

Councillor Majid Mahmood
Cabinet Member for Environment
Birmingham City Council

Dear Cllr Mahmood

Route to Net Zero Annual Report for 2022, published February 2023

Thank you for the work you are doing on Birmingham City Council's Route to Net Zero. We are writing to highlight critical issues in the progress to date and request further action.

We are concerned that the pace of change towards decarbonisation remains extremely slow. The wealth of ideas and pilot projects listed in the report cannot compensate for the low level of implementation of sizeable projects that would have the required impact by 2030 – only seven years away. Birmingham still lags behind comparable cities. Initiatives presented as innovative in this report often show that the city is in fact playing catch-up and has yet to reach an adequate level of progress towards decarbonisation to secure a liveable future.

1. The need to focus on net zero and not on current compromises

- 1.1 We notice that the report foregrounds initiatives that may appear to be good compromises now but are in fact short-sighted and do not take the city sufficiently far down the route to net zero.
- 1.2 An example of this is installing boilers, however efficient they may be. Achieving net zero requires zero use of gas for heating, and electric boilers are not a suitable long-term solution. Air-source or ground-source heat needs to be used where possible. We appreciate that it remains hard to find good alternatives to boilers that are suitable for use on a large scale, but we expect the council to be urgently searching for suitable alternatives and lobbying national government for the necessary support.
- 1.3 Similarly, in the area of transport, while the report correctly states that 'a rapid shift is needed away from single occupancy private car use' (p.21), emphasis is then placed on encouraging car users to switch to electric vehicles. We believe this emphasis is misplaced and that priority should be given to reducing the use of all vehicles, thereby reducing traffic as well as the use of resources in vehicle manufacture and use. The report promotes the development of self-driving vehicles, as well as electric vehicles, by companies in the West Midlands, but self-driving vehicles will not necessarily reduce the numbers of vehicles on the road nor reduce pollution. Moreover, they remove driver responsibility and have not yet been shown to be safe on public roads, mixing with general traffic, cyclists and pedestrians, and present legal and insurance challenges. In addition, the report shows the tendency to tie positive measures, such as active travel initiatives, to sources of revenue that will hopefully be phased out, such as imposing fines on polluting vehicles.
- 1.4 We believe that energy efficiency should be prioritised ahead of energy production. It is not acceptable to provide electricity to homes by burning waste. As discussed in the section on 'waste' below, the Tyseley Energy Recovery Facility (ERF) does not contribute to low carbon but rather locks us into a system that produces carbon (with exorbitant costs for infrastructure). The

alternative to the ERF is not landfill, and the ERF is working against broader movements aimed at reducing domestic waste and processing it through reuse, recycling and so on.

2. The need to implement quick wins: low-cost effective initiatives over high-cost extravagant experiments

- 2.1 The report highlights several expensive and complex ideas, whereas the urgency of the climate emergency would be better addressed by simpler more cost-effective measures. To take transport as an example, hydrogen buses are an exciting development, if using green hydrogen, but they are still in the pilot phase. Similarly, the level of construction work on roads that can be seen in so many places in Birmingham is a much more invasive and costly approach than reintroducing parts of older networks that still exist, such as old train stations and the historic tram lines.
- 2.2 Another extremely simple but effective measure would be to focus on allowing pedestrians to move quickly around the city and obliging motorists to slow down. This could be facilitated through measures such as more generous timings on crossings and a return to a longer time on the 'green man'/green walking figure at pedestrian crossings.

3. The need to leverage the council's resources as a huge landlord

- 3.1 The report neglects the power of the council as an extremely large landlord to use its rental income or seek finance to address the immediacy of the climate emergency. It has the power to not only bring each home up to EPC Level C and thereby meet its existing responsibilities, but also to implement further retrofitting measures. Instead, the report appears to present as innovative initiatives, such as obtaining more accurate information, related to duties, such as conducting EPC assessments, which the council is already obliged to carry out as a landlord.

