



## **Submission to the Sustainable Development Commission – Response to request for input on Low Carbon Regions report**

### **Introduction**

Cynnal Cymru-Sustain Wales is an independent, not-for-profit organisation that promotes sustainable development (SD) and provides practical information to help people in Wales live sustainably. We work with a wide range of people and organisations across a broad range of issues – from climate change to economy and from fair trade to health. Our work focuses on three key areas:

- Promoting Action and Debate
- Changing Behaviour
- Influencing Government

We welcome the opportunity provided by the Sustainable Development Commission (SDC) to feed into this work on Low Carbon Regions (LCR). The response provided below does not aim to present a definitive Cynnal Cymru-Sustain Wales position on LCRs, but instead seeks to synthesise comments and suggestions that have been contributed by:

- Cynnal Cymru-Sustain Wales board members and staff;
- Our Transformation Nation partners (specifically WWF Cymru and RSPB Cymru);
- Cynnal Cymru-Sustain Wales' Members.

The two questions posed by the SDC were:

- **When can a region call itself a Low Carbon Region?**
- **When can a region say that it is on track to become a Low Carbon Region?**

In seeking to address these two questions, we have considered:

1. Cynnal Cymru-Sustain Wales' response to the Wales Spatial Plan (WSP) consultation in 2008;
2. How the definition should relate to the UK and Wales targets;
3. The powers and influence of the WSP regions;
4. Approaches to a carbon reduction strategy and carbon-impact appraisal;
5. The importance of public engagement;
6. Issues requiring clarification;
7. Useful low carbon case studies.

## 1. Cynnal Cymru-Sustain Wales' response to the Wales Spatial Plan consultation

In April last year, Cynnal Cymru-Sustain Wales responded to the Welsh Assembly Government's consultation on **People, Places, Futures - Wales Spatial Plan 2008 Update**. The response drew on a series of workshops with Cynnal Cymru members, as well as evidence gathered during the research for our 'Transformation Nation' report. It called for the WSP to 'reflect the challenges of sustainable development, and to progress our understanding and delivery of sustainable development through spatial planning and partnerships'.

This response included the following recommendations / observations, which we believe may be useful to the SDC in defining Low Carbon Regions (LCRs):

- 'the Area approaches need to better reflect and quantify how they are going to help in achieving a low carbon Wales...addressing the detail of: climate proofing existing housing stock, micro-generation in the community, and demand management in transport etc';
- greater emphasis and analysis is needed on the likely 'constraints to "business as usual" approaches to development' such as peak oil, food security and population in a world where climate change will affect patterns of growth and economic development;
- a mechanism and skills base is needed to 'challenge existing unsustainable approaches within partnership fora, and understand the consequences of business as usual approaches', and to aid the serious consideration of alternative approaches that will progress SD;
- the WSP should provide a framework for 'long-term Scenario Planning' and back-casting (e.g. from 80% carbon emissions by 2050);
- 'one of the aims of the Areas should be the provision of the infrastructure to enable people to change their current unsustainable behaviours and live more sustainable lifestyles' infrastructure';
- An analysis 'of economic costs and benefits of climate change is needed at the national level and the implications of this considered at the area level, in terms of approaches to economic development, land value, flood risk management, water resources, insurance and provision of services etc. Scenario planning and research is required, to increase understanding for appropriate responses and increasing resilience of the local economy and communities';

## 2. Relation to existing UK and Wales carbon reduction targets

One view is that, for consistency, a LCR should be one that has achieved CO<sub>2</sub> reductions consistent with the UK targets set out in the Climate Change Act – i.e. of reducing CO<sub>2</sub> emissions by at least 80% by 2050 and by 26% by 2020 against a 1990 baseline.

Another opinion, however, is that a region can only say it is on track to becoming a LCR when it has developed a “rigorous, peer-reviewed plan that shows a clear and deliverable pathway to 450ppm CO2 within 5000 days. Nothing less should count”.

The One Wales 3% per annum target is seen by some as a political target that is already very conservative, and is already a good example of how quickly policy can become outstripped by the science - and of the problem we now have of moving beyond this. Similarly, certain scientists would now suggest that the developed world needs to cut its emissions by 40% by 2020, whilst the Climate Change Act would say considerably less (26%). So although Government legislation could provide a framework for the definition of LCRs, there is concern that using these targets to set the direction of travel for LCRs would perhaps restrict what could be one of the key strengths of their scale, i.e. the ability of going further, faster.

