

Welwyn Hatfield Borough Council
climatechange@welhat.gov.uk

Our Ref:

Your Ref:

27th January 2021 (by email)

Dear Climate Change Team,

Welwyn Hatfield Climate Change Strategy (WHCCS)

Summary of Key Points

CPRE Hertfordshire (CPREH) welcomes this document as a positive step, but it should do much more than record existing policy practice, references and intentions.

CPRE – The countryside charity, last year joined a national coalition calling for urgent action on the climate emergency. Our report 'Greener Better Faster' said the UK should meet net zero emissions as soon as possible with a target of 2045 at the latest.

A credible carbon reduction strategy needs to aim for net zero as soon as possible, should value the countryside and be aligned with a land use planning and transport strategy that emphasises regeneration, walkable neighbourhoods, low car dependency and traffic reduction.

Technically the strategy needs strengthening to:

- provide a clearer pathway to decarbonisation of Welwyn Hatfield
- include more baseline evidence, carbon budgets, reduction targets and identifiable markers.
- Evaluate delivery with monitoring at set intervals up to 2030 and 2050.
- Pathway modelling can then help the local authority to understand the most appropriate options for adoption

This is work with lots of new challenges. A framework for review by the Carbon Trust¹ is available, highlighting for instance the need for Scope 1, 2 and 3 Greenhouse Gas (GHG) emissions to be separately accounted for.

As the Committee on Climate Change (CCC) say every policy lever is required if net zero by 2050 is to be met. Governance and scrutiny is vital too; the action plans which members and officers will prepare should be with community engagement, subject of expert external review by qualified climate scientists and have cabinet level oversight.

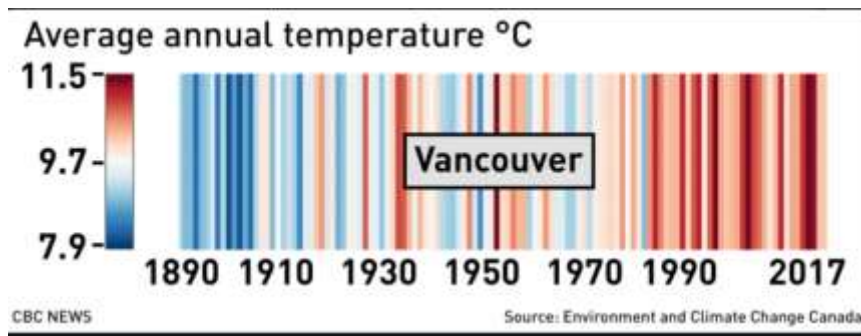
¹ <https://www.carbontrust.com/news-and-events/news/local-authority-climate-emergency-whats-next>

Opening Information / visuals

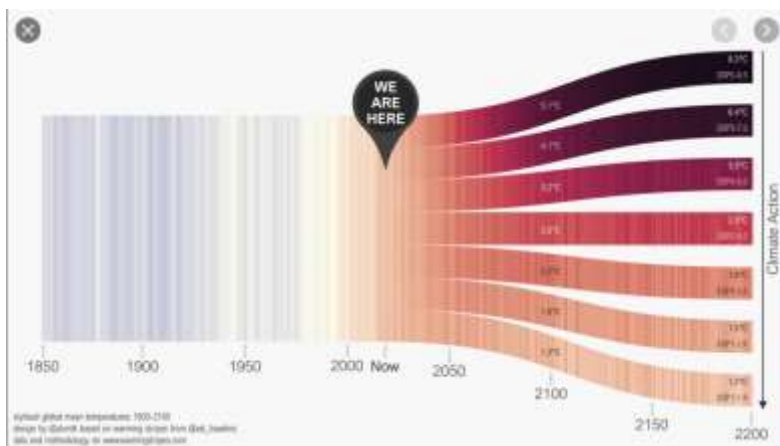
The introduction should re-emphasise the urgency of the situation; the climate emergency represents not only an unprecedented challenge and threat to biodiversity and the countryside, but even to the planet’s ability to remain habitable for humankind. The Climate Emergency is a fact if we accept the overwhelming view of the world’s scientists.

‘The rise in global CO2 concentration since 2000 is about 20 ppm per decade, which is up to 10 times faster than any sustained rise in CO2 during the past 800,000 years’

The strategy begins with some images of warming strips but no real explanation of what they actually mean. We would suggest that as well as more explanation, a warming strips chart that relates to the situation in Welwyn Hatfield would make it more locally relevant (see example below for Vancouver).



We suggest including graphics or a chart that communicates visually the future projected scenarios for global warming.



The Value of the Countryside

We would suggest that the strategy more clearly acknowledges the valuable role of the countryside as a carbon sequester, which also aligns with other biodiversity goals. The countryside is not to be seen simply as a convenient repository for excess housing demand.



We would like to see the strategy emphasise a ‘fabric first’ approach which means both to repair and improve the fabric of existing property (embodied carbon) as well as the effective fabric of towns and villages (regeneration). This needs to be done while supporting the most vulnerable sections of society who cannot secure decent well insulated affordable housing.

We suggest the strategy demonstrate zero carbon objectives and zero tolerance of empty and underused land and buildings, safeguarding greenfield and countryside for enhanced offsetting, biodiversity, sustainable drainage and human wellbeing.

CPREH welcome the aim to enhance river corridors but a programme is needed for all river corridors to be appraised and enhanced as sustainable wildlife and movement corridors. This can raise public awareness of the river environment, its condition, critical water shortages and the impacts of over-abstraction.

