

Harrogate Borough Council Carbon Reduction Strategy 2021 Revision Consultation

Zero Carbon Harrogate's Response

20 December 2021

Introduction

We welcome Harrogate Borough Council (HBC) setting out their Carbon Reduction Strategy (CRS) and having an ambition for the Harrogate District to achieve a net zero carbon economy by 2038.

However, we do not consider the current draft strategy to be stringent enough to deliver HBC's target of making their own operations net zero carbon by 2038, and we have some major concerns about key elements and details that are missing from the strategy.

Key Points

1. We welcome the revision of HBC's 2019 Carbon Reduction Strategy. Revising the strategy so quickly indicates that HBC recognise the rapidly changing landscape around climate change.
 2. We welcome HBC's stated aim of leading the district in becoming a net zero economy.
 3. We are concerned that there is a lack of recognition of the scale of change required to reach net zero and consequently an overall lack of ambition. The Strategy is based on the premiss that HBC can achieve the objectives by undertaking actions using a business-as-usual model, rather than by setting out
-

the actions needed to reach net zero carbon and showing how these could be achieved over the remaining 17-year timescale.

4. We are concerned that there are neither quantifiable actions, nor measurable success criteria included. No targets are set for either HBC or the public to gauge whether the objectives laid out in this strategy are being met.
5. We are concerned that while there is mention of writing an action plan to implement the strategy, no timescale is given for this. We suggest that a fully costed (carbon as well as financial) action plan be drawn up as a matter of urgency.
6. We are concerned that this strategy is called a "Carbon Reduction Strategy" and yet seeks to fulfil a net zero carbon target. Whilst a reduction in carbon is essential, other actions must also be taken if we are to meet the science-based targets on climate change. These include addressing other greenhouse gas (GHG) emissions, generating sufficient renewable energy and ensuring carbon offsetting can mitigate for some GHGs that will be extremely difficult and costly to eliminate.
7. We are concerned that HBC are not using a recognised definition for their net zero ambition. There seems to be a lack of clarity around the scope of HBC's net zero ambition. Scope 1 and 2 are clearly included and Scope 3 to some extent but there is no mention of what level of offsetting will be required to achieve net zero and whether this will be achieved through removal alone or a combination of both reduction and removal.
8. We are concerned that no figures for the council's own operational carbon emissions are included in the strategy, which makes it hard to prioritise actions.
9. We are concerned that the strategy does not appear to be costed and there is no indication of how HBC intend to fill any shortfall in funding.
10. We are concerned that the strategy is missing a communications theme. We are aware that there is a poor track record of communication from NYCC/HBC on how specific projects fit into the bigger picture of climate action. This leads to a poor public perception on all sides of the debate. For example, with the introduction of bike lanes and low traffic neighbourhoods, there has been no indication of how extensive, sensitive and well-informed communications will be delivered to address public concerns, and bring residents and businesses, across the district, onboard with the challenging changes needed to reach net zero.

Detailed Response

1. Chapter One: Introduction and Scope

1.1. Introduction

- 1.1.1. We agree with the statements on the current impact and urgency to act on climate change set out in this chapter. While we believe that even more rapid transition to a carbon negative economy is required, we recognise that the 2038 target is drawn from the Tyndall Centre research and advice for the Leeds City Region.
- 1.1.2. We note that '84% of local residents wish to see immediate action to address carbon emissions.' We are concerned that this Strategy does not reflect sufficiently respond to this call for a clear focused programme for 'immediate action', and therefore does not meet the requirement of local citizens, employees and businesses.
- 1.1.3. We welcome the recognition that climate is impacting lives and livelihoods now.

We are concerned that there is no mention of strategic action on climate adaptation and resilience, either for HBC's own estate or in planning for preparedness in the district.

1.2. Scope of the Strategy

- 1.2.1. We applaud HBC's recognition of their unique position to exert influence across the district as well as determining the GHG emissions of their own estate.

2. Policy Context

2.1. UK Policy and International Agreements

- 2.1.1. We are concerned, that while the current national policy context is set out clearly here, there is no mention in the strategy of the opportunity to challenge this policy. Current national government policy is falling behind the advice given by the UK Committee on Climate Change and this is impacting on the Harrogate District's ability to reach net zero. We suggest that HBC undertakes to actively advocate for a change in policy that would help them meet their objectives.

