



Review of WBC Environment Strategy

WEST BERKSHIRE LIB DEM COUNCILLORS RESPONSE

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Contents

Introduction.....	2
Background.....	2
Overview.....	2
Vision.....	2
Offsetting.....	3
Waste & RRR.....	3
Environmental & Ethical Finance.....	3
Speed of Delivery.....	3
Detailed Feedback.....	4
Energy.....	4
Carbon offsetting.....	4
Transport.....	4
Buildings / Especially Commercial.....	5
Action Comments.....	6
General Comments.....	6
Other Feedback to the consultation:.....	6
Explanation for Generation & Power.....	6
Power needed and generation capacity.....	6
Example proposals submitted to EAG by Liberal Democrats.....	7



Introduction

Below is the feedback from the West Berkshire Liberal Democrat Group in relation to the Draft Environmental Strategy created by West Berkshire Council. We welcome its publication and wish to acknowledge the work done by officers, which is much appreciated.

Background

The declared climate emergency was seconded by the Lib Dems and proposed by the Conservatives. The Lib Dems helped collect signatures for the original petition, which was presented by the Greens. The final motion received unanimous approval at the council, meaning all parties agreed that something needed to be done and soon.

One of the first outputs from the declaration was to establish the cross-party EAG (Environmental Advisory Group), which we fully participate in and have been submitting regular feedback too. The Lib Dems have been regular contributors to the EAG with practical near term plans and solutions to move past the strategy to actual delivery.

Overview

We agree with the strategy statement (page 4) “This will mean being bolder, and prioritising investment in environmental projects to a much greater extent than we have to date.” However, we failed to find the ambition, detail, targets or proposed analytics that will ensure delivery and allow the 2030 target to be met.

A great deal of effort has gone into the strategy by officers (all of which is commended and appreciated). It is the Executive via the Environmental Advisory Board (EAB) that is controlling the final output and setting the tone.

We therefore urge the executive to work with all parties to define a clearer vision and allow us all to achieve the needed goals.

Vision

The draft strategy Vision section (section 4) opens well but starts to fall short of what’s needed when the key targets are spoken about. The Key targets described are of concern as they may contain significant inaccuracy, see energy later, but also because it seeks to start by using a lower number by not including scope 3 emissions. Although this makes the target more attainable it will leave the council open to criticism as there is currently no other plan to deal with these emissions before 2030.

The Liberal democrats propose working cross party and with the public to ensure improvements in the key targets area and have provided some detail about how to ensure the correct energy requirement is calculated.

Strategy Style and Emphasis

In general, we are struck by the repetitive nature of the document. It embeds a general theme of “we can’t do it alone,” which results in numerous get-out clauses for the Council if they fail to achieve the target set. There are at least nine different points in the documents emphasising non-delivery that lead us to this conclusion.



We note the current draft of the strategy is missing a key and well-recognised methodology for migration to sustainable and low carbon: i.e to prioritise according to the following sequence:

1. Use less
2. Increase efficiency
3. Find carbon-friendly alternatives
4. Offset what's left

This order can apply to Food, Transport, Energy, Heat, and almost any activity when trying to reach carbon Zero. It is also possible to achieve many of these things while saving money as exemplified with our [SMATE](#) and [SMATE 4Biz](#) documents.

These savings can justify, to a large degree, the investment needed during the transition and are things that could have already started.

We are proposing a reworking of the strategy to embed the philosophy above and take advantage of many of the concepts already provided to EAG

Offsetting

The document throughout seems to put offsetting as a core activity rather than the last thing we should do.

We are proposing that the strategy be altered to focus on Reduction, Reuse and Recycling (RRR) in parallel with the longer lead time renewable generation projects.

Waste & RRR

As part of a RRR program and as per long standing Lib Dem policy we ask the council again to remove the Green Bin Charge (Tax). It may be a revenue stream but delivers completely the wrong message that is needed going forward. The introduction in the charge has confused many residents who do not know that this is the bin for their food waste. Offering to remove the bins was also counter intuitive to improving RRR.

Their strategy needs to include measures that make a move to the RRR principles as easy as possible. The permit system for recycling centres is also giving the wrong message.

*We therefore propose **again** that the green bin charge is removed and suggest that the recycling centres become non permit centres for allowing a much wider range of recycling and possible reuse of products.*

Environmental & Ethical Finance

Completely missing from the strategy document is any mention of the borrowing strategy needed to support the environmental strategy and how that should be ethically based.

We propose Ethical Finance is embedded in the strategy and any following delivery plans

Speed of Delivery

Finally, the document puts most things off to the development of a delivery plan that is to come out of the strategy document. We have repeatedly stated that doing things sequentially rather than in parallel, in an emergency, would result in almost no real action in the 8-9 months since the emergency was declared. It will take several more months to create a delivery plan once we have an



approved strategy. So a year or more (10% of the time available) will have gone by, making it even harder to meet our stated aim of carbon neutrality by 2030.

