

**Appendix - Consultation on
Hillingdon Draft Climate Action Plan
2025 to 2028**

**Comments from
Hillingdon Friends of the Earth**

January 2025

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Hillingdon Friends of the Earth – who are we?

Hillingdon Friends of the Earth (HFoE) has been a local group affiliated to Friends of the Earth (FoE) for more than 35 years. Following an initiative from central FoE, HFoE set up a Climate Action Group in January 2020 with over 60 people attending the first meeting. Subsequently FoE consolidated the original local groups, and the climate action groups into “local action groups”, leaving Hillingdon FoE with an enhanced brief but a continued focus on local climate action.

FoE make resources available¹ to help those groups lobby and work with their local councils. Those resources include research undertaken by FoE alone, or in partnership with organisations such as Ashden². Some research is specific to each local authority so relevant figures specific to Hillingdon are easy to find³.

To better understand and inform ourselves about issues relevant to the climate emergency, we set up a number of sub-groups looking at specific issues, including energy, waste, trees & land use, transport and buildings & homes. This response to the consultation on the Hillingdon Draft Climate Action Plan 2025 to 2028 has been informed by this material and these activities, and so involves contributions and insights from several people.

We were pleased that Hillingdon Council declared a climate emergency in January 2020, and then adopted its Strategic Climate Action Plan in July 2021. At that time the Council had a dedicated climate change resource, David Haygarth, Climate Action Manager. That first version of the Plan incorporated much of our feedback and is a strong document. When the Climate Action Manager’s role was ended the Borough experienced a long period when progress on meeting the actions and objectives in the Plan seemed minimal. Our group had little dialogue with the Council despite many offers to meet and assist with implementing the Plan. This made the publishing of the plan feel like just a paper exercise. More recently Ian Thynne (Head of Environmental Specialists - Hillingdon Council) has been meeting with us to hear feedback on Council climate progress and hear our offers of assistance. We hope the meetings have not commenced merely to tick boxes owing to the imminent review of the Plan.

We would like to think that there will be processes under which we can continue to make suggestions as more detailed plans are developed, and that the same engagement will be possible for all parts of the community. We continue to hope that the knowledge we can draw on from the wider FoE organisation, and the partners they work with, is recognised as something that might be helpful, so that those developing future plans do not hesitate to contact us for comments, insights and so on when appropriate.

Please also see Appendix 1: Friends of the Earth Local Action Group Charter extract.

¹ See for example [Get your Council to adopt a Climate Action Plan](#)

² See [Affordability, co-benefits and carbon saving: the top Climate Actions for councils](#)

³ See [“How climate friendly is your area?”](#) – entering a Hillingdon Borough postcode gives information for the Borough

Hillingdon Friends of the Earth general comments on consultation document

We stated the points below in our response to the first Strategic Climate Action Plan in 2021, and need to reiterate them now:

Some of the commitments in the draft Climate Plan are to deliver a net zero or carbon neutral outcome. Whilst it is reasonable to have this as a goal to achieve, it should not be the final goal. The ambition should be to work towards as near zero carbon emissions as possible rather than only net zero. Net zero could still hide significant carbon emissions because it relies on being able to deliver good results on carbon offsetting. A continued reduction of emissions towards zero must always be the aim, given the problems we have indicated in our comments, on Theme C7 in particular, of too much reliance on offsetting.

- Addressing the nature emergency, as well as the climate emergency, is essential.
- Actions should also help to deliver sustainable development.
- The ambition should be to work towards greenhouse gas emissions as near zero as possible, with targets for the whole Borough, not just the Council.
- Action is needed because of the impact of climate change everywhere in the world, not just because of the impact in Hillingdon.
- Full and effective engagement with all parts of the community, including vulnerable people, particularly people with Protected Characteristics as defined by the Equality Act 2010, must underpin how actions are developed.
- The lead Council officer must have access to the resources needed to ensure all Council decisions take account of the climate and nature emergencies.

Brunel University of London is one of the three largest employers in the borough. The Council should show a bottom-up level of support for effecting a shift in Brunel's market positioning to be an eco-university. The changes to immigration law which mean postgraduate students cannot bring family to the UK has led to a loss of income for Brunel. This leads to job losses. This leads to less money in the local community. This leads to increased political pressure for lower Council Tax. This means Hillingdon Council has less money to spend on climate action. Brunel could focus on making its local offer to Hillingdon residents more appealing. For example, by buying two pages of advertising space in Hillingdon People. This has Borough-wide reach and could encourage Hillingdon residents to consider Brunel as a way of getting local solutions to the climate crisis.

The document should be improved by having numbered paragraphs. This will allow references to the document for questions in Hillingdon Full Council meetings and enable discussion as people can easily locate what is being discussed.

Accessibility to the Plan should be improved by editing it using the [Plain Language Commission's free download section](#) 15 tips, in particular Point 6.

