

# HIGH PEAK GREEN NETWORK

23/2/2020

Dear Jean, Mark

## Draft High Peak Council Climate Change Plan

Thank you very much for advance sight of your draft, skeletal, plan. We really appreciate the opportunity you've provided to us to comment on the document at this stage. This reflects the openness which has characterised the regular exchanges between our HPGN Liaison Group and yourselves, which we very much hope continues.

We submit below our initial comments on the document as it stands, consistent with our aim to act as a 'critical friend' of the Council in this area of work. We hope these are helpful and may help shape a serviceable plan, supported by efficient processes, going forward.

### **The Overall Draft Plan**

- We note, and recognise, the distinctions made between areas of focus in Parts 1 and 2 of the Plan, the latter being less under the direct control of the council. We note that you have included business and commuting travel of employees in Part 1, where these are usually (e.g. by the Carbon Trust) identified as Scope 3 emissions;
- We note, and commend, the efforts made to quantify baseline emissions in respective areas, acknowledging more work has to be done in some key areas. As we have stated previously, 'in order to manage, you have to be able to measure' and assembly of robust baseline data is key to doing so;
- We note the document continuously references CO<sub>2</sub> emissions. Whilst CO<sub>2</sub> is the most abundant greenhouse gas, we suggest the council adopt the conventional reporting currency of CO<sub>2</sub>e (i.e. carbon equivalent) emissions, which recognises the significance of other emission sources, such as , nitrous oxide and methane, which are of scale in particular sectors, notably in industry and agriculture respectively;
- We commend the recognition within the covering report to the Plan that it is a 'living document', which will – and needs to – be subject to significant changes over time. We suggest the final report sets out explicitly the minimum frequency with which the Plan is to be reviewed;
- In large part, the draft Plan is a set of principled commitments and observations of action the council might take to achieve its objectives. Much data and many programmes of activity are acknowledged as still to be agreed. In that sense, the draft as it stands is as much a set of proposals or focus areas as it is a Plan.
- The Plan is a welcome expression of the declaration by the Council, October 2019 of a 'climate emergency' and its commitment to achieve net zero carbon (equivalent) emissions by 2030. However, 10% of that period has already elapsed since the original declaration. The council may well have already fallen behind the pace it set itself to achieve that goal (around 15% year-on year cuts in emissions). There is a real need to 'up the pace' from now to deliver on its commitments. That argues for identification of concrete, measurable, achievements to be realised in the next year (2021-22), and the following year (2022-3). We would suggest that the likely, larger, Plan submitted for

agreement for implementation from April 2021, be accompanied by recommended measurable programmes of carbon-reducing activity to be delivered in the next 2 years;

- We welcome the covering report's commitment to produce a publicly accessible version of the Plan, populated by more data and incorporating clearer, concrete actions designed and scaled to deliver anticipated cuts in CO<sub>2</sub>e emissions. Without the latter, it is hard to see how the public can be motivated/engaged in Plan outputs. Indeed, it is more likely that public comments would focus on "what have they done in the last 18 months, what specifically are they going to do now?";
- For any suite of proposed actions, we would commend a clear framework by which to evaluate schemes/proposals, to make choices clearer for councillors and allow for prioritisation of tasks. The recent excellent FOE briefing document sent you on progressing transport improvements categorised all its proposals (at page 3) against the following schema – green =existing powers/ low cost; yellow = medium cost; orange = no powers/ high cost. Using such a simple framework, or something similar, would give the Plan added currency and expose choices to be made, now and in the future;

### **The Plan's Parts**

Given the Council's stress upon the need for an iterative process for development of a fuller Plan, and the relative lack of data and quantifiable commitments supported by specific, timetabled, actions, HPGN Liaison Group will largely refrain at this time from comment on specific actions you may be setting in train. These are, currently, couched in general terms, and do not, we consider, offer councillors – or the public – sufficient clarity around planned priority actions. We need to see more evidence of planned or alternative actions before we can comment meaningfully. We are happy to do so at short notice, when required.

We will, however, address below some key points relevant to Parts 1 and 2 of the Plan, where this bears on the overall approach the council appears to be taking.