2.2. Responding to the Coronavirus (Covid-19) Pandemic

2.2.1. We welcome the recognition given to the changes in our culture as a result of the pandemic. We suggest that a greater emphasis be given to supporting the shift to more home working and the need for open spaces, particularly through the Place Shaping and planning application process.

2.3. Current Harrogate Borough Council Policies and Other Local Initiatives

2.3.1. We are concerned that we have an inadequate policy framework to underpin the net zero carbon 2038 ambition.

2.3.2. We are pleased that the Economic Growth Strategy is being revised.

We are concerned that the level of economic change needed for the transition to net zero is not recognised. The revision will need to do more than “add more emphasis on green growth”, to support HBC's ambition. We suggest that HBC should be supporting local businesses to decarbonise their energy and supply chains, actively engaging to fill the skills gap needed for highly skilled “green” jobs, and seeking to attract inward investment from zero carbon businesses and renewable energy generation. Additionally, the Economic Growth Strategy will need to bear down on those economic activities that have a high carbon footprint.

2.3.3. We are concerned that HBC's Local Plan does not have adequate policy provision for climate mitigation, adaptation and resilience. Written in 2014, it is now significantly out of date with current climate science; placed based climate mitigation, adaptation and resilience solutions; major national policy changes over the intervening seven years, and does not take account of HBC's 2038 net zero target.

2.4. Local Government Reorganisation

2.4.1. We are pleased that collaborative working with neighbouring councils is already being undertaken on carbon strategies, ahead of the start of the unitary North Yorkshire Authority in April 2023.

We are however concerned that this strategy does not set out how this collaboration might progress. We suggest that an assessment is made of the potential areas that may disrupt the delivery of the HBC strategy. We suggest that clear non-negotiable actions are set out now to provide the thought leadership necessary to propel the new authority into immediate action to build on the good work already in progress.

2.4.2. We are concerned that no mention is made of North Yorkshire County Council's 2030 net zero ambition and how this strategy might align to their target date.

2.5. Regional and Sub-regional Policies

2.5.1. We welcome this strategy's alignment to regional initiatives. We assume that this draft strategy will be updated prior to adoption in light of the recently published Yorkshire and Humber Climate Action Plan?

3. Carbon Budget for the Harrogate District

3.1. Carbon Budget

3.1.1. We welcome this carbon budget approach to the district's emissions, although we are concerned that the figures and interim targets given in this section are not applied to any of the Strategic Themes.

3.2. CO₂ Emissions in the Wider District

3.2.1. We welcome the intention for engagement across the district that is set out in this section.

We are however concerned that it does not go far enough to exploit all the opportunities open to HBC to support this transition. More details are given in the Strategic Themes section below.

3.2.2. We are concerned that there is no strategy to identify and target engagement with high-emitting organisations in the district, for example Allerton Waste Recovery Park.

3.3. The Council's Corporate Carbon Footprint

3.3.1. We welcome the celebration of the climate action successes already achieved by HBC in this section.

We are concerned that to date this leadership has not always been effectively communicated to residents and businesses.

3.3.2. We would like to see the carbon accounting behind these initiatives, with the estimated or actual carbon reductions stated.

4. STRATEGIC THEMES

4.1. We welcome all of the strategies set out in this section.

We are however concerned that the estimated carbon impact of each initiative is not stated, neither is the potential financial cost. This prohibits prioritisation and planning for quick wins and longer-term actions. Lessons could be learnt from the Craven District Council Plan Climate Emergency Strategic Plan, published in January 2020, which does contain indicators of cost, timeframe and likely carbon, social and economic impact.

4.2. Strategic Theme 1: Domestic energy efficiency

- 4.2.1. We are concerned that there is no mention of renewable energy generation for domestic use, or strategic planning for local heat networks and micro grids.
- 4.2.2. We are concerned that there is no mention of renewable electricity purchase agreements.
- 4.2.3. We are concerned about the lack of detail on how HBC will “Make the most of available funding to retrofit housing with energy efficiency measures”. Will the highest emitting or most inefficient buildings be prioritised?
- 4.2.4. We welcome the intention to “Ensure that council housing is as energy efficient as possible”.