The Planning Department should actively engage in a training and education programme about what the Borough will be like with 2 degrees warming. The use of the physical space in Hillingdon will need to change depending on how far past the Paris commitments the planet gets. This means that planning decisions need to recognise that groups with different protected characteristics under the Equality Act 2010 might be adversely affected, and disproportionately so. The removal of green spaces in the Borough for property development could have an adverse impact on resident's mental and physical health.

Comments by section of consultation document

Foreword

The foreword is appropriately strong, we agree with the bold statement that “*Further action remains essential. The impacts of climate change continue to become more apparent.*”

We applaud the Council for:

- keeping the broad aims and objectives unchanged.
- maintaining the promise to be carbon neutral by 2030.

Preface

We are very pleased that the Council is:

- continuing to embed climate action across your services.
- still committed to leveraging all available grant funding to mitigate and adapt to climate change.
- committed to keeping the plan under review.

Although it is stated that the Council is not markedly altering the approaches adopted in the 2021 Plan, we feel there are some areas where the strength of the language has been markedly toned down, targets lowered, and actions dropped.

“*In July 2024 the Council adopted its Strategic Climate Action Plan*” needs correcting to 2021 and there is a typo in last paragraph: “*subject to*”.

1. The Need for Continued Action

The wording needs to be amended to better reflect the urgency of tackling our current climate breakdown “*concentrations of greenhouse gases in the atmosphere are rising* [insert “significantly”] and [insert “rapidly”] *making the natural greenhouse effect more pronounced*”.

“*The changing climate has significant* [insert “negative”] *repercussions that are experienced by all our communities.*”

Change wording to emphasise that climate change is already uncontrolled:

“*Uncontrolled climate change* [replace “will lead” with “is already leading”] *to higher global temperatures...*”

Change wording to emphasise that climate change is already killing people:

“*Vulnerable populations, including those with pre-existing conditions, the elderly, and underprivileged communities, are* [replace “likely to be” with “already the”] *worst affected.* [Add “People are already dying owing to climate change. Between 2030 and 2050, climate change is expected to cause approximately 250,000 additional deaths per year.⁴”

Under “*Here are some of the key impacts identified by the UK Health Security Agency:*” the two impacts below are listed at <https://ukhsa.blog.gov.uk/2023/12/11/11-things-to-know-about-the-health-effects-of-climate-change-report/> but have been omitted from the Plan. They should be included:

“**Vector-borne diseases**

“*A warming climate could expand the range and survival of disease-carrying ticks and mosquitoes in the UK. This raises the risk of diseases like Lyme disease, tick-borne encephalitis; and potentially even dengue, chikungunya, and Zika if non-native mosquito species establish themselves. Modelling suggests that London is currently suitable for the survival of these non-native species due to temperature levels.*

“*Increased biting from mosquitoes coupled with warming temperatures could also lead to outbreaks of diseases like West Nile virus in the future.*

“**Wildfires**

“*Climate projections indicate an increased risk of larger, more severe wildfires due to hotter and drier summers. If global temperatures increase by 2°C, the Met Office projects a doubling of days with a high risk of fires in the UK, with the wildfire season potentially extending into late summer and autumn.*”

Local examples of the impacts of climate change should be included:

1. The UK experienced five heatwave periods during the summer of 2022 with record-breaking temperatures of over 40°C in England. This was not an anomaly, but part of a warming trend: extreme heat events are projected to become more likely as the climate continues to change⁵. Hillingdon residents were impacted by the heat and poor air quality owing to wildfires at Philpots Farm Open Space and in neighbouring counties.
2. On 23 September 2024, there were floods in the Borough “*The frequency of such weather events is expected to increase with changing climates which is why we’ve been taking steps to try and minimise risk to households in the borough including the adoption of a flood risk management plan.*”⁶

⁴ [World Health Organisation Climate Change Fact Sheet](#)

⁵ [The London School of Economics: Turning up the heat: learning from the summer 2022 heatwaves in England to inform UK policy on extreme heat.](#)

⁶ [Council rises to challenge following flash flood crisis](#)

3. Water pollution is increasing in the Borough's rivers because the combined sewerage and rainfall systems can't cope with increased rainfall owing to climate warming⁷ (warmer air holds more water vapour, which then falls as rain).

The source of the circular diagram on page 9 must be stated. The diagram must be clearer as it raises a number of questions. Greenhouse gases, however generated, are the cause of climate change. There is no mention here of fossil fuels which are the main source of their generation, that must be mentioned. We have never seen "aerosol emissions" quoted as a driver: Our understanding is that aerosols release greenhouse gases other than CO₂ in relatively small quantities, in no way comparable with CO₂ or even methane. Again, surely land use change can release greenhouse gases (so already covered) but otherwise has impacts such as poor soils, which are not a direct result of climate change. However, that impact does not appear in the middle circle.

Under "Poor outdoor air quality" take the opportunity to state that the Council is against the use of wood burners and bonfires because they unnecessarily cause climate heating owing to inefficiencies in generating heat and disposing of waste, but also dramatically worsen outdoor air quality. Car journeys should be carefully considered and alternative healthier options such as walking or cycling used whenever possible. The council has a responsibility for providing safe and convenient options for those who would like to walk and cycle more. Every litre of petrol consumed by a car causes 2.3 kg of carbon emissions. 6000 miles a year in a highly efficient petrol car (60 mpg) would require 450 litres of petrol, and would generate a ton of CO₂ emissions. Older, less fuel-efficient cars would be considerably higher. The council has a role in encouraging take up of electric vehicles for those who still wish to drive.

