



Warwickshire Climate Alliance’s response to Warwickshire County Council’s 2022 draft Sustainable Futures Strategy

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1. Overview and Headline Issues

We welcome the first draft of the “Warwickshire Sustainable Futures Strategy” (the Strategy) and understand that it responds to the commitment given in the WCC Cabinet Paper ‘Climate Change Action Plans’ dated 25 November 2021. The aims being:

- Build upon the commitments to tackle Climate Change in the current Council Plan 2025, with a focussed Council-wide Climate Change Action Plan to deliver its target for organisational Net Zero by 2030.
- Progressing the work to establish a county-wide Net Zero by 2050 Climate Change Action Plan, securing additional expert resources to work with all councils and their partners to build current climate change plans.

We recognise that this draft strategy is still work in progress and that the Council is seeking inputs through this consultation. However, we are concerned about the significant amount of work that still needs to be done to convert this strategy into robust and deliverable plans for the Council and the county, with clear goals, committed resources, a delivery organisation and the appropriate programme governance.

Our response to the consultation comprises two sections: this section, Part 1, gives a summary of the main points from our evaluation including recommendations. Part 2 offers a more detailed commentary on the main components of the Strategy, and expands on our reasons for our judgements and recommendations. It also contains some recommendations on specific points regarding the text of the Strategy.

Where appropriate we have provided a reference to the appropriate section of the Strategy for some of the following points.

We would like, at the beginning, to highlight one point that is central to Warwickshire Climate Alliance's concerns. We are heartened that the Council wishes that a **"community powered approach"** (p. 19) should be central to the Sustainable Futures Strategy, and is committed to "continue to engage and strengthen partnership working with local climate and community groups" (p. 21). Warwickshire is home to great energy and expertise on issues related to the climate emergency. We believe that the Council's climate emergency plans would benefit from the greater involvement of this local expertise. To achieve this, we propose that **the Council should set up specialist forums, made up of local experts, for each of the six themes presented here**, to provide input into the further development of the Council's plans. As an umbrella organisation including several community groups and networks, Warwickshire Climate Alliance and the Low Carbon Warwickshire Network would be well placed to assist in the identification of members of such panels.

1.1 Summary evaluation and recommendations

1. The Strategy provides a clear recognition of the general nature of the problems posed by global heating and climate breakdown, and a strong sense of the interconnection with biodiversity and cost of living crises. The identification of areas in which action must take place is correct.
2. The Strategy contains useful modelling demonstrating that existing national policy will be inadequate to achieve net zero emissions across Warwickshire by 2050, and will only achieve around 40% of the necessary reductions.
3. The Council should set a ‘high ambition’ emissions target for Warwickshire for 2030 (see **Section 2.3** below).
4. The inventory of County-wide emissions lacks detail, and the Strategy is thus not sufficiently grounded in factual analysis of local emissions. Information on gases other than CO₂, local consumption emissions, climate impacts and habitat destruction/biodiversity issues is also lacking. **The factual information should be expanded** to include these materials. We provide some advice on how to do this below (**Sections 2.1, 2.2**).
5. There is **far too big a reliance on offsetting** in the Council’s plan for its own decarbonisation. This is in part because the Strategy uses a methodology that does not seem suitable for setting 2030 targets. The Council should prioritise spending on decarbonisation measures before buying offsets. A more suitable methodology should be identified for modelling the Council’s own decarbonisation trajectory (**Section 2.5**).
6. There is insufficient information on the financial and human resources that will be required to deliver the proposed actions, or on the likely costs of achieving all the stated aims. This makes evaluation of the Strategy difficult. We recommend that the Council undertakes further analysis to prioritise the use of resources based on the return on investment (**Section 2.6**).

