Bishop's Stortford Climate Group Response to Sustainable Hertfordshire Strategy

Overall we welcome the strategy and the commitments in it, but we would like to see the strategy being more evidently outcome oriented, showing the scale of delivery to be achieved through the proposed policies, particularly in relation to their ability to deliver towards the County's commitment to achieve carbon neutrality by 2050. The cost of the various policies is also not set out and there is no indication of how the £12m bid for supports the various policies listed. Nor can we see how the costs are provided for in the draft Integrated Plan, as set out further in part below. Establishing a Sustainable Hertfordshire capital fund, costing £2m in 2021/22 and totalling £10m over the IP period 2021 to 2025 provides some scope for pump priming, but without a clearer plan we cannot see how items will be prioritised for funding from this.

Energy/carbon mitigation - Corporate Emissions

Aiming to be carbon neutral by 2030 is a great goal and we support this. And we support the central focus here of removing fossil fuels from vehicles and buildings – rather than offsetting. In the strategy itself there is no specific programme to fit heat pumps/remove gas boilers from schools/council buildings. However since this the strategy has been published we are aware that HCC has applied to the Salix fund for public sector heat decarbonisation. We obviously welcome this. But this ties in with a wider issue that there is no plan across the county or even at district level for heat decarbonisation (see "Heat").

Energy/carbon mitigation - Area Wide Emissions

Here your target ("before 2050") is less ambitious than most of the districts, many of whom have based their targets on net zero by 2030. We recognise that:

a. The feasibility of achieving an earlier net zero date is dependent on central govt enabling measures
b. Some of the measures will need to be delivered by or in collaboration with districts

However we believe HCC should

a. aspire to a more concrete net zero date than "before 2050" and
b. develop a robust plant to deliver this

Schools

Approximately 20% 0f Herts population is under 16 years old, they are the generation who will suffer most if climate change is not reversed.

The policy does not give sufficient weight to schools sustainability. There are 486 Primary, 151 secondary and 127 colleges (16-18) in Herts. population. Many school buildings are old, badly insulated, have limited or no access to recycling services and the "school run" is a major source of traffic congestion and air pollution in all Herts towns and villages.

Specifically:

- School travel: 4.20: Cycle training good but safer roads needed, speed reduction strategies are not mentioned in the policy, they should be. Air quality, how about notices around every school to insist that engines are turned off, not idling.

- 4.29: Health walks good, how about walk/cycle to school initiatives? Effective ones!
- P 20: Lead, Enable, Inspire: Greater financial support to enable schools to achieve C reductions is essential.
- 7.2: The aim for C neutral schools and school transport is great, clear strategies for funding and implementation are essential.
- 7.3: Good to see a schools energy management programme here. Important to specify that schools also need strategies to prevent overheating in summer, again, poor school buildings means this is an increasingly important issue as summer temps rise.

Heat

What is missing from this strategy and indeed District action plans is any concrete strategy towards the decarbonisation of heat. There is clearly a role for local government here to develop strategy to ensure the fastest/lowest cost method is adopted towards heat decarbonisation given local resources/circumstances. This could identify what secondary heat sources there are available and work with UKPN to identify how - in light of grid restraints. As an example Ware could source much of its heat from heat rejected by GSK's cooling. Hertford could use a combination of the river source and aquifer source for heat pumps and any new developments could be mandated to follow the strategy for a specific area. BEIS have stated they intend to launch a consultation on heat planning and zoning in early 2021. A study commissioned by Vattenfall and Heat UK found that policy approaches which consider contextual differentiation, such as zoning, could reduce decarbonisation costs by up to £10bn. The Sustainable Herts Strategy should state the County's intention to develop in partnership with Districts a detailed Heat Carbonisation Plan.

Besides Salix the government has for the last 7 years funded heat network feasibilities through the Heat Network Delivery Unit and more recently provided up to 50% of the capital cost of heat networks through the Heat Network Investment Programme (soon to be replaced by the Green Heat Network Fund). HCC in cooperation with the districts should apply to this programme and develop a plan - and then implement it.