### **Part 1**

- All proposed actions, within the council's control, need some indication at this stage of likely costs (even if only colour-coded 'low', medium', and 'high') linked to implementation;
- Where a principled commitment is made(e.g. moves towards 100% green energy by 2024), indicative interim targets should be identified (e.g70% by April 2022, 85% by April 2023), where possible;
- Offsetting is currently excluded for consideration within the Plan. We recognise offsetting is a contentious area, and opinion is divided about its merits. Too often, offsetting can be simply tokenistic and distracting. However, given the Council's commitment to be net carbon neutral by 2030, it will not be able to cut its CO<sub>2</sub>e emissions by 100% by then, so will need to consider meaningful and responsible offsetting options, which take time to mature and deliver. We commend a strand of work considering whether or not offsetting should be used as an interim measure, as part of the council's wider approach;
- The focus on staff skills, as presented, is on better skilling existing staff to engage with, and lead parts of, this agenda. We consider that the time taken to deliver this outline draft Plan, and the breadth of this agenda, argues for enhanced staffing focussed on identification of best practice, innovation and wider engagements to push progress on. Amongst Derbyshire's district councils which have declared net zero targets for 2030 or nearby, High Peak is already at risk of being an outlier in resourcing this agenda. Current information available to HPGN suggests that 3 such councils (Chesterfield, Derbyshire Dales and South Derbyshire) already have a 'Climate Change Officer', appointed, some with significant budgets, whilst a fourth, Amber Valley, has agreed to appoint to a further post, in addition to the part-time officer already employed. North East Derbyshire has some hours committed

to such work, perhaps similar to High Peak. Bolsover (which has set no date for achieving net zero status) and Erewash (which has suggested slower track to 2050 net zero) appear to have no such resource. 2030 is a demanding target and, in High Peak, one of the council's overriding priorities. We are strongly of the view that appointment of a medium level officer to be accountable for making links, seeking out best practice and helping co-ordinate approaches, would significantly assist the council realise its objectives.

## **Part 2**

This part of the Plan is, predictably, less developed. It is not much more than a (fairly restricted) list of potential activities, with some links to existing council policies and services. Acknowledging the difficulty of this territory, we consider it important that:

- The council and its constituent Climate Change Working Group (CCWG) consider how it wishes to progress consideration and actions in the fields identified (industry, agriculture etc.). The CCWG has already received presentations, some facilitated by HPGN, in some of these fields, but HPGN is not yet clear what messages are being taken forward from such presentations, and to where;
- Given the complexities of work in these areas, where HPBC has influence but limited power, partnerships are key to making change. We consider that the next 12 months offer opportunity to establish multi-agency 'task' or 'action' groups in these areas, after presentations in key areas already scheduled for the CCWG, to share reciprocal priorities, identify scope for joint work, and agree outline commitments for shared actions. We are not yet clear, despite the establishment of a 'biodiversity action group', whether such an 'action group' represents the council's chosen way to progress agendas in such areas. No equivalent has been established in the transport or housing sectors, where equivalent presentations have been made. The council would not need to always be in the lead role in such work;
- The prospect of a 'Climate Change Officer', at sufficient level, would be key to sustaining such action/task groups and be a route to improved information sharing, and collaborative action, between partners. This would also give concrete expression to the council's positive 'community leadership' role;
- We consider there are some key omissions in the prospective partners identified. Prominent amongst these are The Breedon Group (industry), probably the largest single point-source of emissions in the borough, the Woodland Trust (agriculture/land use), with almost unrivalled experience around agroforestry and wider tree planting, and the social housing sector (housing), which has established links to the borough council. Detailed work will no doubt identify more.

### **Progressing and Monitoring Plan Delivery**

We note commitments made to ensure delivery of Plan activities, which are to be embedded in wider performance monitoring systems within the council. We welcome that as an essential component of the overall approach needing to be adopted. But we have no sense of what that might look like, how specific that might be around delivery of CO<sub>2</sub>e savings, and the role of key corporate institutions (e.g. The Executive, the CCWG) in scrutinising such reporting. Greater specificity around this is needed.

We are of the view that, such are the challenges the council has set itself in this field, it might usefully consider what internal incentives can be provided to promote progress in specific areas. An example comes to mind. In the 2000s, councils signed Local Public Service Agreements with

government, to meet individually-negotiated 'stretch performance targets'. Achieving such targets came with financial rewards, and failure to do so meant forfeiture of such rewards. Is an equivalent of this, within the council, possible, offering one-off payments to service sectors which meet or exceed prescribed targets (say, 15% CO<sub>2</sub>e savings in any one year) from a corporate 'pot' established for that purpose, for reinvestment in the 'achieving' service sector? Since, in some service areas (e.g. staff mileage) reduced emissions are likely to be accompanied by reduced costs, there may be greater opportunity to identify funding for such a 'pot', making such a scheme, at least in part, self-sustaining on a recurrent basis.

## **Conclusion**

We hope these comments are useful to you. We unambiguously welcome the council's invitation to comment as we have. We stand ready to partner the council in its continuing deliberations, and to assist where we can. There is much to do. We look forward to learning of your responses to comments made, and are happy to elaborate on any points you feel merit wider discussion.

Please feel free to share these observations with others, including Anthony McKeown, as you think appropriate.

Yours Sincerely

Lorrie Marchington  
Co-ordinator  
for High Peak Green Network  
Liaison Group