7. In many areas, plans are very underdeveloped. Much of the content refers to plans, options and investigations yet to be undertaken (**Sections 3.1-6**). A preliminary schedule and resources should be included for the publication of more detailed action plans.
8. The Council should follow Cambridgeshire in developing **a strategy for investment in renewables**, which would also create an income stream. It should appoint/train staff to undertake detailed investigations of the suitability of Council land and property for the instalment of renewables, and the financial strategies and investment criteria suitable to make this possible. (**Section 3.2**).
9. The Council should **divest the £94m invested by its Pension Fund** in fossil fuels (See **Appendix 1**). It should investigate the possibility of investing this money in local green businesses, following the Lancashire County Pension Fund (**Section 2.7**).
10. The governance arrangements need to be further defined. The strategy does not provide sufficient information about the County's organisation, and the resources that will be required to manage Council activities, and to monitor and report on activities being undertaken by others. We recommend that dedicated programme resources be assigned to undertake this role and to report to a separate assurance body as part of the overall governance arrangements (**Section 2.6**).
11. We recommend that the review of the Strategy should be annual, in line with annual reporting by the Committee for Climate Change and the District Councils (**Section 2.6**).
12. The Strategy should show how the Council's plans relate to the District Councils' plans and the contributions required from the private sector and the community to meet the emissions targets (**Section 2.6**).
13. **The Strategy should include a commitment to lobby central government** regarding the changes to national policy without which the County's net zero ambitions are likely to be impossible (**Sections 2.3, 2.7, 3.1**).

2. Overarching Issues of Strategy

2.1. Statement of problems and aims

The climate emergency is the single most important issue we will confront in the next 30 years, and the consequences of inaction will be catastrophic. It is therefore good that the Council is looking at what it can do in response to the climate emergency in its own activities, and within Warwickshire.

The Council correctly recognises the overlapping of the Climate Emergency with an Ecological Emergency and the Cost of Living Crisis. It is recognised that climate breakdown will disproportionately impact the poorest and most vulnerable, and that 'declines in biodiversity are directly related to declining wellbeing and economic prosperity'. It is recognised that improving energy efficiency will reduce fuel bills and that moving beyond the 'take-make-dispose economic model' will reduce costs to consumers as well as material throughput. We are glad the Council recognises that these emergencies are interconnected, and refuses to set them against each other.

The need to focus on Adaptation, as well as Mitigation, through a Climate Adaptation Plan, is recognised. There is, however, no discussion of adaptation needs within the more detailed sections of the document. This is also a missed opportunity for community engagement in climate action more generally, as it may sometimes be easier to involve people in adaptation efforts than in mitigation activity (e.g. flood defence work), but this active engagement may lead to behaviour changes more generally.

The Strategy should be expanded to include a discussion of adaptation including a survey of existing adaptation activities. The Warwickshire Association of Local Councils (WALC) is currently mapping local climate action groups, including flood prevention groups, that may be of use in this regard.

On p.8 it is commented that the fact that climate breakdown will disproportionately affect 'the poorest and most vulnerable', and the conclusion is drawn that the transition to net zero must be planned in a way that 'widens opportunities through the growth of high value, green-related business sectors and jobs'. Whilst we agree that climate action

and social ambitions must be pursued together, the reference to *opportunities* is misconceived. The poorest and most vulnerable are, *by definition*, those who have been and are *unable to take opportunities*, often because they are *unable to work*. This may be because of disabilities and/or mental health conditions, or care responsibilities. If the poorest and most vulnerable are of account here, as they surely ought to be, reference should be broader than to opportunity and the labour market, e.g. to public goods shared by all: cheap housing, public transport, education and social care.

2.2. Emissions and impact statistics

The Strategy needs to contain more detailed and diverse statistical information.

Our view is that a clear, concrete strategy to address problems of climate and biodiversity needs to be grounded in as precise an establishment of the facts as possible. Setting out the facts about the *local* sources of emissions, likely impacts of climate change, and local manifestations of biodiversity collapse, allows the problem to be clarified in terms that aid practical action. Without this, it is more difficult for the Council, and for citizens of Warwickshire, to identify which actions will have the biggest impact and to set priorities. This is particularly important given current limits of time and funding.

In this respect, we think the report prepared by Anthesis for Stratford and Warwick District Councils provides a fair standard against which to judge the current report.¹ By comparison, the AECOM consultancy seems to have underperformed in a number of respects.

