The countryside charity
Hertfordshire

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Standing up for Hertfordshire's countryside

Hertfordshire County Council
Sustainable Herts Team
SustainableHerts@hertfordshire.gov.uk

Our Ref:

Your Ref:

3rd February 2021 (by email)

Dear Sustainable Herts Team,

Sustainable Hertfordshire Strategy

Summary of Key Points

CPRE Hertfordshire (CPREH) notes this document is a first step only and views are being sought. It will be followed by further work. CPREH considers that as the full strategy evolves it should include rigorous baseline studies and targets. The current wording indicates undue reliance on existing policy, technological change and future government direction.

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. The production of local climate action strategies can provide a 'bottom up' method of setting out 'locally determined contributions' to the national net zero target by 2050. The county council has a major leadership role for Hertfordshire in this urgent work.

The Sustainable Strategy must comprise a credible carbon reduction strategy that aims for net zero as soon as possible. It should value and regenerate the countryside, and be aligned with a land use planning and transport strategy that emphasises place regeneration, walkable mixed-use neighbourhoods, low car dependency and traffic reduction.
Technically, the strategy will need to:

- provide a clear pathway to decarbonisation of Hertfordshire
- include baseline evidence, carbon budgets by sector, emission reduction targets and identifiable markers.
- evaluate progress with monitoring at set intervals up to 2030 and 2050.
- Include pathway modelling to help the local authority understand the most appropriate options for adoption

Climate Action Strategies provide new challenges for local authorities, who can provide local leadership and highlight the supportive measures needed from government to implement their action plans, not least in the areas of Transport and Construction. A framework for review of local authority climate action plans by the Carbon Trust[1] highlights the need for Scope 1, 2 and 3 Greenhouse Gas (GHG) emissions to be separately accounted for.

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

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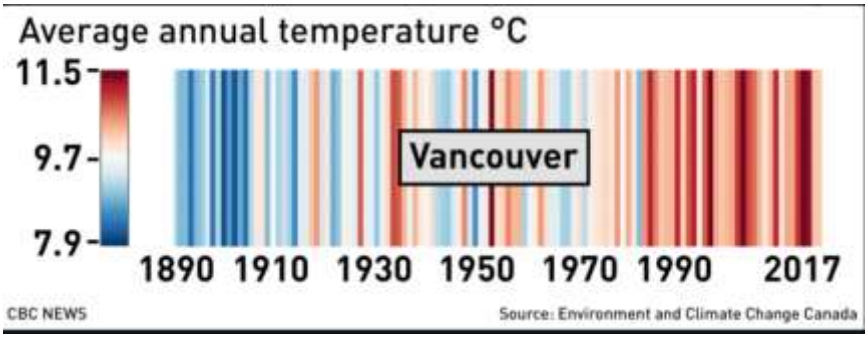
As the Committee on Climate Change (CCC) say, every policy lever is required if net zero by 2050 is to be met. Governance and scrutiny is vital; the action plans which members and officers prepare should include consistent community engagement, (e.g including a local citizens assembly) subject of expert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

Communicating the message

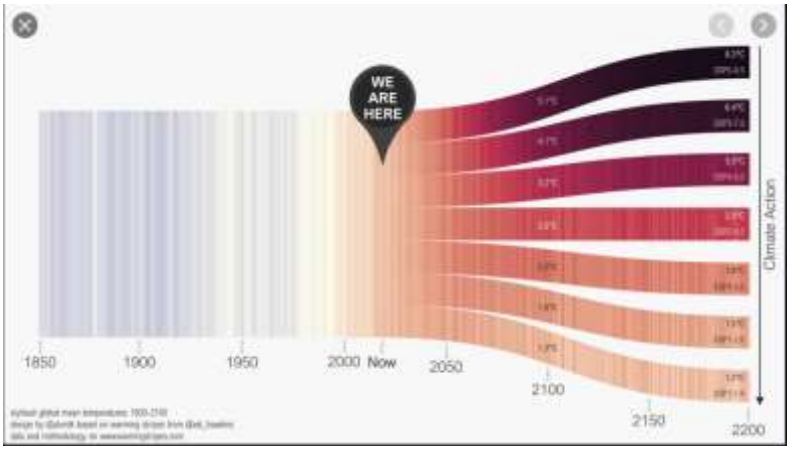
The strategy must communicate the urgency of the situation; the climate emergency represents not only an unprecedented challenge and threat to biodiversity and the countryside, but even to the planet's ability to remain habitable for humankind. The Climate Emergency is a fact if we accept the overwhelming 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 could use images such as warming strips to graphically illustrate the recording of change that is taking place . This explanation could accompany a chart that relates to the temperature records for Hertfordshire (see example below for Vancouver).



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



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The Value of the Countryside

The Sustainable Strategy must clearly acknowledge the essential role of the countryside as a carbon sequester, which also aligns with other biodiversity goals. The countryside must not be seen as a mere repository for development targets and housing sprawl.

We believe that a truly Sustainable Strategy has to 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 done while supporting the most vulnerable sections of society who cannot secure decent well-insulated affordable housing.

While national government changes to taxation and regulation can assist, the strategy must have zero tolerance for empty and underused land and buildings, safeguard greenfield and countryside for enhanced offsetting, biodiversity, sustainable drainage and human wellbeing.