⁷ [Preparing for the future – Ofwat's climate change policy statement](#)

2. Our Vision

We congratulate the Council on keeping its vision “*To become the greenest London borough*”, but there are no measures comparing how the Council is performing compared to other boroughs. The Council must reconcile its performance using [Climate Emergency UK's Council Climate Action Score Cards](#) in a comparison with other London Boroughs. We would like a League Table to be published along with the Plan Update each year, which sets out the Borough's ranking.

We also believe that Hillingdon Council needs to be crystal-clear in what it means by “the **greenest** London borough” To quote from the Council website, Friday 21 July, 2023: “*Hillingdon Council has retained its status as one of the greenest boroughs in the country after receiving 67 Green Flag Awards - the most held by any local authority.*” This is praiseworthy, but it interprets “greenest” as “having the most green flags”, or at a stretch, “the most green space” (although even there, the two are not the same). This is not the same as being the most eco-friendly, or the most energy-efficient borough, or the borough with the best route to net zero.

Correct the typo where theme C9 has been renamed “*Transparency*” when it was originally “*Transparency, Communication and Reporting*”.

Under “Our Carbon Neutral Target”, for items iii and iv, the abbreviation “i.e.” (“that is”) should be replaced by “e.g.” (“for example”), because in both cases you are giving examples.

3. Our Progress

We congratulate the Council on reducing its carbon footprint by 54% since 2020.

We feel the financial climate was only one reason the Council has not been able to deliver on all its aspirations. There have also been missed low-cost good value opportunities to work with the community and lead residents towards progress, so the wording should be changed:

"The challenging financial climate [replace "means" with "is one of the reasons"] we have not been able to deliver on all our aspirations and we have focussed on delivering tangible outcomes that we have direct control over. [insert "We have also missed low-cost good value opportunities to work with the community and lead residents towards progress]."

To accurately and transparently measure progress, all the Actions from 2021 should be listed and the progress stated for each. This should be peer-reviewed or independently verified.

Theme C1: Community Leadership

Considering in 2021 it was stated that "*Community leadership is the overarching commitment in this plan*" there has been a stark lack of progress. This is particularly disappointing when a lot could have been achieved with little financial outlay or effort, and the use of the community could have led to low-cost dramatic progress towards meeting objectives in the Plan.

"The focus has been on getting the Council's 'own house in order' which means further development of the work on community leadership is required" has no reference to the decarbonisation of private sector homes. The decarbonisation of private sector homes has so far largely been ignored; this must be rectified.

Please amend "*Work has been undertaken with the Friends of the Earth...*" to "*In 2024 the Council started meeting with Hillingdon Friends of the Earth...*".

"Work is necessary to determine whether the current cost of offsetting 1tCO2 (i.e. £95) from new development is sufficient" needs to be more specific, and more contextual information is required, including the source of the £95.

The commentary states "further development of the work on community leadership is required" but progress has been classed as **Moderate - Progress has been made against a small number of the actions**. But of the objectives set in 2021 (listed below), only C1.4 has been progressed resulting in a tangible output. So, Community Leadership should be classed as **Further development required**, to match the commentary and lack of progress. Or progress that we are not aware of should be stated.

Theme C2: The Council's Own Operations

We congratulate the Council on good work on these objectives. Residents are aware of the substantial progress against C2.5 for buildings like sports centres and the Civic Centre, and C2.7 for street lighting. However, simply stating "*The progress against this objective is very positive*" with no justification or detail relating to the objectives set below contradicts the theme of "*Transparency, Communication and Reporting*". There is no detail presented to demonstrate that 2030 targets are likely to be met. Please state what progress has been made against each objective and explain why future dates are realistic.

Theme C3: Building Better Places

Again, we congratulate the Council for positive progress. It is good that the Council implements the policies of the London Plan and is securing Section 106 funds. However, these funds need explaining

to lay people. Housing progress only mentions new development. It must be stated what has been done to improve the Council's social housing stock.

Please state what progress has been made against each objective.

Theme C4: Using Clean and Green Energy

We agree progress has been positive and are extremely pleased that work on renewable energy generation at your sites is ongoing.

However, it's disturbing that the cost of electricity from certified renewable energy sources has become cost prohibitive when it is the cheapest energy to produce. We still expect the Council to secure energy supplies from low or clean forms of generation by 2030 as prices will drop compared to more polluting generation.

Where is the Commitment to supporting local residents to set up Community Energy programmes themselves?

Theme C5: Waste Management

It's good that progress has been made but evidence should be provided about how each of the objectives have been progressed, as we have not been made aware of any progress. Any progress on reducing waste appears to be absent despite being the main theme of the commentary.

"Development is required to capture the waste management progress in the context of climate change" requires explanation.