The current strategy gives basic emissions information across Warwickshire, derived from BEIS statistics from 2005-2019. These put territorial emissions within Warwickshire at 5,140,000 tCO₂. Only the higher level subdivisions of the BEIS inventory of CO₂ emissions are represented: 44% come from transport, 31% from industry, 17% from domestic buildings; 6% from commercial buildings & 2% from the public sector.

There are three principal flaws with the presentation of GHG statistics:

¹ <https://www.stratford.gov.uk/environment/emissions-information.cfm>

1) The **figures given from BEIS need updating**. This is not only because updated statistics running down to 2020 were published in June, but because in the new release, *for the first time*, these figures are given in *carbon dioxide equivalent* (CO₂e) and also include emissions from two other greenhouse gases, methane and nitrous oxide.² By contrast, previous BEIS releases only accounted for CO₂. This is unsatisfactory as it **means exclusion of significant sources of greenhouse gases**. For instance, in Stratford District, 5.9% of emissions come from methane emitted by livestock.³ Air flights are also not included in these statistics.

2) **Only territorial emissions are presented** here, i.e. emissions actually produced within Warwickshire. **Consumption emissions, published by DEFRA, are missing**. On carbon accountancy principles, it makes sense for the ambition to be a net zero council to principally refer to territorial emissions, so that emissions are not double-counted. However, from the perspective of climate action it is important that we pull all levers that are available. After all, if other organisations try to reduce their consumption emissions, this will assist the Council in meeting its territorial emissions targets, where those emissions are produced in Warwickshire.

3) **Itemisation of emissions is very poor** here: emissions are only broken down into very high level categories such as ‘industry’ and ‘transport’, when it would be very easy to subdivide them further. Itemisation of emissions is not an academic exercise, as it clarifies precisely what needs to be done. For example, we know that (at this level of consideration) transport is the single biggest source of emissions within Warwickshire, and therefore that any decarbonisation plan is going to have to be in large part a transport plan. It should therefore of great interest that the BEIS statistics allow subdivision of the transport category by mode of transport, and also break emissions from road travel into emissions from motorways, A roads and minor roads.

It is in fact, possible for members of the public to download a report for Warwickshire using the Impact tool (<https://impact-tool.org.uk/>), which includes both territorial and consumption emissions, all greenhouse gases (in a unified CO₂e figure) and subdivision of emissions into useful subcategories. The report prepared by Anthesis for Stratford

² <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-greenhouse-gas-emissions-national-statistics-2005-to-2020>

³ See report at <https://www.stratford.gov.uk/environment/emissions-information.cfm>

and Warwick District Councils in 2021 is also clearly superior in its exploration of emissions within those two districts, and it is regrettable that the Council did not engage Anthesis rather than AECOM for the purposes of this report.

The discussion of the climate and biodiversity crises is entirely focused at a general level, with the focus on national or even international statistics. The report should also have considered the impacts of these crises in Warwickshire, which would have seemed natural in a report on Warwickshire response to these crises. This is a missed opportunity to show Warwickshire residents how these crises affect them, and thus to make a more concrete, impactful case for action. This would not be too difficult. For instance, the Met Office has forecast that in a world on average 2°C hotter, the hottest summer days would be 2.4°C hotter (though this was already realised this summer, in a 1.1°C world), and the heaviest winter rainfall would see an extra 6mm of rain fall.⁴ With 2°C of heating, Warwickshire Wildlife Trust considers that within Warwickshire, 15% of mammal, 17% of bird, 20% of plant, and 37% of insect species would be at risk of extinction.⁵

2.3. Emission reduction targets

The Council is committed to becoming net zero by 2030, and also sets out an emissions target for 2025. It is good that this target refers to Scope 3 as well as Scopes 1 & 2 emissions. The Council reports that some sources of Scope 3 emissions remain unaccounted for, and plans further work to more fully account for these. The Council is thus committed to high standards of greenhouse gas reporting for its own estate.