We are however concerned that the objective should be to make council housing carbon negative where possible.

- 4.2.5. We are concerned that the objective for the planning system only applies to energy efficiency, rather than putting policy in place to mandate for carbon negative new builds, with local renewable power generation, transport and other infrastructure, to support zero carbon lifestyles for residents. We also believe that this objective should apply to all planning applications, including extension and conversions, and not just new builds.
- 4.2.6. We suggest that HBC not only meet the Domestic Minimum Energy Efficiency Standard (MEEES) regulations, but go well beyond these.

4.3. Strategic Theme 2: Sustainable transport

- 4.3.1. We are concerned that there is no mention of developing a suitable integrated travel plan for the district.

- 4.3.2. We are concerned that the significant modal shift in travel culture required to reach the net zero targets is not acknowledged here. In particular the shift to all forms of shared transport and the reduction of long-distance travel supported by fossil fuel dependent infrastructure. We suggest including more clarity as to what a zero-carbon transport system would look like.
- 4.3.3. We are concerned that there is an implied reliance on a shift to electric vehicles (EVs). EVs have a higher carbon footprint than readily available forms of shared transport and active travel (lifetime emissions from an EV are approximately half those of a petrol car).
- 4.3.4. We suggest more details are included on supporting active travel, 'last mile provision' and shared transport. For example, reallocating street space, giving priority to pedestrians on pavements, supporting lower speed limits, developing local delivery hubs and providing charging points for e-bikes.

4.4. Strategic Theme 3: Land use and agriculture

- 4.4.1. We are concerned that there is no mention of the role of land use in the district, in relation to sustainable food production, biodiversity, carbon capture and storage, and climate resilience through flood and heat wave mitigation.
- 4.4.2. We would suggest that the tree planting strategy includes a recognition that a careful evaluation of each site and ecosystem is included.
- 4.4.3. We are concerned by the absence of a strategy regarding peatland management given the significant areas of moorland in the district and the value of peat for carbon capture and storage. We would suggest the development of a proactive strategy, working with Nidderdale AONB, NFU, local landowners and other key stakeholders.

We are also concerned that eliminating peat use in HBC's own horticultural activities is not mentioned.

4.5. Strategic Theme 4: Working with partners

- 4.5.1. We are unsure as to why this theme seems to be linked only to commercial and industrial emissions. We suggest collaborative working across all sectors and on all areas of emissions. For example, schools and colleges in the district will be key for skills development.

4.5.2. We welcome HBC's collaborative approach.

We are concerned that only a limited number of partners are listed in the strategy and that there are some notable omissions; for example, North Yorkshire County Council, Transport for the North, the Environment Agency and businesses.

4.5.3. We welcome HBC's support for the Harrogate District Climate Change Coalition, but are concerned that an overreliance to deliver large scale district-wide change is being placed on charitable organisation which to date has no paid staff.

4.5.4. We are concerned that to date HBC have not been very effective in communicating their carbon reduction success stories. We suggest that dedicated communications expertise is committed to this in future.

4.5.5. We suggest that HBC provides relevant information to the public about consumption emissions to help residents stop exporting around half of their current emissions to the places where products they buy are manufactured (often China and other countries in the Asia).

4.6. Strategic Theme 5: Influencing new development

4.6.1. We are concerned that the low cost, quick wins in carbon reduction, climate adaptation and resilience that can be gained through the planning system are not fully acknowledged in this strategy.

4.6.2. While we welcome a future Local Plan review, we suggest that developing a Supplementary Planning Document would be a faster interim step to ensure that proactive climate planning policies are in place.

4.6.3. We suggest that the Development Plan Document includes more than decarbonisation. Carbon negative developments are possible with integrated renewable energy generation and sustainable transport infrastructure. Carbon capture and storage through biodiverse natural climate solutions are also essential.

The generation of more renewable energy is a vital element of any net zero strategy, and yet little or no support for the energy generation infrastructure required exists in any current policies. We suggest that more accountability of the embedded energy (and consequent CO₂ emissions) from the manufacture of most common building materials is considered in all planning applications.