Food waste needs a Quarterly campaign in schools in the Borough. League tables should be available for each street for food waste recycling by ward – this might increase take up (a low effort tally of number of bins collected?)

There is no mention of green waste collections being left outside to decompose in Harefield – surely a source of significant methane emissions. What is being done to measure, minimise or eliminate these?

Theme C6: Climate Change Adaptation and Mitigation

It is disappointing that the climate change adaptation and mitigation action plan is still being pushed down the road with no progress made.

"Progress against this objective is positive largely due to the work on air quality [insert "by the Mayor of London"]"

Progress on the objectives below must be listed:

- C6.4 To run a campaign to get residents involved and sharing ideas with the council to find solutions for climate mitigation and adaptation in the community.
- C6.5 To investigate opportunities to integrate environmental improvements into existing buildings for example, living walls, green roofs, habitat walls, bird, and bat boxes.
- C6.6 To run an annual campaign to raise awareness of the impacts of reducing green spaces, paving over gardens and increasing hardstanding.

Theme C7: Carbon Offsetting

The level of tree planting and ongoing green space management is adequate. We agree that more work is required to align this work with the objectives of the plan with particular focus on the biodiversity work, which needs to be progressed further. Progress or lack of needs to be stated for each of the objectives.

It needs to be stated whether the tree planting figures include HS2 net tree planting.

Theme C8: Sustainable Transportation

"Work against this theme needs to be captured in the context of this Plan so as to ensure there is alignment against the climate change objectives" needs to be explained.

The original commentary was "*The survey clearly told us that we need to do more to promote walking, cycling, public transport and electric vehicle infrastructure. Residents were keenly aware of the need for safe cycle routes and facilities to encourage a reduction in vehicle usage, which in turn would improve air quality by reducing other harmful emissions.*" yet very little has happened other than the work with TfL.

The school campaigns mentioned should be listed and the outcomes measured.

The Cycle Strategy has been written but is very weak and lacks any substantial or impactful plans.

We agree that further work on a sustainable transportation strategy needs to be programmed to ensure all the sub objectives of this theme are given attention. And that importantly the work against this theme needs to be captured in the context of this Plan to ensure there is alignment against the climate change objectives.

Again, progress for each of the original objectives needs to be evidenced.

The Council should request more digital displays at bus stops, possibly by suggesting TfL could also use them for adverts. This would lessen the need for people to get their mobiles out at night to check bus times. Important in a borough with lots of Heathrow Airport shift workers.

Theme C9: Transparency, Communication and Reporting

We agree this is an area where progress needs further development. Please state if there has been any progress on any of these other than C9.4?

4. Our Own Operational Carbon Footprint

We congratulate the Council for:

- moving to LEDs for street lighting.
- replacing 1,000 illuminated bollards with non-illuminated types.
- securing £13,751,385 through Phase 3 of the Public Sector Decarbonisation Scheme (PSDS) to fund heat decarbonisation and energy efficiency measures.

It is good to see the falls in electricity and gas use, and the graph that shows how carbon emissions reduced as gas use swapped to electricity.

Detail should be added about what the Council intends to apply for in the next phases of the PSDS and other funding.

How the baseline has been altered must explained in detail.

The following statement is made in this section:

“As renewable energy becomes more common place in the grid, the amount of carbon associated with generating a unit of electricity is reduced. If the National Grid conveyed 100% of electricity from renewable sources, our carbon footprint from our electricity supplies would be 0tCO2”. Please explain what assumptions are being made in subsequent calculations about the energy efficiency of the grid, and the changes to that efficiency, particularly in the graphs on street lighting and fleet operations.

It is good to hear of the reduced vehicle mileage owing to improved routing, but the Plan must be changed from switching to more efficient vehicles with lower emissions to vehicles with zero tailpipe emissions. Lease prices of battery electric vehicles plus the cost of electricity are less than the annual fossil fuel bills alone. In processions, it's very embarrassing to be following the Mayor of Hillingdon's car with its autobesity and combustion engine when it could so easily be replaced with a fully electric vehicle. We do accept that the Council has not pursued low-emission vehicles at all costs as electric heavy goods vehicles (HGVs) are relatively new, scarce and consequently exceptionally expensive, however “large” needs changing to “HGV” in the document because only HGVs are dramatically more expensive.

Brunel University has ongoing significant research investment into hydrogen fuel for larger vehicles. There are within the environmental community serious doubts about the use of hydrogen, unless it is genuinely GREEN HYDROGEN (i.e. water broken down into hydrogen and oxygen by electricity, which in turn should be from renewable sources). However, we are left wondering whether any partnership working with Brunel is happening, or being considered, to take advantage of the expertise based at Brunel?

Small typo p16. “Commonplace” is one word. Typo page 20 “bollards” repeated.

5. Wider Climate Action Progress

The excellent tree planting statistics and number of Green Flag awards are very pleasing. Plans to keep trees alive should be added (in particular saplings) along with flagging the risk that more frequent wildfires may destroy the carbon sync, so this carbon offsetting should not be heavily relied upon.