4. The need to take responsibility in relation to external funding

- 4.1 Birmingham City Council must demonstrate leadership in demanding that national government provides funding for the essential work involved in the multiple dimensions of decarbonisation. While we acknowledge that significant barriers to the success of new initiatives and projects lie outside the control of BCC, in particular the allocation of funding, this is no excuse for inaction. A large proportion of the activity documented in the report is for the submission of bids, and we suggest that pressuring national government for more funding, delivered efficiently, is critical.
- 4.2 If the problems generated by various inadequate and disjointed sources of funding are not addressed, the scale of projects will remain constrained, and the council will continue to implement small-scale contradictory projects that are the result of chasing pots of money distributed in short-term cycles rather than doing what needs to be done in the medium and long terms.

5. The need to engage with complexities and demand action for answers

- 5.1 We suggest that when assessing progress to net zero, the council ends its avoidance of complexity. Some areas of the report fail to acknowledge the reality of current retrofitting measures. For example, good insulation will only bring a house up to EPC Level C unless the house was built in the last decade or so, and solar panels are needed for a higher rating of B.

Demonstrating honest engagement with reality and then taking action on that basis to seek out and support the development of alternatives is also part of the leadership that we would expect the council to provide.

Specific subsections of the report

We would also like to raise the following points in relation to specific areas of the report:

A. Buildings

While we understand the difficulties in measuring and quantifying reductions in emissions, we are concerned about how many of the initiatives outlined in the report are leading to carbon emissions savings that are 'not known', 'not yet calculated' or 'potential'. Where figures have been given, they are for small projects making a small contribution to the overall required figure of 530,000 tonnes of CO2 emissions reduction per year e.g. the boiler replacement programme saved 1,782 (p.29) or 1,729 (p.13) tonnes CO2 in 2022 (across 1,200 properties) while the Whole House Retrofit project will save only 397 tonnes CO2 across the whole project.

The small scale of projects is of huge concern – for example the Gressel Lane scheme will only result in 36 houses and Dawberry Fields only 55 units, which means the impact of the green technology being used will only be a drop in the ocean. Similarly, the LADS2 retrofitting scheme benefited 102 properties and even the acceleration to 700 properties by March 2023 for LADS3, and the 114 properties in HUG1, is still a small number in relation to what is needed. Only 300 units will benefit in the Bromford Housing Retrofit.

A survey of solar potential on council-owned buildings is a step forward, but we urgently look forward to action in this area.

While the report gives information about council properties, there is a dearth of information about measures aiming to educate and support private homeowners and landlords, with the exception of the tool for corporate landowners. It would be valuable to educate everyone about proactive measures they could be taking to reduce their personal carbon footprint.

B. Transport

We are concerned about the lack of measures to improve public transport in terms of reliability and frequency as well as by expanding routes and making public transport more affordable to encourage people to use public transport more widely.

While the report acknowledges the need to lobby BCC's partners in order to work effectively on cutting emissions from transport, this must include lobbying government for the powers to re-regulate bus services. This would enable BCC and the councils comprising the WMCA to ensure a comprehensive network of frequent, reliable and affordable buses with a single ticketing system. Lobbying should also call for the devolution of bus service operators' grants so they can be targeted at low-carbon vehicles such as electric buses.

There appears to be several missed opportunities in the area of transport, including the following:

Cycling: the West Midlands hire-cycles programme has improved, but at the moment it is quite localised and there needs to be more support for partner organisations that are involved with the scheme and more support generally for encouraging people to cycle more. The council could map roads with wide grass verges that cover historic tramlines as these could form the basis of new cycle

routes through the city. Mapping these areas would help the council plan new routes or connect existing routes. These areas could also provide an opportunity to introduce wild spaces into the city. Putting more cycle stands in the city centre would be an inexpensive measure to help people cycle into town.

There needs to be a great reduction in the number of car journeys. Where more than one car lane exists these should be converted into cycleways and grass verges converted to more biodiverse green spaces.

Trams: the use of the existing tramlines is limited as currently the line is too limited to be widely used. Linking the existing lines to Digbeth coach station would be a useful step in connecting transport modes, and creating continuous cycle lanes to New Street station would serve a similar purpose.

Car sharing: in car share schemes, 20 people can share a single vehicle and people use cars less when they do not have a car on their drives. To make drive-sharing function in Birmingham, it is necessary to educate people on the advantages (and the existence) of these types of schemes and to allocate free spaces to park the vehicles.