Land Use Planning

CPREH believes the strategy needs to inform and be integrated with low carbon land- use planning strategies. For instance, it does not explain that the local plan target of 12,000 new homes over the next 15 years, assuming an average new dwelling comprises 50-80 tonnes of CO₂, will of itself generate 600,000 – 960,000 tonnes of CO₂ emissions. This equates to 7 tonnes for every resident of Welwyn Hatfield whereas the Committee on Climate Change UK (CCC) latest Sixth Carbon Budget (December 2020) says per capita emissions need to be reduced to 3.5 tonnes pp by 2035, and the IPCC report has forecast the average per person footprint needs to be reduced to 2.3 tonnes CO₂ by 2030 (the current UK average is approx. 5.6 tonnes).

A strategic shift is needed to value embodied carbon, to repair, recycle and optimise more of the existing building stock as well as upgrade its energy efficiency. 80% or more of the stock that will be around in 2050 is already built. How is this stock to be made more efficient? How is it encouraged if the local planning focus is always to new build?

The NPPF says planning should support the transition to a low carbon future and shape places in ways that contribute to radical reductions in greenhouse gas emissions. The Climate Action Strategy needs to build on the provisions of the NPPF.

Place shaping means reversing trends to centralise health, education and other services in car dependent locations but to foster mixed use walkable neighbourhoods so that people’s main daily needs are all nearby, ideally within walking or cycling distance. We suggest the Strategy adopt this with targets and monitoring against current baseline figures.

The strategy should say that new masterplans and design codes should incorporate this walkable neighbourhood concept and other measures that align with a zero-carbon strategy. The National Housing Audit 2020 revealed not just far too much poor and mediocre design especially in rural areas, but predominant patterns of car dependency². So an aspiration to promote walking cycling and public transport is not itself sufficient.

² National Housing Audit for England by Place Alliance UCL and CPRE – Jan 2020

The Place Alliance report *Home Comforts*³ Oct 2020 demonstrated how too many people in the pandemic were uncomfortable in cramped homes and that 3 million did not have adequate access to green spaces in walking distance of their homes, anything within 10 minutes. Welwyn Hatfield needs to assess areas on this basis and address green space deficiencies. CPRE Hertfordshire feel that stronger commitments to greening existing places are needed. The planting of 300 street trees each year does not seem adequate or related to a baseline assessment of need; it is not ambitious enough when there are many treeless streets that need shading for climate adaptation.

Transport

While transport is a matter shared with the County Council, the Strategy must foresee and lead a shift towards sustainable transport modes to reduce emissions as well as to prioritise the countryside. Transport is the UK's greatest carbon emitter as a sector and with high car ownership in Welwyn Hatfield there has to be a clear pathway to reduced car dependency and car ownership. The strategy should reveal the current pattern and figures for Welwyn Hatfield and then a pathway to reduce them.

The strategy however refers to 'Improving traffic flows' but not traffic reduction. It doesn't explain that the only acceptable way to improve flows is when vehicular traffic levels are reduced; not by road building which will increase emissions.

The strategy needs to include carbon budgets and show it means to decarbonise travel. This means a transformation in travel with zero emission public transport, electric bicycles and other active travel measures. Local targets for vehicle reduction and for increasing the amounts of walking and cycling are needed.

This shift may not be easy but with good planning, with broadband expansion and for sustainable transport, it can bring cleaner living environments and less stressful lives. A modal shift is in the interests of drivers too as it frees up existing road space for essential vehicle use.

Re-using and recycling 'greyfield' land, brownfield land currently taken for car parks, garages etc, helps to reduce countryside loss. Better public transport also helps household incomes burdened by costs of maintaining extra cars.

The government has already set out a transport hierarchy in its Decarbonising Transport publication but it needs to be supported by funding decisions, carbon targets and local programmes of investment in active travel and clean green public transport such as new local rapid transit routes perhaps targeted at the young and elderly, which can bring reduced traffic and congestion.

The strategy needs to consider the use of important policy tools already available such as local parking taxes, road charging, road space re-allocation, traffic filters which make sustainable travel options the natural first choice.

³ http://placealliance.org.uk/wp-content/uploads/2020/10/Place-Alliance-Homes-and-Covid-Report_2020.pdf

Governance / Decision making

The strategy needs to enjoy cabinet level support. The action plans which the members and officers group will prepare under the strategy should be subject of community engagement and review but also expertly review by qualified climate scientists or bodies such as the Carbon Trust. There could be a formal collaboration with the University of Hertfordshire's Centre for Climate Change Research. CPREH believes the transition from carbon must be equitable and democratic for rural areas so we support the setting up of a representative citizens panel / assembly for long term engagement and governance.

Welwyn Hatfield's Organisational Goals

The Council itself aims to achieve a net zero-carbon status by 2030 but this should not be reliant on offsetting. The Council should use its own procurement and land ownership to secure best practice standards for new development to meet zero carbon goals and be prepared to exceed current statutory obligations and national requirements where this brings effective carbon reduction. The council can play a role in developing and supporting green finance measures to enable local beneficially climate action projects and green businesses.

Other initiatives

In housing the strategy needs to go beyond current practice. The replacement of old boilers in Council Housing by new boilers is cited but seems wasteful and at odds with the policy to phase out gas heating in new homes by 2025. The technologies that are being promoted of air and ground source heat pumps need to be coupled with rapid roll out of building insulation. This can address high energy bills and the fuel poverty experienced by low-income households.

CPREH welcome the fact that the Council will offer carbon literacy training to members and officers but it should take a lead promoting carbon literacy skills in organisations, business and the wider population. Carbon calculators are already available. The IPCC say globally we need people's carbon footprints to reduce to an average of 2.1 tonnes CO₂ each year by 2030. The current UK average figure is 5.6 tonnes. What is the average for Welwyn Hatfield? What changes are required to bring it down to IPCC levels in the next ten years? The strategy should set out the kinds of changes needed to deliver such radical reductions.

Yours faithfully,

Tim Hagyard
Planning Manager