Leveraging in funding from external sources to identify and prioritise areas for flood risk management is good.

The progress on levels of Waste Electrical and Electronic Equipment (WEEE) recycling is impressive, we applaud the new facilities at libraries and for Council staff. The same goes for increasing food waste recycling. WEE is a typo in your Plan. In fact, there are many typos on your page of waste examples.

“Energy from Waste facilities offer a modern treatment process that means your waste is used to generate energy in the form of both heat and power (electricity). This waste is used instead of coal, oil or gas to produce energy.” This is now the most carbon-intensive means of creating energy in the UK. For waste the carbon emitted by incineration needs to be stated and compared to that of landfill. *“Waste sent to be incinerated just north of Bristol”* – need to explain why waste is sent so far from Hillingdon and state whether it is sent by train or lorry.

Liaising with businesses about the importance of food waste collections and waste segregation is good but the Plan must state how businesses progress towards less waste and more recycling is measured. Explain what will be done to encourage retailers to provide less packaging and no single use plastics. Similarly good work with schools, but measures need to be stated.

On the page of waste examples, please change us to Hillingdon Friends of the Earth. On page 30, 13,000 is a heck of a lot of roadshows!

It is good that The London Plan sets out the planning policy for all new major development to be zero carbon and that the Council is implementing the recent planning changes to secure biodiversity net gain. The document states *“We will continue to develop how to exploit the biodiversity net gain opportunities within the borough to maximised benefits for our own natural environment”* which is an objective, so this need to be more specific, timebound and measured.

We applaud that the Council will continue to oppose runway expansion at Heathrow due to the extensive negative environmental and social impacts. The Plan must also specify how the Council will act to ensure fewer flights to and from RAF Northolt/London VIP Airport.

Instead of

“We have links to the neighbouring counties as well as central London and with less public transportation than other boroughs, the car remains a vital part of life.”

Change to

“We have links to neighbouring counties as well as central London and with less public transportation than other boroughs, the car will remain a vital part of life for many residents unless high-quality alternatives are provided.”

For *“...less public transportation than other boroughs...”*, the measure and Hillingdon’s position in the list must be specified (is Hillingdon bottom of the list?) Surely the main problem with public transportation in the borough is that it is more available for east-west journeys than for north-south journeys, particularly in the north and centre of the borough, in a borough which is about three times as “high” as it is “wide”?

It's noticeable that there is no reference to achieving better public transport. Even if the borough has limited influence over Tube and rail routes, there must be ways of achieving better bus routing, through TfL or not, and these must be specified. And for services to/from neighbouring boroughs, explain how difficult it would be to improve those.

Instead of

“This means actions to enforce a dramatic modal shift away from the car is likely to have significant negative social and economic impacts.”

Change to

“A dramatic modal shift away from the car should be facilitated (not enforced) because the Council acknowledges that in other similar conurbations where car use has reduced, there have been significant positive social and economic impacts.”

The defeatist and negative Cycling Strategy offers very little to feed into this Plan and misses many great value opportunities. It could have reduced car dependency and provided significant positive social and economic impacts. The School Travel and Road Safety (STaRS) Team training, Cycle Skills Sessions and Dr Bike events are great but in order to support active and safe cycling they need to be part of a much stronger Cycling Strategy that delivers many safe routes across the borough.

Page 34. “Efficient boilers”, there needs to be an explanation of why all boiler replacements in housing stock appear still to be new more efficient gas boilers rather than any heat pumps at all.

6. Actions for 2025-28

The removal of all the “Commentary” sections not only takes away the context, but it makes the revised plan less “user-friendly”, we cannot see any logical reason for its removal. It should be possible to repeat each Commentary verbatim, or to explain where and why it’s changed, as part of this “update” process.

Various comments have been made in what follows about specific actions being dropped. However, it has been implied that there are some actions that need to be taken – especially with business – beyond 2028. It is not clear whether these will be new actions to be added later, or whether some of them are among the items that have just been dropped. As it stands this is confusing, because it’s not clear which items have been dropped because they will no longer be done, and which because they will be done beyond 2028.

Theme C1: Community Leadership

The community engagement section appears to have become less detailed, with fewer specific actions aimed at involving residents in the climate response.

All in all, the reduction in this Theme from 14 Actions to 6, whatever the rationalisation that has been carried out, gives a clear impression that the Council is pulling back from the Leadership aspiration that was such an integral feature of the original Plan. If this a fair conclusion, the reason why must be explained, or that impression must be changed.

The 2021 Plan focused heavily on community engagement, with a goal to empower residents, businesses, and organisations to take climate action. It included plans for a comprehensive communication strategy to educate residents on sustainable living. In the 2024 Consultation, community engagement remains a focus but with less emphasis on concrete actions to involve residents. There’s a reduction in the level of detail regarding public campaigns or workshops. There is a stronger focus on “local leadership” from councils and businesses, rather than directly empowering communities to act. Community Leadership must be dramatically strengthened in this Plan as it can be coordinated with low cost and effort but yield high-value outcomes.