We note HCC intends to invest in solar photovoltaic farm at a cost of £26.5m at a disused gravel pit. We welcome this initiative but are there opportunities to collocate a heat pump /energy centre to supply heat to homes? This would give a lower cost of electricity to the heat pump/higher value for the electricity from the PV. Without knowing the location it's difficult to comment as to whether this might be appropriate. What opportunities are there to site solar thermal farms with pit storage to supply heat via district heating as in routinely done in Danish towns.

Waste & Resources

It is good that your offices send no waste to landfill and we support the range of initiatives proposed to stop using single use plastics and increase the recycling rate for Council waste. Many schools have no access to Council recycling services, this does not help with the strategy's aim to educate young people to adopt more sustainable life styles. The council property waste strategy should be expanded to include schools. (P15) Schools must be specified in 8.3.

In relation to waste disposal for the County, the recycling target of 65% by 2035 is insufficiently ambitious. Two districts within the County, St Albans and Three Rivers, are already achieving 63% and 64% recycling and composting, showing this can be achieved now. The Committee on Climate Change suggests that England needs to aim for 56% recycling by 2030 and a higher target than the current target of 65% by 2035.

There needs also to be a target for the CO2 equivalent emissions from the waste system in Hertfordshire. GHG emissions from the waste system arise from the collection and processing of waste, with emissions from landfill and some net emissions reductions from energy from waste disposal. Across England, waste accounted for 4.5% of UK gross GHG emissions in 2018. We would expect the County to have calculated the emissions arising from collection and disposal of waste and jointly with districts to set a target for reducing this figure.

Transport

Clearly the greatest sphere of influence for the County is transport emissions. Transport accounts for about 1/3 of the emissions attributed to the County. It is not clear from the chart on p28 how this significant reduction is to be achieved, with the small reduction shown as relating to transport.

The Sustainability Strategy pulls out key elements from the County's transport plans. In relation to the Council's own transport it sets out a range of good initiatives to reduce the need for travel and reduce emissions and seems to indicate in the chart on page 22 that its transport emissions reductions are a significant contribution to achieving carbon neutrality by 2030. It would be helpful if the plan set out how the initiatives support the expected planned reductions in this chart.

LTP4 sets an objective to reduce carbon emissions from transport but sets no targets for transport emissions reduction or modal shift in the County. Policy 19: says it will achieve its objective by a) Promoting a change in people's travel behaviour to encourage a modal shift in journeys from cars to walking, cycling and passenger transport. b) Addressing any barriers to and supporting the uptake of ULEVs in the county, particularly where this can positively affect areas with identified poor air quality. c) Reducing emissions from its operations.

The LTP 4 and the supporting strategies do not set out a convincing pathway to reducing emissions from Transport. The Plans set out a wealth of ideas for infrastructure and other projects to change behaviours, but without metrics there is no clear prioritisation of carbon reduction. The County's draft Integrated Plan provides some funding directly targeting projects to support modal shift, but the bulk of Highways funding is for business as usual, operations and maintenance, and the planning work for projects to support growth are not specifically constrained by the County's commitments to achieve modal shift and reduce emissions. Best practice in other local authorities commits to using all public transport, maintenance and other pots of funding, together, to improve infrastructure to support modal shift.

Clean air for all by 2030

Great that you acknowledge gas boilers as a problem which is often missed in the public conversation on air quality. Replacement of gas with hydrogen is being considered and the County should take a position on wider use of hydrogen in heating in light of Hydrogen's NOx problem (and inefficiencies vs electrification).

Recent evidence from AQMA monitoring shows that in 2018 emissions at Hockerill in Bishops Stortford and Sawbridgeworth rose again after periods of decline. We believe the county should be taking stronger action here to reduce traffic flows given that there will be many years before the penetration of electric vehicles into the national vehicle fleet reduce emissions to safe levels.

Triple the efficiency of material use in the county by 2050

It is not clear what this headline means nor how progress towards it is to be measured. This is recognised in the strategy which commits to developing a route map to deliver Hertfordshire's resource efficiency target, including setting performance measures for success. We look forward to understanding what this will involve that has not been covered elsewhere in the strategy.