A new Green Infrastructure Strategy is to be prepared. This should aim to enhance river and wildlife corridors with a programme of verifiable action to be appraised and monitored. River corridors particularly can facilitate sustainable travel, raise public awareness of the river environment, its condition, critical failings in sewage treatment, water shortages and the impacts of over-abstraction.

Land Use Planning

CPREH believes the strategy must integrate low carbon land- use planning strategies with targets and monitoring against reliable baseline evidence. For instance, the Hertfordshire Infrastructure Strategy 2018-2031 envisages at least 83,000 new homes. Assuming an average new dwelling comprises 50-80 tonnes of CO2, this may generate 4.2 – 6.6 million tonnes of CO2 emissions; equal to 5.6 tonnes for every resident of Hertfordshire. For comparison, 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 reduce to 2.3 tonnes CO2 by 2030 (the current UK average is approx. 5.6 tonnes).

The strategy will need to demonstrate a strategic shift from carbon. 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? Materials can make a difference; is the use of timber to be mandated to minimise the carbon footprint of new construction work ?

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 these provisions.

The Strategy must embrace place-shaping reversing trends to centralise health, education and other services in car dependent locations; to foster mixed use walkable neighbourhoods so that people's main daily needs are nearby, within walking or cycling distance. New car dependent locations which raise emissions must be ruled out. New masterplans and design codes should incorporate this low stress 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 dependency[2]. The Strategy must actually deliver; an aspiration to 'encourage' walking, cycling and public transport' is by itself insufficient.

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. Hertfordshire needs to assess areas on this basis and address green space deficiencies.

Transport

While transport is a matter shared with District Councils, the County is the Principal Council for Highways. Since 1997 legislation has required local transport plans to aim for traffic reduction, although in Hertfordshire, vehicle miles increased from 1997 to 2019 by 22% (from 6.6 to 8.1 billion miles). Even now the County is working to transport models that forecast traffic growth of 20% up to 2036.

The strategy needs to set out the baseline evidence and show how a shift towards sustainable transport modes will be made to reduce traffic, emissions and to regenerate its towns while safeguarding the countryside. Transport is the UK's greatest carbon emitter as a sector and with high car ownership in Hertfordshire there has to be a clear pathway to reduced car dependency and car ownership. Sustainable travel, traffic reduction and decarbonisation are the only acceptable way to 'improve traffic flows', new road building is costly and will only increase emissions and pollution.

The Sustainable Strategy promises Clean Air for all by 2030. Clean air needs to be defined; it must address the 31 Air Quality Management Areas (AQMA's) in Hertfordshire, all caused by traffic pollution, and go beyond that. The Strategy hopes that air quality and emissions will be addressed by the shift to electric vehicles. Aside from wider issues of car dependency, urban sprawl and road congestion, relying on individual purchase of electric vehicles alone won't deliver the necessary rapid reductions in carbon emissions as there would be a legacy issue of hundreds of thousands of petrol and carbon vehicles. (2019 - 0.74 million vehicles in Hertfordshire[4]). Moreover, particulates from the tyres and brakes of electric cars would remain a major source of air pollution.

The strategy must deliver zero emission public transport, electric bicycles and other active travel measures. Electric taxis and delivery vehicles could be mandated or encouraged by local road pricing. Local targets for vehicle reduction and for increasing the amounts of walking and cycling are needed within comprehensive LWCIP's. The shift to sustainable travel supports a regenerative approach with greater reuse and recycling 'greyfield' land, brownfield land currently taken for car parks, garages, showrooms etc, to enhance places and reduces countryside landtake.

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

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

[4] Department for Transport Statistics https://www.gov.uk/government/statistical-data-sets/all-vehicles-veh01

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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. Groups such as the young, elderly and low-income households would greatly benefit from reliable affordable transit and this can bring reduced traffic and congestion.

The strategy needs to explore the use of all policy tools already available such as local parking taxes, road charging, road space re-allocation, traffic filters which together promote sustainable travel as the natural and most attractive first choice.

Governance / Decision making

The strategy needs to enjoy cabinet level support. The members and officers preparing the strategy should do so with community engagement and review but also expert review by qualified climate scientists and 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. Any citizens groups should be referred to the report and recommendations of the first UK wide assembly on Climate Change which came up with a range of bold policy measures [5]

Other initiatives / Organisational Goals

The Council aims to achieve carbon neutral status by 2030, it's not clear if this will 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.

Working with the LEP and others, the County Council must expand its role in leading and developing green finance measures to support local beneficially climate action projects and green businesses. For instance, there is a huge need to develop local retrofitting business activity to bring housing stock up to zero carbon standards. This needs to be combined with nurturing accredited local enterprises skilled in new technologies of renewable energy such as air and ground source heat pumps. This can create employment, address high energy bills 'fuel poverty' experienced by low-income households.

The strategy should set educational goals to increase public and business understanding of carbon literacy as well as in house training of members and officers. Carbon calculators are already available but need to be adopted and promoted. The IPPC 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. It follows to ask the questions.

- What is the current average footprint for Hertfordshire ?
- What changes are required to bring it down to IPCC levels in the next ten years?

[5] The Path to Net Zero – 2020. House of Commons . https://www.climateassembly.uk/report/

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The strategy should then set out the pathways and changes needed to deliver such radical reductions.

Yours sincerely,

Tim Hagyard
Planning Manager