- 4.6.4. We are unsure as to why only the Ripon Barracks development is cited in the strategy. Decarbonisation needs to be embedded in every new home built in the district, as well as extensions and conversions to existing buildings. We suggest that HBC's own development sites, where the council has full control of the design and build, should be cited and developed to carbon negative standards (e.g., Dragon Road, Harlow Nursery, Frogmire, Dean Park).
- 4.6.5. We suggest that HBC proactively approach developers who seek to build properties to carbon negative standards and encourage sustainable, net zero lifestyles.

4.7. Strategic Theme 6: Operational council buildings and Harrogate Convention Centre

- 4.7.1. We welcome the carbon reduction initiatives outlined in this section.

We are concerned that there are no figures given for carbon savings, financial costs or any timeline for these actions.

- 4.7.2. We are concerned that there is no acknowledgement of the difficult decisions that need to be made around the embedded carbon cost of retrofitting some buildings, and how this will be weighed against energy savings.
- 4.7.3. We suggest that HBC work with NYCC to develop alternatives to the Allerton Waste Recovery Park, as it is the district's largest emitter of CO₂. In the short term the carbon footprint of the waste recovery centre needs to be reduced to a minimum by reducing the amount of waste sent there and by ensuring that its energy generation is maximised.

4.8. Strategic Theme 7: Operational transport

- 4.8.1. We suggest that HBC put in place a plan to electrify the waste collection fleet together with other medium and heavy vehicles.

4.9. Strategic Theme 8: Working practices

- 4.9.1. We suggest that all HBC staff and elected members undertake Carbon Literacy training and that the organisation itself work to become Carbon Literacy Project accredited.
- 4.9.2. We consider that immediate Cabinet-level action is required to push this vitally important area towards the top of the political agenda and ensure that the money, people, skills and programmes are put in

place to deliver the strategy that emerges from the adopted version of the strategy. A cultural change has to be started that can be carried through to the replacement authority, following the re-organisation.

- 4.9.3. We suggest that HBC develop a standard climate risk assessment to evaluate all decision making. The focus in all decisions must be 'how can our actions best mitigate, adapt and build resilience against climate change?'. Far-reaching options that reduce GHG emissions must be considered alongside the more conventional options.
- 4.9.4. We are concerned that the leverage that HBC can bring to bear across the district through procurement is not sufficiently recognised in the strategy. We suggest that HBC develop a climate procurement policy that leverages change through all their suppliers and contractors.
- 4.9.5. We would strongly support that the elimination of all single use products is included, not just single use plastic.

5. MONITORING AND REPORTING

5.1. Portfolio Responsibility and Review Date

- 5.1.1. While the council's cabinet member for carbon reduction and sustainability will clearly lead on the implementation of this strategy, we suggest that all cabinet members have climate considerations written into their brief.
- 5.1.2. To ensure the delivery of this strategy, the themes outlined within it will need to be identified as delivery priorities, embedded within the organisation and with all council staff responsible for them.
- 5.1.3. We suggest that this strategy is reviewed every two years, given the rapidly changing climate science and policy context. We strongly urge that the joint work already in progress to merge District and County Council policies and programmes fully encompasses work to achieve net zero carbon and climate resilience, so that valuable time is not wasted during the organisations' transition period.

5.2. Monitoring Internal Emissions

- 5.2.1. We welcome the intention to measure and publish the council's emissions. We suggest that this strategy is data driven, including these emission figures and the likely carbon outcomes from each of the objectives stated.

- 5.2.2. The definition of what emissions are included in the net zero target do not adhere to any formal standard (e.g., Science Based Targets or Race to Zero). We suggest that this definition is clearly set out to ensure all the organisation's emissions are included and can be measured and monitored.
- 5.2.3. We are concerned that no consideration seems to have been given to the "net" element of HBC's zero carbon ambition. We suggest further work is needed to estimate what level of offsetting will be required and to decide on an action plan for this, be it by removal only or a combination of both reduction and removal.
- 5.2.4. We suggest that interim targets are set to demonstrate progress and create a sense of momentum.

5.3. Monitoring District-wide Emissions

- 5.3.1. We are concerned that no timescale is set for the action plan mentioned here.