Why have the following objectives from 2021 been dropped with no explanations? Reasons must be given.

- C1.1 Align our service delivery to support and promote zero carbon community outcomes.
- C1.4 Devise strategies to improve existing buildings, with access to government funding for energy efficiency and decarbonisation of residential properties and businesses.
- C1.6 We will prioritise actions for fuel poor and vulnerable households, needing assistance with accessing grant funds to improve energy efficiency and reduce their energy costs.
- C1.9 To provide a dedicated online resource that is aimed specifically at children. To complement this with an annual schools climate action competition, to support learning and development in schools, offer opportunities to see real world examples of action being taken to tackle climate change and to identify ‘young climate champions.’
- C1.11 To support, promote and raise awareness of the use of sustainable transportation and ensure resources are available to allow communities to make transport changes that do not rely on polluting private transportation

C1.13 By the end of 2021 to develop and implement an annual engagement strategy that covers all interested stakeholders (e.g. residents, resident groups and associations, community groups, environmental bodies (i.e. Sustrans, Friends of the Earth and businesses).

Theme C2: The Council's Own Operations

Why have the following objectives from 2021 been dropped with no explanations? Reasons must be provided.

C2.4 We will introduce a green staff travel plan that encourages and promotes less business travel and commuting and the increased use of low or zero carbon travel methods.

C2.5 Undertake feasibility studies and act to install small scale low and zero carbon technologies in our own building stock.

C2.6 The procurement of all our new equipment and services will be measured against the objectives of this strategic plan.

has been replaced with

"R2.5 To ensure procurement practices align with the objectives of this Plan

Action Revised for short to medium-term recognising the Council motion that 2035 is the target date for Scope 3 emissions (i.e. those embedded within the supply chain)" This is too far away in a climate emergency.

Theme C3: Building Better Places

Presumably C3.1 to 3.6 should be R3.1 to 3.6, for consistency?

Objectives need to be set to improve the Council social housing stock. Please state what progress has been made against each objective.

It's disappointing that *"C3.7 To identify and promote opportunities for the increased provision of allotments"* has been dropped as they reduce food miles.

The 2021 Plan had a commitment to retrofitting existing housing stock, incentivising the installation of renewable energy technologies like solar panels, and supporting low-carbon heating systems. In the 2024 consultation, the action items are less aggressive in terms of implementation timelines and financial commitment. There's a shift toward encouraging "energy efficiency improvements" rather than specific targets for retrofitting and renewable energy installations. The language surrounding net-zero energy standards in new buildings has softened, with less emphasis on pushing developers to adopt high energy-efficiency standards immediately. Specific and aggressive but achievable targets must be added.

The Council's own housing stock has been omitted in assessing the Council's carbon footprint since 2022. The Council's target for decarbonising its stock must appear in this plan, even though the Private landlords are now obliged to meet this minimum standard by 2030. Page 34 identifies some progress but must identify a target for reaching EPC ABC for all homes.

The list of Council assets must not omit Council Housing Stock.

Upgrades of Council housing stock are seemingly very reliant on efficient (gas) boilers. It must be explained what, if any, consideration is being given to heat pumps.

"It is becoming clear that there is a good investment case for the combination of heat pump, solar and battery (either in the car or the house) when combined with a smart meter and time of use tariff. For many, their energy bills with this kit will be half their current gas-based bills, enough to repay the capital investment in a reasonable time period." (5 March 2024 Housing Today - Chris March, chief executive and founder of Climatise). The council must specify how it will help people obtain these technologies. Particularly as the Council says *"We want to use our leadership role to assist residents in making sustainable choices on their own properties"*.

Theme C4: Using Clean and Green Energy

It's a shame that

C4.1 To ensure and certify that the council secures energy supplies from low or clean forms of generation by 2030.

has become

"R4.1 To ensure and certify that the Council secures energy supplies from low or clean forms of generation by 2030 [add] where feasible."

Even as an environmental group, we still do not fully understand why local authorities must pay more for clean energy when it is cheaper to produce. Please provide a full explanation so that our group and residents can understand.

An objective must be added to install solar photovoltaic canopies over Borough car parks. Consider council property for a decent sized brownfield solar park (Gutteridge Works?)

Theme C5: Waste Management

This section has been oversimplified, with fewer bold actions or specific reduction targets included.

In the 2021 Plan a strong commitment to reducing waste, promoting recycling, and moving towards a circular economy was in place. Emphasis on reducing single-use plastics and encouraging businesses and residents to adopt zero-waste practices. Whereas in the 2024 Consultation waste reduction is still a priority, but the 2024 consultation lacks some of the concrete actions such as specific recycling targets or waste diversion goals. It focuses more on general strategies for waste management rather than specific waste reduction initiatives (e.g. plastics generally should be added, including reducing single-use plastics).

Why have the following objectives from 2021 been dropped with no explanations? Reasons must be provided.

C5.3 Provide an online resource for educational facilities to develop and implement waste reduction strategies. Monitor, record, and report on progress.

C5.6 Develop a community campaign to manage waste more sustainability and explore the potential to lead or support reuse and repair workshops for residents.