As a result of this, there are concerns about rigidly defining LCRs now, when we know how fast the climate change science is changing is moving. What is considered ‘low carbon’ now will not necessarily be regarded as such in the future. Not only would any definition would need to be tightly linked to what the science is telling us, it would also need to be fluid enough to be quickly adapted to any new science. Therefore, whatever targets are used, the LCRs need a commitment to review this regularly. They cannot get locked into a definition that within 5 years is out of date, and locks the region into a mode of practice which exacerbates the problem instead of solving it. In addition to this, the emissions from both production and consumption should be included in these measurements.

### **3. Powers and influence of the Regions to achieve carbon reductions**

As WSP regions are not rigorously defined in terms of governance, clarification is needed as to how the LCRs would be administered. Clarification is also needed as to the processes that WSP Areas can use in order to ‘make things happen’.

Regions will need to engage beyond their direct control, using their spheres of influence to effect the change they need to reach their own goals. In order to tackle this massive global agenda, we need to start working collaboratively up and down the chain. The Local Authority areas already have emission reduction targets, as well as many businesses, and presumably there will be a need to address the overlaps between these and the LCRs.

There is concern that creating the option of 'carbon ready' may create a culture of “its out of my control so I cannot do anything”. Furthermore, it is felt that there is much that regions could do with their existing spheres of influence, without needing to wait for the UK or EU to act - such as: micro-generation, local food, buildings, planning, protecting local eco-system services, and up-skilling their workforce in the areas of green jobs.

There is concern about the possibility of allowing a region to call itself a LCR or 'low carbon ready' when it has implemented all of the cost effective emission reduction measures which it has influence over. It is felt that a region should only have LCR status when it has actually achieved the agreed emission reduction target. However, it is recognised that, given the need to re-evaluate low carbon targets, there might never be a clear 'end game' and therefore regions might never attain the goal. This may not be desirable - as it is not an incentive for action. Therefore, the definition should perhaps focus on how you define a region that is on a low carbon pathway, which is flexible enough to set milestones in accordance with current scientific evidence.

#### **4. Carbon reduction strategy and carbon-impact appraisal**

It has been suggested that the effective carbon reduction strategy should:

- Identify activities over which WSP Area has ability to influence
- Perform an analysis of the region's footprint: calculation of baseline and identification of highest CO2 sources / energy users within the Region;
- Set objectives, targets and milestones (in line with and responsive to the science) of reduction across all the sectors (including emissions from power production, public sector buildings, housing and offices, transport and waste);
- Identify and promote of what is already happening within the Region in terms of good practice to lower carbon emissions e.g. map of microgeneration installations, carbon storage...;
- Form supply chain partnerships for transformation in key sectors, and identify how organisations (public and private) will put in place policies and practices to achieve carbon emission reductions consistent with the regional plan;
- Use public sector expenditure to foster business innovation and low impact infrastructure;
- Assess all programmes for their contribution to the targets and remove barriers for individuals.

The above would require the re-jigging of priorities, and embedding the low carbon society as the ultimate goal for the region. To ensure this, it is felt that the strategy needs to be peer-reviewed by energy experts (e.g. CAT, SDC), otherwise regions will want the title LCR for the brand/kudos, without really fundamentally changing their development patterns. In the interest of filtering out more carbon-intensive activities, there would be a role for a carbon-impact appraisal tool for all new policies, projects, programmes and services to be assessed. It is possible that REAP could be adapted to do this.

In addition to the above, there will need to be a process by which implementation can be monitored and reported upon. A structured assessment (self-assessment or by an external assessor) would be necessary to prove this, that would allow a clear indication of where a region was in the Low Carbon journey, both in terms of planning but also in deployment and achievement.

All of the above would need to be transparent and consistent across all sectors. The evidence base required to calculate and track emissions is likely to be complex, and an area for experts to compile.

## **5. The importance of public engagement**

It is felt that behaviour change will play a crucial role in regions achieving carbon emission reductions. It must be obvious for the public and communities that they are living in a LCR, and there would need to be an engagement campaign to involve them in this work. This could be something that Cynnal Cymru-Sustain Wales could help with / support, given our objective of helping people in Wales live more sustainably. 'One Planet Living' is also seen as offering a suitable model, as its strength lies in offering a simple, 'consumer-friendly' sustainable lifestyle solution.

It is suggested that early activities / implementation would need to be well promoted or highly visual, so that people going about their daily business are aware that they are living in a LCR. The carbon reduction strategy must prioritise providing the infrastructure necessary to help people to live low carbon lives. Linked to this, is the question of whether people identify with the WSP region within which they live – or whether they are even aware that the WSP regions exist.