The Council needs to set a ‘high ambition’ target for 2030, for emissions across the County as a whole. The Council is also committed to achieving net zero carbon emissions across the County by 2050, in line with the current government’s national target. As this is said to be in line with national trajectories, this presumably must also imply alignment to nearer term national targets, e.g. the government’s 2030 target of 68% reductions by 1990 levels. However, the current document does not provide

⁴ <https://www.bbc.co.uk/news/resources/idt-d6338d9f-8789-4bc2-b6d7-3691c0e7d138>; Stratford District Council has received more detailed data from the Met Office on local impacts.

⁵ Slides shared from presentation by Warwickshire Wildlife Trust.

intermediate targets for Warwickshire as a whole, neither from an application of the government's 2030 target nor from any other method.⁶ The importance of a 2030 target is made clear by the fact that the IPCC is calling for at least a 43% *global* reduction by current levels by 2030. According to the Tyndall Centre, Paris alignment requires a 13.9% annual reduction, implying an 83% reduction by 2017 levels.⁷ The government's 2030 target is not sufficient to reach this. Without any county-wide 2030 target, the current report is inadequate as a guide to what is necessary to meet even government targets, let alone those implied by the Paris Agreement. This is surely not something that should be lacking in a strategy to respond to the climate emergency.

The Strategy includes a useful graph showing the results of modelling of the impacts of existing national policy on a) further grid electricity decarbonisation; b) house-building & other development construction; c) heating decarbonisation; d) vehicle decarbonisation (due to banning of new petrol/diesel vehicles) (p.12). **Information about modelling tools used, and the source of residual emissions, should be included.** This graph shows that existing government policy will not achieve the target of net zero by 2050 within Warwickshire, and will only achieve around 2/5 of the necessary reductions.

Without stronger government action, it is unlikely the Council will be able to meet its own net zero targets. **The Council should therefore commit to a lobbying strategy towards central government,** to make sure the necessary policy framework is in place. The current Strategy does not provide clear indications as to the areas in which this lobbying would need to take place, but we presume it would involve the improvement to building standards, and the areas the Committee on Climate Change has identified as currently most lacking in the government's Net Zero Strategy, such as the lack of a program of deep retrofitting for Britain's existing housing stock, and a program for the decarbonisation of agriculture.

2.4. The Council's own emissions

⁶ The Anthesis report for Stratford and Warwick Districts suggests a 'high ambition' 2030 target of 55% emissions reductions by 2018 levels – as the UK's emissions have already been reduced by around 40% since 1990, this is a more ambitious target than the government's.

⁷ See Anthesis report, p.34.

The Council's own emissions are responsible for only a small percentage of emissions within the County (19,500 tCO₂e, according to the figures given here, out of 4,951,200 tCO₂e in the latest BEIS figures). However, they provide a litmus test for the Council's seriousness more generally.

The Strategy should provide better contextualisation for its emissions, to better inform the reader. What are the buildings and facilities the Council owns or controls, from which these emissions derive? Schools? Social service buildings? Council offices? We do receive the information that reductions by 2030 are anticipated to come primarily from transport (28.5%) and building use (17.5%). It would be valuable to see these figures in absolute as well as percentile figures.

The report **should also link to the Council's detailed GHG Reporting**.⁸

In the Executive Summary, it is not clear enough that the targets given refer only to the Council's own emissions, and not to emissions across the County.

2.5. The Council's offsetting plan

It is deeply disappointing that the Council's plans for achieving net zero by 2030 rely so heavily on offsetting, and in fact, are more dependent on offsets than actual emissions reductions. The aim for a 46% reduction from 2019 commits the Council to identifying ways to reduce annual emissions by a further 3,100 tCO₂e over and above the baseline scenario. This still leaves annual emissions of 10,500 tCO₂e, which the Council is planning to offset.

There is no information given as to the source or nature of these offsets (unless they are to come from the local carbon market discussed below, in which case there will be less for local businesses to purchase). Nor is there any discussion as to where the money to purchase these offsets is going to come from, particularly as prices are likely to rise dramatically in an increasingly competitive market. On one estimate, it would cost

⁸ <https://www.warwickshire.gov.uk/buildingenergyperformance>

between £174,000 and £436,000 per annum.⁹ If only credits from carbon removal are permitted—and only such credits can genuinely offset emissions—they could cost the Council just short of £2 million a year.¹⁰ We believe any such money would be better spent on direct investment in decarbonisation projects, and if the Council is able to find this kind of money, it should begin such projects now.