C5.7 Promote the importance and value of growing food, either individually or through community groups.

These objectives should be included "Avoiding the production of waste in the first instance is the ideal position to be in. We want residents to become more conscious about the role waste production plays

in decision-making. We also want residents to understand how waste generation can be reduced, we want to work with businesses and major generators of waste in the borough to identify creative and innovative ways to reduce waste and raise awareness. Resources and awareness campaigns will be run to support these objectives.”

Theme C6: Climate Change Adaptation and Mitigation

It is a shame that

C6.2 To put in place a water efficiency strategy for all Council operations (such as green space watering, depot operations and corporate buildings) then monitor, record and report year on year savings.

has become

“R6.2 To review the Council’s water consumption for its own operations (such as green space watering, depot operations and corporate buildings) and put in place measures to reduce consumption” to be more feasible.

Why have the following objectives from 2021 been dropped with no explanations? Reasons must be provided.

C6.4 To run a campaign to get residents involved and sharing ideas with the council to find solutions for climate mitigation and adaptation in the community.

C6.5 To investigate opportunities to integrate environmental improvements into existing buildings for example, living walls, green roofs, habitat walls, bird, and bat boxes.

C6.6 To run an annual campaign to raise awareness of the impacts of reducing green spaces, paving over gardens and increasing hardstanding.

Theme C7: Carbon Offsetting

It should perhaps first be said that “offsetting” as a principle has had an increasingly bad press, and that it appears that most carbon offsetting schemes don’t achieve their objectives. However, the entire idea of “offsetting” something is entity A paying entity B for taking carbon reduction measures that would not otherwise be taken. But by now, the scale of the problem is such that all those measures that might not otherwise have been taken NEED TO BE TAKEN anyway. So, we don’t need just to plant trees in Hillingdon to offset carbon reductions that are otherwise too difficult, we need to plant trees in Hillingdon regardless.

Here’s what Friends of the Earth said about offsetting, as long ago as 2020:

“The reality is that we – government, businesses and individuals – need to cut our emissions by as much as we can, as fast as we can. We also need to invest in projects that will remove carbon emissions from the atmosphere. It’s not either/ or, it’s both. The same is true of nature. We need to protect what nature we have left, and we need to restore habitats, not one or the other.”

While nature and biodiversity remain important, the 2024 version lacks the same ambitious vision for expanding green spaces or increasing tree planting at the scale of the original plan.

The original Plan had strong commitments to protect and enhance green spaces, improve local biodiversity, and increase tree planting. The goal of making Hillingdon a "green borough" with a focus on natural carbon capture (e.g., tree planting). While in the 2024 Consultation biodiversity and green

space preservation remain key priorities, but the focus has shifted slightly to managing the impact of climate change on existing green spaces, rather than aggressive expansion or rewilding efforts.

The 2024 consultation doesn't mention the specific target for increasing tree planting or biodiversity restoration as clearly as the 2021 version.

Why has the following objective from 2021 been dropped with no explanation? The reason must be provided.

C7.3 To promote carbon reduction practices and carbon offsetting opportunities for businesses and communities, linked to measures to tackle climate change in Hillingdon.

Theme C8: Sustainable Transportation

We are pleased no actions have been dropped. However, the transportation section has been somewhat watered down in terms of specific actions and timelines, particularly regarding ambitious electric vehicle (EV) targets and cycling infrastructure.

In the 2021 Plan there was a strong focus on reducing transport emissions through enhanced public transport options, cycling infrastructure, and EV adoption. Ambitious targets for expanding EV charging networks, encouraging car-sharing, and reducing car dependency.

The 2024 Consultation has a continued focus on reducing transport emissions, but the actions are less specific. For example, while there is still a mention of EV infrastructure, the 2024 version lacks a clear target for the number of charging points. The number of chargers available in Hillingdon should be benchmarked annually with other London Boroughs. Competition amongst charge point providers should be encouraged with the aim of providing a diversity of options and lower costs to the consumer. Neighbouring boroughs have multiple providers, and options such as lamp post charging which is currently not an option in Hillingdon. The option for council approved cable gullies, which are being trialled in other local authorities, should be available to Hillingdon residents.

There's a noticeable reduction in the urgency of expanding cycling infrastructure. The language has become more general, with less specificity about how to reduce car dependency or promote alternatives.

Reducing overall car use should be an aim that is clearly stated, and metrics should be provided through which progress can be measured.

ALL Councillors should attend full Council meetings by public transport twice a year.

A Transport Survey should be conducted amongst the population using a full page of Hillingdon People. It should be made into a competition to encourage people to enter – e.g. a shopping voucher for a shop in the Borough. It would assess residents perception of the safety of using public transport and the reasons why they do not use public transport.

Theme C9: Transparency, Communication and Reporting

Why have the following objectives from 2021 been dropped with no explanations? Reasons must be provided.

C9.3 In July 2024, undertake a review of this strategy which will be open to public consultation and engagement.

