

## **Wiltshire Climate Alliance Comments on Wiltshire Council's Climate Strategy Update**

**16<sup>th</sup> October 2022**

The latest update from Wiltshire Council demonstrates some real progress in addressing the many issues relating to climate change and Wiltshire Climate Alliance (WCA) welcomes this.

Nevertheless, there remain many aspirational statements, particularly in relation to addressing the significant county-wide emissions, within both the summary report to Cabinet, the Delivery Plan and the Council's Carbon Neutral report. All these documents deserve a more detailed review, which WCA will do in due course.

In the meantime, however, we feel it important to urgently raise some immediate issues arising from the recent Council press statement.

These are highlighted below.

### **Transport**

#### ***Active Travel***

Modal shift is a key part of reducing transport emissions, which is acknowledged in Wiltshire Council's Climate Strategy, and substantial amounts of Government funding are available.

Much is made by Wiltshire Council of its emerging Local Cycling and Walking Infrastructure Plans (LCWIPs). It should be pointed out however, these are a means to funding but do not, in themselves, deliver the results on the ground. To date, Central Government has provided a £2bn funding pot via Active Travel England. Wiltshire's share of its most recent round (Tranche 3) has been £0. Tranche 4 is due before the end of the year but so far there is no sign of any bids being prepared. The LCWIPs will be of little point if the Council does not actually submit and win bids to deliver active travel infrastructure on the ground.

The LCWIPs being developed also have a bias towards prioritising vehicles over cycling and walking, which is contrary to Government Policy as set out in Gear Change, and parts of the NPPF (in particular par 112a: <https://www.gov.uk/guidance/national-planning-policy-framework/9-promoting-sustainable-transport>). This is compounded by The WC Cabinet member for Transport statements about supporting motorists and not investing in any schemes that would cause inconvenience to motorists. Clearly, the investment that's needed is unlikely to happen if the politicians in charge maintain this mindset.

#### ***Electric Vehicle charging points***

The Council also makes much of supporting people into electric vehicle (EV) use and is in the process of updating the old public charging infrastructure. They have now procured a contract which delivers mainly fast chargers (7kw). This seems a very short-term offering to the public. For modern electric cars (with battery sizes 40-100Kwh), the default, unless you have hours to wait, is a rapid charger (43-50kw+). We are concerned that this short-term Council investment may turn out to be a white elephant.

More important still, the nature and scale of intervention needed for the transition to EVs (in order to meet the Council's and the Government's 2030 targets) is simply not acknowledged, other than to refer to the next revision of the Local Transport Plan, due for consultation at the end of 2023. In the meantime, critical EV charging infrastructure (e.g. on street charging points) simply isn't being put in place, despite Government money available in support of this.

### **Housing and the Built Environment**

We applaud the excellent news for tenants that the Council is retrofitting 5,000 Council houses and building 1,000 zero carbon affordable homes.

It is also positive that the Council are starting to talk to social housing providers and private landlords about improving dwelling quality, but this needs significantly more pressure. There are

over 50,000 rented dwellings that need attention and, with the energy crisis not going to end any time soon, this is critical for these communities.

There are however no concrete proposals for supporting retrofit on the existing 130,000+ private homes, other than broad guidance on how it may be done. The Council need to provide more positive support through, for example, soft loans. Unless the Council gets stuck into addressing the key issues (energy conservation in the existing housing stock being one of these), it is unlikely to shift the dial significantly in terms of getting to net zero.

### **Local Plan and planning policies**

There is little mention of the Local Plan in relation to the stated objective of reducing car dependency and the need to travel, despite nearly 90% of those responding to the Climate Strategy consultation agreeing with “locating new development to reduce the need to travel.”

Creating more commuter extensions and car dependent settlements, requiring more roads and generating more traffic, will substantially increase transport emissions and air pollution. The Climate Strategy needs to strongly influence the development of the Local Plan in this respect, rather than working in the opposite direction and generating large quantities of additional emissions, as it is set to do.

Crucially, if the Climate Strategy can't deal with these big issues, it will simply become another aspirational strategy rather than having a significant positive impact in getting the county to net zero.

### **Housing and highways**

To have real impact in the county, there needs to be a step change in the way highway and housing matters are addressed, particularly with respect to delivery. This includes zero carbon homes, 15 minute developments, more active travel provision included in any new developments.

Critically, the Council needs to demonstrate a commitment to net zero development, as part of the suite of policies in its Local Plan. Whilst ‘sustainable construction’ standards are mentioned, well insulated buildings are already required under the new Building regulations. Wiltshire Council needs to require ‘net zero’ development, as other Local Planning Authorities are, including renewable energy generation – solar PV and heat pumps – to bring the emissions down, and the need to offset any remaining emissions.

Does the omission of any mention of a net zero development policy in its plans imply that Wiltshire Council intends to allow developers to continue unsustainable development that continues to be carbon positive? The very idea of having to retrofit what is currently being constructed defies logic.

In terms of highways, there needs to be substantially less new road building, with much greater investment in both active travel and integrated transport systems to enable citizens to move easily around the county, without pushing up emissions.

The Local Plan, and the associated Local Transport Plan, are under review but continue to be pushed back further – both now not due for consultation until next year, having already been delayed - due out originally in early 2022, then late 2022, now late 2023. Meanwhile emissions continue to rise and communities struggle to understand how net zero will be addressed in their areas.

### **Waste**

Wiltshire's blue bin collections are a necessary tool, but much more is needed. To improve quality of recyclables and reduce the amount literally going to waste, there need to be food waste collections, at least in urban areas, where 68% of Wiltshire's population live. Anaerobic digestion can deal with all our food waste, feeding the land and providing fuel.

It is good to hear that Wiltshire Council intends to move zero emissions waste collection vehicles but questions remain about when this will happen.

We are also concerned at the Council's misrepresentation of CO2 from landfill and incineration. As they are well aware from the many incinerator meetings, there are no real CO2 savings from burning rather than landfill and the latest evidence suggests that the reverse is the case.

## **Carbon neutral council**

### ***Council's own Estate***

There seems to be excellent progress on being made on reducing emissions on the Council's own estate (approximately 0.5% of total emissions in the county) and, we agree that they are likely to make net zero by 2030, excluding all their external contracts and services (which amount substantially more emissions than the Council generates directly).

Questions remain about the extent to which the Council is addressing its outsourced (Scope 3) emissions, which aren't part of its commitment. This includes greater focus on the Council's procurement policies for goods and services.

## **Summary**

The Council's own Climate Emergency Task Group made serious recommendations in 2021, endorsed and reinforced by consultants, Anthesis in early 2022. The Council's own Climate team has now produced an initial set of delivery plans, which is encouraging to see. However, much more is needed, particularly with respect to decarbonising Wiltshire as a county.

Council leaders now need to stand behind these plans and ensure they are developed and delivered for all the people in our County.

## **Wiltshire Climate Alliance**