We propose that the council using parallel activities based on proposals already delivered to EAG for consideration

Detailed Feedback

Energy

A major concern relates to the potential accuracy and understanding of the numbers when it comes to energy.

On indicative projects, it states that 11.5MW of renewable power would offset current demand. 11.5 MW is likely incorrect because the report states that current demand (annual) is 11.6M kWh, which is equivalent to a continuous power of 1.3MW. The strategy document also states on page 28 that they will produce an additional 10MW from renewable energy.

We can postulate why they have decided to specify a total of 21.5MW of new alternative energy production. Still, there is no explanation of the distribution of power needs throughout the day, the peak power required at any point, and what type of renewable power needed. Without detail on at least the first two, then it will be almost impossible to decide on a delivery plan for the type of alternative power needed.

Therefore the big question is, how have they arrived at the generator capacity needed?

Carbon offsetting

The WBC strategy identifies a starting point of 5.8 tonnes per person, and targets a reduction to two tonnes of CO₂ per person by 2030. While not carbon zero, this is still an ambitious target (see below)

Chart 3 Page 8 shows a declining linear red line upon which most of the strategy is based. One issue with this is that there is no discernible explanation of why the line will continue in this linear way through to 2030 except citing national datasets. Most of the UK decarbonisation so far has been the move away from coal to gas for energy production and, more recently, the increase in solar and wind farms.

These electricity carbon emissions reductions will be much more difficult over the next decade.

This red line becomes a blue line in Chart 5, Page 10. Chart 5 is repeated on page 28.

Given that the current strategy seems to rely on this assumed reduction and only seeks to tweak that linear line lower into a grey line, then any delivery plan derived from the strategy is likely to be wrong and may miss the stated target by several 100 kT carbon

The WBC plan requires an average of 40kT reductions per year with a target of 350kT in 2030. The 350kTonnes required is to be done by energy production and carbon sequestration. Of course, given the previous paragraph, there may be a need for 500-650kT of offsetting (*all numbers for 2030 are based on estimated data, but a West Berkshire carbon audit is expected shortly, which should allow some increase in confidence on the starting point*).

Transport

Council Fleet



One immediate concern was the lack of ambition when speaking about something simple like the council's own vehicles. It suggests we replace "wherever practicable" vehicles used by the council from internal combustion engine (ICE) to ultra-low emission vehicles (ULEV). It does not make sense not to dictate changing every vehicle to ULEV as soon as possible and go even further to zero-emission vehicles as they become mainstream during the next decade.

We propose that the strategy embeds a complete move to ULEV as a minimum whenever a vehicle is replaced and beyond this to zero emission as soon as lifetime costs become within 5% of each other (this should happen within 3-5 years)

EV Charge points

The use of the word exemplar when referring to EV charging points is inappropriate (An [exemplar](#) is someone or something that is [considered](#) to be so good that they should be copied or imitated) This is a West Berkshire Strategy. Nowhere but Newbury & Hungerford have any EV points. Most of those in Newbury are unusable as they have no priority for EV vehicles. It would be a major error to copy or imitate what's been done so far. Data from the 28 new on-street charging points shows that some 22 of the 28 have zero use, five very little and only one with regular use totalling 250 hours during October and November 2019.

As it is clear from the numbers so far that a parking strategy must be associated with any deployment of EV charge points, we propose that reserved bays are immediately created next to all existing EV charge points

Sustainable Transport

Sustainable transport highlights many of the right considerations, but given the recently reported cuts of 36% over seven years, a significant reversal of strategy is required. Bus services in rural areas are limited, and even a regular bus service between Newbury and Thatcham is inadequate (the latest bus on a Sunday from Newbury is 6.53 pm). A bus service that connects the Thatcham train station to the main bus route is completely absent.

We propose stopping any further cuts to transport and that an increased emphasis is placed on improving existing services to promote better use and therefore viability

Buildings / Especially Commercial

Although "Buildings" are mentioned at 6.1.2 and "Working with business" is mentioned at 6.2.7 we could find no mention of any strategy, such as linking business rates to EPC ratings, that would encourage owners of existing commercial premises to improve their carbon footprint by reducing their power and heating needs.

Our current Local Plan calls for new commercial buildings to conform to BREEAM Excellent. We should really be pushing for BREEAM Outstanding with council planners being more rigorous on this as too much is being let through and not achievable.

We propose that the council reinforces the need in planning to establish passive house standards for new builds and that commercial build requirements be lifted to BREEAM Outstanding immediately

Missing these key strategies leads to the need for more carbon offsetting as well as failing to encourage the green economy.