Credible offsetting is based on the strategy that maximal emissions reductions should be achieved, and offsetting should be limited to residual, difficult to decarbonise sources of emissions. Indeed, the Strategy recognises this principle vis-à-vis 2050 decarbonisation (p. 12). However, there is little sign that the Council has approached its 2030 target with an eye to maximal emissions reductions.

The Council's targets are said to be derived from using the SBTi Target Setting tool for 1.5°C Sectoral Decarbonisation Approach. This is said to provide a 'science-based' approach compatible with the IPCC goal of limiting global heating to 1.5°C. This is immediately problematic as the internationally recognised target for limiting global heating to 1.5°C (or rather, for a 50% chance of this) is net zero *by 2050*. The tool's purpose is apparently to inform companies of the *minimal* targets they will *need* to meet, in order to remain compatible with *that* goal. It does not therefore seem suitable to provide information on the more ambitious targets that might be adopted by an organisation seeking to achieve net zero by 2030. Moreover, materials at the SBTi website seem to indicate their tool, which is sector specific, is not adapted to public authorities. The SBTi tool therefore does not seem appropriate for developing a 2030 decarbonisation strategy.

This is apparently confirmed by the graph on p.14, in which it looks like the tool has drawn a line between the figure for current emissions (as of 2019) and the figure of 0 emissions for 2050, and simply located the values for 2026 and 2030 along that line. If so, there is no reason to take this trajectory as showing the limit of what is *achievable* by 2030, and there is no reason to use it as an estimate for the leftover emissions requiring offsetting. Indeed, this would explain why the figure for offsetting is so

⁹ <https://www.greenbiz.com/article/carbon-offset-prices-set-increase-tenfold-2030>. Prices converted to sterling and rounded to nearest 1,000.

¹⁰ <https://www.bloomberg.com/professional/blog/carbon-offsets-price-may-rise-3000-by-2029-under-tighter-rules/>

shockingly high. **A better method should be sought for modelling organisational emissions reductions that would be able to match the Council’s ambitions.**

The order of inquiry here is clearly back to front. The Council should not set an arbitrary target, based on a “science-based” 2050 trajectory (which is, moreover, only appropriate for the world as a whole, not for a council in a developed country trying to exercise leadership), and *then* investigate its estate with an eye to achieving this. They should investigate their estate with an eye to what level of efficiency is *technically* achievable, and *base their target on that*.

2.6. Strategy/overall delivery approach

There is little wrong with the Strategy’s recognition of the issues, or the broadly stated aims. However, as already shown, the Strategy lacks a proper basis in fact, or proper target-setting for emissions reductions. This contributes to a lack of a sense of clear priorities (see **Section 2.2** above).

There is very little detailed information provided on the financial and human resources that will be required to deliver the proposed actions. There is an emphasis on ensuring that “strategic enablers” such as funding, skills and resources, policy and behaviour change are in place, but the necessary detail is lacking. It is therefore difficult to assess whether the strategy/plans are realistic and the probability of the goals and decarbonisation objectives being achieved. What particular skills are resources are needed, on what scale, at what level of funding, and where will this funding come from?

There are a number of ways in which the Strategy could be improved:

- With regard to the effort required to convert this Strategy into realistic delivery plans, we accept there is considerable uncertainty particularly in relation to funding, but we recommend that the Strategy includes, at least, **a preliminary schedule for developing more detailed action plans.**
- The Strategy should provide a more detailed explanation of how the County plans relate to District and Borough Council plans, and the contributions to be made by the private sector and the community.