- C9.4 To develop and undertake a sustainability appraisal of each of the action plans to ensure they are aligned to the objectives of this plan.
- C9.5 Provide a climate action plan programme detailing target dates for the development of supporting action plans.

“R9.3 To establish a People’s Assembly to consider review of the Actions necessary to meet the Corporate Climate Commitments. Revised 2026 (Oct/Nov)” This is too far away, we’ll be at 3 degrees of warming by then, so this must be brought forward.

The motion adopted by the Council in November 2021, i.e. four years ago, committed to “holding an annual ‘people’s assembly’ with residents and relevant organisations to discuss and shape revisions to the climate change action plan”. It is really unsatisfactory that this has not been done, it is not being done now to “discuss and shape” revisions proposed NOW, and it is being kicked down the road until Oct/Nov 2026, i.e. five years after the motion was passed. There may be genuine reasons for this, but it really doesn’t look good, it looks like paying lip service to residents’ opinions. This failure should be addressed head-on in the revised Plan. Regular meetings with HFoE are really welcome, but they don’t fill this void!

There should be an annual Green Transition Festival involving the Council, local groups and business to encourage change.

With reference to the omission of C9.4 and C9.5, in the original Climate Action Plan, Section 6 “The Action Plans” identifies a plethora of downstream plans, explained as follows:

“The Strategic Plan is therefore a catalyst for a series of other more detailed plans that will include actions and targets following the consultation on this document. An Action Plan tracker will collate all the actions into one place and will be available online for a transparent understanding of the ongoing actions.” This has completely disappeared from the revised Plan, which presumably explains the omission of C9.4 and C9.5. It must be explained why? Is it not happening? If not, specify what’s replaced it.

Hillingdon Friends of the Earth conclusion

Establishing a People's Assembly must be brought forward to as soon as possible this year, as it is essential, low cost and effort – and we are in a climate emergency. HFoE can look to other Boroughs for best practice and research whether third party organisations can be brought in to facilitate them if required.

We have concerns about the reduction in urgency and specificity in key areas such as building retrofitting, transport infrastructure, and biodiversity restoration. The plan must have stronger commitments, clearer action steps, and specific targets that hold both the local council and developers accountable to the climate goals.

Much more must be done to support residents in the choice to be less reliant on cars, educate about the benefits of reducing consumption and lead them into taking action that lessens global heating.

It needs to be clearer which actions have been dropped and commentary from the original plan needs to be carried forward to this plan to keep the context and justify the importance of the effort. It should be possible to repeat each Commentary verbatim, or to explain where and why it's changed, as part of this "update" process.

There are dropped or watered down objectives that need to be strengthened:

- Retrofitting of buildings and ambitious renewable energy adoption has been toned down.
- Strong language around achieving net-zero standards in new developments has softened.
- Specific, measurable actions for expanding EV infrastructure, cycling, and waste reduction have been reduced or generalised.
- The scope of biodiversity actions (e.g., tree planting, rewilding) has been narrowed.
- Weaker emphasis on Targets and Specificity:
- The urgency and specificity of some actions have been weakened, particularly in terms of timelines and measurable targets for waste reduction, EV adoption, and nature protection.

HFoE, Climate Emergency UK and the Council must work together to put pressure on the Ministry of Housing, Communities and Local Government to make taking climate action a statutory requirement on local authorities, as this would open up many funding opportunities.

There must be a summary page in the consultation where de-prioritised actions are documented for future consideration/prioritisation.

There should be an annual Green Transition Festival involving the Council, local groups and business to encourage change.

Appendix 1

Friends of the Earth Local Action Group Charter extract:

We are:

Justice-centred: we understand the climate crisis disproportionately affects those least responsible for it and is linked to other social justice and rights issues.

We understand many of us have benefitted from the mechanisms that have caused the crisis. To help right these wrongs, we must continue to learn and question our existing belief systems.

Inclusive: to build a fairer greener future for everyone, we need to make sure everyone can be involved. We work in a way that's accessible, welcoming, and respectful of all. We reach out to people from communities that are under-represented, and we actively speak out against any form of discrimination.

Brave: we won't solve the climate crisis by sticking to the status quo. We need to step out of our comfort zone to stand up for what we believe to be right. We'll be open to new ideas, challenging ourselves to think and act innovatively. We won't be afraid to fail and will learn from our mistakes.

Collaborative: we need to work together to tackle the climate crisis. In our local action groups, we enable members to take on leadership roles, we share responsibilities, and we create opportunities for people to get involved. We're generous towards other movements and recognise the experience and value of others. We're open to building bridges, uniting communities and people, supporting each other, and sharing our knowledge and skills.

Action-focused: we're committed to securing action, and not settling for empty promises. Once a commitment is made, we'll be there to make sure it's seen through. And in our own campaigning, we're committed to being active and creative to help maintain a vibrant and lively movement.

Fun: it's a big crisis we're facing, but that doesn't mean we can't have fun solving it. We'll seek out the things we enjoy doing throughout our campaigning and work together to make our community action groups safe and exciting places for people. And we'll build our resilience by looking after ourselves and each other.