeed it would seem essential to start straight away on this. As this would cover only c 15% of the total housing stock in the city it would appear essential to include both private rented and owner-occupied housing tenures in the action so all housing in the city is included in a coherent plan, given that this sector contributes so much (c 29%) of all current carbon emissions and such an initiative would have many associated co-benefits over and above carbon mitigation.

A further action on housing could be to support Actions 8, 9, and 10 by developing a comprehensive database of housing by archetype and plan for retrofit measures appropriate to each in order to achieve the highest energy standard. This would also inform the cost and funding arrangements needed to support such action. Who will pay for it - public grant/loan, consumer, owner, manufacturer?

The statement that 100,000 homes in the City will need retrofitting in order to meet the required EPC level C rating by 2035 also need to be verified as accurate. And while clear that the EnerPHit retrofit standard is appropriate for social housing - so if good and proper for social housing why not ALL housing in the city. And costing this will be a significant task and then devising the appropriate funding arrangements for that according to tenure and house archetype.

Some proposals need other things in place first. For instance, "ensuring that 20-minute neighbourhoods support net-zero actions" requires that 20-minute neighbourhoods have already been set up and are working satisfactorily – something again which has been talked about but not so far delivered.

Other proposals are very vague, e.g. developing "net zero projects to support grassroots action on climate change" – what does this mean? Especially in a modern urban context. Reduce-Reuse-Recycle sustainability should be a major immediate link, but Edinburgh's chaotic waste collection service is not fit for purpose.

There is no mention of Edinburgh adopting a "Smart City" philosophy, even though many world cities have been doing this for 10 years or more – basically, using IT / data to make activities, from energy use to bin collections, more efficient and therefore reducing the carbon footprint over many areas.

Funding is going to be a major factor but there is little discussion of from where it is going to come. Any serious strategy to tackle climate change will require investment and resources on a substantial scale in the city, both by the City of Edinburgh Council and by other public bodies, and the private sector. There is no indication of what such a programme might look like and how it might be funded.

Without a clear commitment to funding the strategy is just so much hot air. Will look forward to seeing the required detail at the end of the year and clarification of how the resources required to facilitate Edinburgh's transition to zero carbon, in terms of finance and money, sit within the wider context of funding and facilitation Scotland zero carbon journey.

A fundamental question is what constitutes Edinburgh's Carbon footprint? How has this been calculated? Is it measured? Is it estimated? What is 'in' the footprint and what has been excluded. This last point needs to be explored. The calculation of the Edinburgh's footprint only takes regard of 'territorial emissions. This is a common approach which conveniently means that many emission sources that currently contribute significantly to Edinburgh's carbon output can be effectively ignored or pushed onto some other city or community to deal with, or not.

Emissions relating to food production and consumption, goods produced abroad but used here in Edinburgh, tourism, air travel and air freight are a few examples of emission sources that on a pre-Covid scale are a major greenhouse gas contributor, as is the construction industry. They do not seem to be discussed in the strategy in any detail. They are all someone else's responsibility. Edinburgh needs to 'own' these emissions. Unless it does, carbon neutrality by 2030 is meaningless, at best, or disingenuous nonsense, at worst. This document needs to be read alongside another publication produced by the Council last year, the "[Net Zero Carbon Roadmap of Edinburgh](#)" but even there the answers to these emission-related questions are ambiguous or absent

In addition, the city can only really achieve "Net Zero" if there are supporting policies and investment at Scottish and UK level, for example on transport, energy, and housing. As things stand, the City's target does not appear consistent with the overall Scottish Government target of achieving "Net Zero" by 2045. What is the rationale for setting a significantly earlier date and does this make sense? It means that the City's target cannot really be in harmony with the wider policy and financial framework.

It is disheartening to see references to offsetting. This remains a high contentious subject and it has been for years. The case for offsetting surely remains 'not proven'. It works in theory but has so often failed in practice. An area which requires the input of an appropriate practitioner as it is not well justified in the draft strategy. There are number of offsetting strategies and not all are equal, for example carbon avoidance and carbon sequestration are both offsetting techniques but with very different results).

The importance of strong Leadership is stressed, and this a definite must, even though it does not exist at present. It depends on a strong figurehead to drive the 'Climate Emergency' agenda. Edinburgh is not the same as the rest of Scotland in terms of economic activity, tourist generation, health, culture etc and deserves to be a special case decided on by its own citizens. We should be setting an example, not lagging.

The engagement of citizens in the need for fundamental change in behaviours and lifestyle will be essential. It is doubtful if this can be achieved by local politicians. It will require a major national effort. The experience of Covid has shown that people will respond and accept significant life changes if there is an emergency and a clear case for them. There is

potential that climate change will come to be seen as a similar emergency, but it is likely to require strong action and imaginative leadership by politicians not just at local level.

Overall, then, a disappointing document, which is a pity because there is a genuine appetite among Edinburgh citizens to be part of the city's climate change measures and there have been many successful, smaller-scale climate mitigation and adaptation initiatives and projects across the city.

There have been many climate change conferences and agreements (1987 Montreal Protocol; 1994 UN Framework Convention; 1997 Kyoto Protocol; 2009 Copenhagen Accord; 2015 Paris Agreement etc), any many local initiatives, so the concept is hardly new, and this initial ideas / starter document should have been produced at least 15-20 years ago. What we need now is definitive action, not vague aspirations.

END

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