- In particular, the Council needs to **ensure it has the necessary expertise** to a) model the carbon emissions reductions from particular projects; and b) to design and secure funding for renewable energy and retrofitting projects, etc.
- We would like to see **cost estimates for definite emissions-reducing projects**, and their comparison to estimates of the level of funding potentially available, from whatever sources. Ideally, such estimates should cover the whole of the Council's own emissions, and those in the County.
- The strategy should include more information about the County's organisation, and the systems and resources proposed to manage the County's own activities, and to monitor and report on activities being undertaken by others. We recommend that a dedicated management programme is assigned and given the resources to undertake this role and to report to a separate assurance body.
- The governance arrangements need to be further defined, particularly in relation to the oversight of progress, reporting arrangements and decision-making.
- Three years between reviews of the strategy is too long and should be at least yearly, and consistent with annual reporting by the Committee for Climate Change and the District Councils for their own Climate Action Plans.

It would be good to see some sort of Pareto analysis to help decide where to prioritise effort. When projects are defined, MACC charts, which allow direct comparison of estimated emissions reductions against lifetime costs, are another useful method, as discussed in Somerset County Council's climate action plan.¹¹

The focus on partnership across institutions is good, and it is positive that the Council has set up a Warwickshire Public Sector Net Zero Group to share best practice.

We are glad to see a commitment to community involvement in the strategy, but the approach that will be taken to this does not seem to have been decided. As mentioned above (**Section 1**), we would suggest that **the Council should set up specialist forums related to each of their six themes**. Each forum could discuss and feed in ideas on how best to engage the community, and to advance and develop the Strategy. Forums

¹¹ <https://docs.somerset.gov.uk/wl/?id=d527h7Pn0sXEUrwD4nh6d6H6Kd3BN9PE>

could be held both in-person and on-line. Warwickshire Climate Alliance and the Low Carbon Warwickshire Network could help advise on the expertise held by local people, and work to invite them, if the Council could provide the administration and hosting.

The consultation contains an Action Plan alongside the main strategy document. This lists the Council's "first phase planned actions to meet our goal of reducing carbon emissions to net zero across the Council by 2030". This suggests the focus is primarily on the Council's own emissions, though these represent only around 0.4% of the emissions in Warwickshire.

The list of actions in the Action Plan should be revised and pruned. It currently contains a lot of items related to further planning and feasibility studies rather than actions that will lead directly to be beneficial outcomes and decarbonisation. There is some padding: for example, "Complete energy efficiency audits and develop decarbonisation plans..." and "Review findings of efficiency audits and develop decarbonisation plans..." do not really merit being listed as separate actions.

2.7. Funding

The discussion lists a number of possible sources of funding, and this is useful. There is no discussion of the Council's current expenditure or assets, but the Council's contracting activity is mentioned as a way to exert influence.

Shortfalls in Council funding, due to years of austerity, are taken as given, and it is therefore concluded that they will have to be made good by the private sector (p. 23). It is probable that some private investors, including local people, would be willing to invest in well-constructed renewable or energy-saving projects, and we agree that the Council should investigate ways to achieve this, and so to increase climate investment.

However, the Council also needs to be **lobbying the government** with the very strong message that achieving Net Zero by 2050 (and in particular, achieving the reductions necessary by 2030) will not be possible without a **very big increase in state expenditure**, i.e. a Green New Deal. The private sector cannot fill this gap, because the abstract and purely quantitative pursuit of monetary profit is a different goal from the more qualitative, concrete goals of protecting and restoring our planetary habitat, and

ensuring the wellbeing of people. The two ends are always liable to mismatch, and the main reason there is a climate and biodiversity crisis is because it has been more profitable to take the atmospheric balance and the natural world as free and disposable than to protect them. For-profit investment seems unlikely to be very interested in such vital decarbonisation efforts as mass insulation, rooftop solar, public transport, or in nature restoration (the clever pricing mechanisms being constructed notwithstanding). This is particularly the case in less affluent areas, where there is little prospect of community fundraising contributing.

We recommend the Council divest its pension fund from fossil fuels. We discuss this in detail in **Appendix 1** below. In addition, the Council **should investigate using a portion of its pension fund as a local green investment fund**. For example, the Lancashire Council Pension Fund has agreed a £100m investment fund for investment in local schemes on a commercial basis.¹²

3. Specific Themes

Delivery of the key objectives (i.e. net zero & biodiversity targets) is said to be based on six delivery themes (or areas of action) with key objectives. These sections are intended to survey previous & current actions, future aims, and, importantly, “the gaps that need to be bridged to meet our objectives” (p. 24).