Action Comments

According to the strategy, the actions will be detailed in a 'Delivery Plan,' which will come later. However, there is no guidance as to when this will be made available in the strategy document.

Actions being considered (p14) do not seem to consider:

- Building insulation and airtightness levels
- Setting energy performance above building regulations for non-housing developments
- Identifying land appropriate for carbon sinks (as discussed at Climate Conference)

It is not clear in the strategy whether the principles will align with this approach.

We propose altering the strategy to take account of the additional points above.

General Comments

Economic growth needs rethinking to align with zero carbon principles. Assigning minimum environmental standards [p15] is insufficient if that increases the carbon loading.

UK Green Building Council (UKGBC) indicates that local authorities can set performance standards for new housing up to the equivalent of BREEAM Level 4 (already within the policies of West Berks) for the Code for Sustainable Homes and are **not restricted** in setting standards above the building regulations for non-housing development.

Other Feedback to the consultation:

- There has been no input sought direct from essential partners such as NTC or TTC, yet there is a recognition by WBC that it cannot achieve carbon zero in isolation and that they are an important partner [p17]. How will WBC be seeking input from local councils such as Thatcham and Newbury?
- When will the Delivery Plan be available for initial review, and should it be developed in conjunction with local town councils?
- The strategy paper refers to 'lobbying agencies in areas where CO2 emissions are outside its control' but does not refer as to what is the lobbying activity. Is it to reduce vehicle speed, divert traffic onto public transport, or something else?
- On waste, the strategy paper aspiration is to meet minimum service standards by 2025. To achieve the circular economy, plastic waste should be repurposed, such as that being explored by [Swindon Borough Council](#). The strategy refers to working with other authorities, and an approach to Swindon Council is encouraged.

Explanation for Generation & Power

Power needed and generation capacity.

Electricity generation is the amount of electricity a generator produces over a specific period of time. For example, a generator with 1 megawatt (MW) capacity that operates at that capacity consistently for one hour will produce 1 megawatt-hour (MWh) of electricity. If the generator operates at only half that capacity for one hour, it will produce 0.5 MWh of electricity. Many generators do not work at their full capacity all the time



For guidance, 1.3MW power is approximately equivalent to the power output from 2 wind turbines with a rated power of 5MW operating at 26% intermittency.

Example proposals submitted to EAG by Liberal Democrats

As EAG meetings have been designated as closed meetings. Therefore we are unable to reveal or discuss what is said at these meetings, an active choice of the current Conservative administration. Therefore the examples below are just the ones that were first sent to the press and therefore in the public domain before EAG meetings

- EPC linkage to business rates – Incentivise landlords to improve the environmental credentials of existing properties. Stop penalising them for making improvements that benefit the environment.
- Rapid expansion at all WBC buildings in their use of renewable energy
- Rapid reduction of energy used by WBC buildings for lighting and heat
- Rapid improvements in insulation of WBC buildings to promote more efficient heat energy use
- Using near free renewable energy during the night by storing and time-shifting the energy to when needed during the day on WBC assets (schools, offices etc)
- Working with the National Grid, Tesla and others to create a grid of batteries that can then time shift near free renewable energy at night for commercial and home use during the day
- The promotion of concepts outlined in the Lib Dem SMATE (Save Money And The Environment) document
- The promotion of concepts outlined in the Lib Dem SMATE-4Biz document
- The increase in accessibility to existing EV charge points by providing priority parking
- Public information campaign to savings associated with reuse coffee and the availability of free water



References and Resources:

SMATE Save money and the environment <https://adrianabbs.uk/Media/Default/documents/SMATE-4Biz-1.pdf>

SMATE-4Biz <https://adrianabbs.uk/Media/Default/documents/SMATE-4Biz-1.pdf>

Thatcham Town Council WBC response “TTC response to WBC Environment Strategy Q1 2020 v0.1.doc”

WBC Home page: <https://info.westberks.gov.uk/draftenvironmentstrategy>

WBC Environment strategy: <https://info.westberks.gov.uk/CHttpHandler.ashx?id=48361&p=0>

WBC Supporting Information: <https://info.westberks.gov.uk/CHttpHandler.ashx?id=48363&p=0>

WBC Climate Conference from PennyPost: <https://pennypost.org.uk/2019/10/the-first-west-berkshire-climate-conference-28-october-2019/>

UK Planning Policy Guidance for Local Authorities:

<https://www.ukgbc.org/ukgbc-work/sustainability-standards-new-homes/> [2019, UKGBC]

Example of ambition of other authorities:

Solar: <https://www.theengineer.co.uk/warrington-solar-project/>

Plastics: <https://resource.co/article/new-all-plastic-recycling-facility-pipeline-swindon-13030>