

Comments by Thatcham Town Council on West Berkshire Council's Environment Strategy 2020-2030

1. Thatcham Town Council (TTC) welcomes the issue of West Berkshire Council's draft Environment Strategy. Like West Berkshire Council (WBC) and Newbury Town Council, TTC has declared a climate emergency and believes the reduction of carbon emissions to net zero to be the paramount policy for local government over the next few years and decades.
2. We are pleased to see that the document focuses on achieving net zero emissions and contains data to show the scale of the problem and the potential effects of various policies. We believe this to be the right emphasis.
3. The document considers whether certain greenhouse gas (GHG) emissions should be excluded from the strategy as they are not under the control of WBC. These include emissions from motorways and major roads (principally the M4 and the A34 where they pass through the area), and EU ETS sites such as AWE Aldermaston, diesel railways and Land Use Change and Forestry (LULUCF) sites. The exclusion of these sources of emissions reduces emissions per capita in West Berkshire from 8.2 to 5.8 tonnes CO₂e. TTC does not believe such emissions should be excluded. Although out of WBC's control, they have to be allocated somehow to individuals, otherwise they risk being excluded from control altogether, and then the whole campaign collapses. Where emissions are outside the control of WBC and of West Berkshire residents, we would like to see them listed for lobbying of the groups or individuals who do control them.
4. We believe the approach described in para 3 above to be part of a philosophy that individuals must take responsibility for all emissions, including those emitted by travelling, by industry, by government and by schools and hospitals and other public services, in order to ensure that not only are all emissions counted, but that pressure by the public can be applied for the reduction of all public emissions.
5. The document is clear that it covers emissions from West Berkshire as a whole, not just those of WBC. We agree that it should do that. It states (p.24) that WBC could save just under 3,000 tonnes of CO₂ per year, less than 0.5% of the total offset target. Given that tiny percentage, we believe the document gives too much attention to reducing WBC's own emissions, rather than those of the area.
6. We believe that the tonnages of CO₂ required to be saved, shown principally in chart 5 (p.29) are artificially low. We do not believe there is evidence that the downward trajectory of emissions reductions will continue, nor that the sequestration target of 350 ktonnes is achievable. Therefore the gap, which is the tonnage that needs to be saved by measures to be introduced in the delivery plan, is too low. We would want all these figures independently underwritten by experts. Is WBC working with a professional organisation who will underwrite its claims and commitments? Reading University might be a potential partner. This is an approach followed by other councils.
7. The document talks in a couple of places about WBC providing leadership, but these places are relatively inconspicuous. We believe that such leadership is critical and that

WBC should step up and be very clear that it understands its leadership role, and this should show through in the document. TTC in turn will play its part in securing reductions in GHG emissions in Thatcham.

8. (P.15). If economic growth threatens in any way the achievement of CO₂ emissions reductions, then growth needs to be curtailed. In the long term economic growth on a finite planet is not sustainable and a new economic model will be needed. This first paragraph on p.15 should state that the provision of energy infrastructure, required to cater for growth, must come from sustainable sources.
9. The document talks of engaging the public and other organisations but there is little to suggest that WBC understands the degree of change in public perception of the problem and its solutions that is required. We believe a wholesale re-education of the public to be necessary and we stand ready to play our part in that. In particular people who either do not understand, or who do not care about, the climate change issue need to be reached. A primary aim of this re-education will be to achieve a significant reduction in the amount of energy used by the public. A series of face-to-face public events will be needed if public opinion is to be changed, which will need professional facilitation.
10. Discussions and consultation on the Council Plan to 2036 should be tied in with the environmental strategy. The two are inter-related. It will be essential for WBC to show that the commitments in the environmental strategy will run through its thinking on all its strategic plans.
11. The document could do with an annex that explains the technical terms used in this topic, in particular the difference between energy, power and peak power installed and the units used to measure them.
12. The document describes, in Section 6, themes for the saving of emissions. We note the claim that WBC has installed a large number of EV charge-points but we have not seen them and there are none in Thatcham. We think this is a false claim. The installation of charge-points is a huge incentive to the public to switch to EVs, but thought needs to be given to who will use them, when and why. Many EV owners will choose to charge principally at home, if they can install their own charge-point. If they cannot, they will need to know that any public charge-point they intend to use will not already be in use when they need it. These and other considerations about public charge-points merit a detailed study and consultation which TTC would welcome.
13. Specifically, in paragraph 6.11 on sustainable transport we would like to see a commitment to increase financial support for Bus Services; in paragraph 6.22, on managing carbon foot print, the document could mention increased use of LED as a contributor; and in paragraph 6.25, on planning development, recognising that a government consultation on Building Standards Part L (Energy Efficiency) has recently concluded, TTC would like to see a commitment by WBC to improvements to building standards that ensure that insulation and air tightness are improved relative to the 2013 Part L, together with a push for all local authorities to have the power to set higher building standards from 2020.
14. We believe that many of the sustainable transport initiatives described in the second column of page 18 have already been considered without significant impact, and significantly greater resources will be required if they are to be made successful.

15. We note on p.19 the amount of energy, by area, generated by solar PV. In particular we note that Wiltshire generates 593.5 MW while West Berkshire only generates 33.1 MW. Why the difference? We believe that a wholesale increase in generation of power will be needed, to include on-shore wind power, biomass and water power as well as solar. These will require relaxation of planning restrictions, a change to the perception of protection of the AONB and positive support from the Environment Agency. These are example areas of where WBC's leadership will be required.
16. Energy mapping is mentioned on p.20. There is no sense of the scale of the task required to improve the insulation of the area's housing stock, nor of any intention to require new builds to adhere to low-emission BREEAM, or PassivHaus, standards. The document should apply greater emphasis to new builds, and indicate that all new build from [say] 2021 must be carbon neutral. It is not credible to continue to build new residential or commercial properties that increase the carbon load, as this will increase the load that would require to be offset by 2030.
17. Where 'lobbying' of government is referred to it needs be backed up with clear, publically transparent, objectives that are accountable and answered by our MP. For instance, if government policy, such as on building standards, is too lax to force the delivery of net zero buildings, and thereby requires an increase in offsetting (because lower standards result in higher net energy loads) and greater cost to the tax payer, then local authorities should join forces to lobby central government to that increase standards. The government should not compromise on building standards in order, for instance, to incentivise the building industry to build more houses.
18. Similarly, WBC may need to lobby for the relaxation of restrictions on development in the AONB so as to permit the use of land for power generation as well as food production and recreation. Unless the world achieves net zero, the AONB will be under threat from climate change anyway. A more stringent land use policy should be developed, in consultation with all landowners and farmers, to facilitate a transition of land into more environmentally friendly uses without jeopardising food production.
19. TTC would welcome a section on what WBC might require from town and parish councils.
20. We would like to know the planned date of issue of the draft delivery plan. The delivery plan should focus on energy reduction and efficiency before renewable energy and offsetting. The clear priorities should be:
 - Make new-builds carbon neutral so as not to add to the carbon load;
 - Reduce the energy load of existing operations – i.e. work out what operations, transport movements or energy load are not essential and can be avoided;
 - Improve efficiency - e.g. what improvements can be made to essential operations, or to building fabric? The scale of the task of insulating the area's housing stock needs quantifying and should not be under-estimated. Central government would need to be lobbied for the cost;
 - Introduce offsetting - e.g. identifying energy generation schemes for renewables, land for biomass, solar, etc., but only when the other options have been fully implemented and all opportunities exploited.