C. Energy

Again, we are concerned about the lack of concrete action in this section. Many of the achievements listed are for activities such as securing funding, identifying zones and models, appraising options, developing plans, mapping, completing studies and holding workshops. Carbon emissions savings that are predicted to be significant include those from heat network zoning - but the report states that the engagement of council teams is yet to be achieved, the East Birmingham Energy Infrastructure – but only ‘if implemented’ following the more detailed feasibility study that is awaited, and solar photovoltaics – but the strategy for solar investment has yet to be prepared. As indicated above, we perceive some of the projects presented as innovative, such as district heating, to have been innovative some years ago.

We would like to see the council more involved in finding people suitable for participation in the ECO4 and similar programmes. While the report presents the council at the centre of the ECO4 initiative, ECO4 currently relies on the energy companies to find customers and we would like to see the council playing an active role in this.

D. Waste

We are very glad that the Route to Zero team is meeting with waste officers to develop a Total Waste Strategy. This should clearly state its aim as being carbon reduction, in line with BCC’s target and the science of the Climate Emergency.

It is not correct to say that the Tyseley incinerator currently contributes to low carbon, since its purpose is to turn rubbish into carbon dioxide (‘disposal’). The alternative is not landfill, since the rubbish mostly consists of items that should be composted, digested, reused or recycled – as is already the case in authorities with an effective separated collection system. Most buried waste remains underground for a long time and is locked out of the atmosphere. The exception is food waste which can produce methane, a greenhouse gas, but this will soon be separately digested and already is so treated in many authorities in the UK. Electricity exported from the plant displaces low carbon power in the grid and takes up the grid connection that could be used by renewable energy, such as solar. The whole process depresses the recycling rate and burns what might have been reused, recycled and potentially sold.

We want this contract of 2024-34 to be truly transitional, i.e. to run down and phase out incineration. By 2034, carbon dioxide will be taxed so as to reflect its actual environmental damage. No innovative technologies are required, only best practice, as it already exists elsewhere. We strongly support having a state-of-the-art Materials Recycling Facility in the city and one or more anaerobic digesters. Past projections of increasing tonnages of rubbish have been proved utterly wrong and the whole of public policy and investment is against it increasing in future. Waste should be prevented or utilised, not disposed of in the form of pollution of land, water or air. National government is aiming to at least halve residual waste by 2042 as stated in The Environmental Targets (Residual Waste) (England) Regulations 2023. UKWIN has calculated that we are already close to overcapacity in incineration in England.

There needs to be a plan for the transformation of the collection system, and central government may soon enforce best practice, but Birmingham households will have to be involved in designing a system that is convenient and easy for people to understand and then it will have to be properly communicated.

We also note that while the council has been generating an income from electricity sales, this income may not in fact be secure (as well as being the wrong policy for environmental reasons). The high price of electricity is due to its link to world gas prices, and there is a consensus that the link must be broken. Renewables do not need any fuel and a lot of wind power is coming on stream. 'Energy from waste' is only competitive for as long as council taxpayers pay to pick up the rubbish 'fuel' (which may otherwise be sold for recycling). In addition, energy from waste plants in the UK could be disincentivised when the UK rolls out an emissions trading scheme later this decade.

E. Nature

We would like to see more detail about this section of the report, particularly of what exactly is being done with the £8+ million funding that has been secured. We support the focus on areas that currently lack green space, such as East Birmingham, and would like to see continued attention paid to green space at ward level, prioritising those wards that lack such areas.

We would like to reiterate our call for pesticide-free practices on the part of the council and to hear about progress in that area as well as on the pollinator strategy. We would also like to hear more about measures to address the likelihood of flooding in Birmingham more generally, and not only in the case study.

In summary, we call upon you to:

- move directly to zero-carbon solutions
- focus action on current best practice and reliable technologies
- facilitate a reduction in the demand for energy and prevent related problems
- be selective about growth and honest with the public about activities that need to shrink to meet the zero-carbon objective
- use best value, low-cost approaches and economies of scale to achieve the widest possible roll-out of solutions.

Thank you for taking the time to read this letter. We look forward to your response.

Yours sincerely,

Birmingham Friends of the Earth.