## **6. Issues requiring further clarification**

### **Links with other policy documents**

The work on LCRs offers opportunities to implement and deliver a number of policy commitments at a local level through the WSP framework. These include the commitments set out in the Climate Change Strategy, Sustainable Development (SD) Scheme, Green Jobs Strategy, Renewable Energy Routemap, Micro-generation Action Plan.

#### **1) The new Sustainable Development Scheme and Vision**

When responding to the WSP consultation, Cynnal Cymru-Sustain Wales expressed a concern about the WSP not having a vision for a sustainable Wales to ground it – because of the consultation preceding the SD Scheme review. With the publication of the new SD Scheme, SD will become the central organising principle of WAG and the public sector. In line with this, the WSP Areas should also have SD as their central organising principle, and the LCRs should be defined from a SD perspective. The objective should not be limited to reducing carbon emissions at potential cost of other factors, rather this should be achieved in way that embodies the 5 principles in 'One Future Different Paths'.

Furthermore, Action 4 in the SDS consultation document stated that the definition of LCRs will be part of the strategy to reduce each WSP Area's ecological footprint, set out in the Area's delivery framework. More information about how this will fit together would be welcomed.

## 2) The Climate Change Strategy for Wales (parts 1 and 2)

It has been argued that the LCR definition cannot be developed independently of the work of the Climate Change Commission for Wales. Indeed, the 2<sup>nd</sup> Climate Change Strategy document should provide crucial information for the LCRs, in terms of sectoral dis-aggregation of carbon emissions. Timing is an issue here as the LCR report is due out in July, whilst Part 2 of the Climate Change Strategy consultation is due out in June.

It has been suggested that rather than seeking to define LCRs in addition to the work of the Climate Change Commission, WSP Areas should simply focus on the process and delivery of the Climate Change Strategy – in order to support national goals and avoid duplication of work.

However this is resolved, it is felt that the WSP Areas should be required to update their Vision so that it is concomitant with the Vision in the Climate Change Strategy. It would be an interesting exercise for SDC to assess all the existing WSP Area Visions against the Climate Change Strategy Vision, and identify the gaps / differences.

## 3) Green Jobs Strategy

LCRs should play a role in ensuring that businesses and social enterprises aiming to support the LCR (via their products / services), are prioritised in terms of support and guidance. The skills required within the region in order for it to achieve the Low Carbon status should be identified, and programmes put in place to ensure that these are developed.

### **Broadening the definition?**

The question has also been raised as to whether it would not be better to reframe the question as what is a 'low-resource use region'? The reasoning for this being that there is a need to capture the first principle of sustainable development – 'Living within environmental limits' (as set out in '*Securing the future – delivering UK sustainable development strategy*': DEFRA, 2005). This wider view is proposed because the WSP is the principal tool for implementing sustainable development, and an over emphasis on reducing carbon emissions might lead to losing sight of the broader objective. This is not to diminish the importance of carbon and its place in climate change, but to address the concern that an emphasis on carbon reduction might cause us to lose focus on the wider SD issues.

Alternatively, as suggested above, the LCRs must be defined from a SD perspective, and presented as a vehicle towards SD. An example of how this could be achieved would be to include embodied energy in lifecycle analysis, so that low resource use does tie in with carbon emissions.

## 7. Case studies

### Regional Initiatives

- [Yorkshire Forward](#)
- [Low Carbon South West](#)
- [Advantage West Midlands](#): pioneered the UK's first LCR economic strategy, based on the following definition, *"In the West Midlands a low-carbon economy means an economy that will underpin a prosperous and thriving region through capturing the economic benefits of increasing efficiency whilst reducing direct carbon emissions and using the region's strengths in engineering, science and technology to deliver low-carbon solutions to national and international markets."*

A version for a Wales LCR economic strategy could go along similar lines, but the crucial idea is that efficiency as well as reducing emissions can go hand in hand. It is also worth noting that the West Midlands used the Index of Sustainable Economic Welfare as a headline indicator in their work.

### Model and assessment tools

- [European Model for Business Excellence](#)

### Examples of Low Carbon Initiatives across Wales (as featured on Cynnal Cymru-Sustain Wales' online directory

- [Renewable Installation Map of Pembrokeshire](#)
- [Awel Aman Tawe](#)
- [Bro Dyfi Community Renewables](#)
- [TYF Eco Hotel](#)
- [Co-options Ltd](#)
- [CRAFT](#)
- [Filsol Ltd](#)
- [Land for People](#)
- [LlaniSolar Ltd](#)
- [Sundance Renewables](#)
- [WI Carbon Challenge](#)