It is good that Key Performance Indicators will be identified. Performance indicators are identified for each area, though no targets will be set. The main KPI, of course, would have to be carbon emissions, and there are no estimates for the carbon reductions here. However, carbon reductions will depend on the collaboration of multiple agencies, in addition to the Council, so it is important that additional KPIs are identified so the Council can measure its own performance.

In general, there is too great a reliance on signposting to other documents and strategies, mostly in the future. **The Strategy should include links to these documents, where they exist, or timescales for their publication where they do not.**

¹² <https://www.preston.gov.uk/article/1599/Preston-and-Lancashire-City-Deal>

3.1. Transport

Transport accounts for 44% of emissions in the County. Definite plans here extend only to policies for the Council's own transport emissions: the Council will decarbonise its own fleet by switching to alternative fuels & developing a better staff transport plan. A further study has been commissioned to understand the scale of the decarbonisation challenge for the transport sector in Warwickshire. Similarly, the forthcoming Local Transport Plan 4 has been presented as involving a transition to new, sustainable modes of transport.

It is therefore understandable that this section is a bit thin. On the other hand, the Council declared a climate emergency in 2019, and it is disappointing that key questions are still deferred to further studies and plans. When will these be published?

No effort is made here to subdivide transport emissions, although BEIS statistics allow this quite easily. This means that it is not clear if emissions from air flights taken by people within the area are included or not, but the suspicion is that they are not, as these usually do not appear under territorial emissions. It also means no attempt is made to discuss challenges around decarbonisation of particular sources of emissions, e.g. from motorway traffic. Taking this seriously would require the Council to commit to a lobbying strategy, which it does not here.

Regarding emissions within the County, results of some modelling are included that shows the projected impacts of government programs for ULEV introduction. No information on the models used is included. The modelling seems to show:

- a) This will be of little impact by 2030, and will not do much to help reach the Council's target of net zero emissions by 2030.
- b) The bans on petrol/diesel vehicles will, together, reduce transport emissions quite drastically by 2050, leaving only the relatively small sum of 43,400 tCO₂e to be reduced. It is not clear what the source of these residual emissions are. Therefore it is unclear if the suggested solutions might actually help or not.

The figure given for county-wide transport emissions here (somewhere just over 1,200,000 tCO₂) seems to contradict the figure given earlier in the document, where these are said to = 44% of 5,140,000 tCO₂ = 2,261,600 tCO₂. Have motorway emissions been excluded from the modelling? If so, why, as they are undoubtedly within the county, and the Council and local population exert some influence over them.

Modelling does not include impacts from existing programs for modal change. The fact that existing modal change policies have not been modelled means it is unclear whether the policies mentioned here are likely to achieve the necessary reductions or not.

3.2. Energy generation

The Council is considering installing renewable energy on Council buildings and land. There have been installations at one fire station, one care home. ‘Feasibility studies’ have yet to be done for other buildings. The feeling is that this should have been done by now, so the council should not be in the position of presenting targets, plans and feasibility studies as climate actions.

Disappointingly, there is no further strategy for increasing renewable energy provision across the County, beyond completing the remaining 400 Solar Together installations. This section is very thin.

Other councils, including Cambridgeshire, have successfully invested in developing their in-house knowledge around the financing and planning of renewables projects, and now have an Energy Investment Unit.¹³ This building-up of staff capability is a key first step to the planning and delivery of renewable projects that not only drive decarbonisation, but have also been able to provide an additional source of income for the Council. **The Council should follow Cambridgeshire’s strategy for investment in renewables, and ensure it has staff with the specialist expertise needed to undertake detailed investigations of the suitability of Council land and property for the instalment of renewables, and the financial strategies suitable to make this possible.** When the kind of financial strategies adopted in Cambridgeshire and elsewhere are understood,

¹³ <https://www.cambridgeshire.gov.uk/asset-library/cambridgeshire-peterborough-corporate-energy-strategy.pdf>

the Council may need to re-examine its investment criteria to ensure they allow a sufficiently long-term approach so that such opportunities can be taken advantage of.

3.3. The built environment

Again, the general recognition of the problem is correct. It is recognised that heating is a key challenge, and that energy efficiency is important. The graph on p. 39 showing scenario analysis for a trajectory based on current policy is useful (but needs to be better labelled).

The purchase of 100% green electricity is not a useful way of reducing emissions – the purchase of REGOs merely reallocates emissions on paper, so that the Council's emissions decrease, but those of everyone else increase. As such, it has at best a minimal impact on emissions (i.e. only when energy is bought – potentially at a premium – from a bespoke green energy company that invests in new renewable installations).¹⁴ High quality net zero plans do not rely on such measures. For instance, in a company like Apple's net zero strategy, the installation, acquisition, or direct purchase of renewable energy through a PPA takes priority over purchase of certificates. This should be removed from the KPIs on p. 36.

To have “undertaken some initial investigations to understand how we can reduce energy consumption by improving the energy efficiency of our buildings” is not an action impressive enough to merit inclusion here (p. 34).

The Council intends to “[i]nclude emissions and energy performance as a potential consideration when deciding which surplus buildings to divest” (35). This might suggest that the Council intends to sell its least efficient buildings, so as to remove a drag on its own emissions stats. This would, however, either mean the emissions from that building continuing under someone else's ownership, or the Council ceding an opportunity to oversee and guide a process of demolition (which is highly carbon intensive) and development. As such, it would simply transfer emissions from the Council to the County. On the contrary, the Council should target those buildings for development

¹⁴ <https://www.ethicalconsumer.org/energy/do-green-energy-tariffs-make-difference>

through its own instruments, e.g. through the Warwickshire Property and Development Group mentioned here, assuming that is fit for its declared purpose.

Strategies for direct emissions reductions are barely mentioned here, aside from installing LED bulbs in street lamps (a necessary but minor measure). It is recognised that “heating and cooling, particularly from natural gas” is the most difficult issue here, and there is a broad strategy for potentially tackling this issue set out, in very abstract terms, at the end of the section, but no specific plans are mentioned. Existing programs for help with installation or alternative heat sources are not mentioned, and so the question of how to expand them is not even considered. There is no discussion of projects undertaken elsewhere in the UK, which could be imitated or built on.

It might be true that in many cases, such programs could only be introduced in partnership with others, or even under the leadership of others. The emphasis on improving partnerships with District and Borough Councils is reasonable here, for this reason. That should not prevent the Council from considering the problem here, or clarifying to itself what possible solutions might look like. If the Council understands such issues itself, it will be better placed to exercise leadership and influence in its relations with others.

Many of the KPIs indicate that the Council has thought of forms of action that would be useful. Most of the metrics listed here are things that it would definitely be good to improve. However, no targets are given for achievement here, even for those that suggest definite courses of action, such as training programs for businesses and the care sector. To take another example, to set a specific target for “% of staff trained in energy efficiency, capability/knowledge in fitting new technologies and retrofitting” would be a meaningful action, which we would like to see included in the actions listed on p. 35. Again, it feels that the Council has not progressed beyond the drawing board stage here.

The Strategy should specify standards for new Council buildings & retrofits. It is an aim to “Minimise carbon emissions in any new WCC building”. However, neither no specific standards are mentioned in this connection. The “% of new developments/buildings achieving net zero standards” is not in itself a sufficient standard here, as “net zero” might allow offsets: new building undertaken by the Council must not require offsetting. All new buildings must be truly net zero carbon in

use, without offsetting, and this must include **both regulated and unregulated energy**. To achieve this, **all new Council buildings should be built to the Passivhaus standard** – this will get them to zero carbon ready. If they are to the Passivhaus Plus standard (which includes solar panels) they will be zero carbon in use now.

There is no mention of Building performance Evaluation (POE) in the document. For all new developments the 12 months old BS 40101 Building Performance Evaluation must be applied. **All retrofit should be undertaken to the PAS 2035 standard, for domestic buildings, and to PAS 2038 for non-domestic buildings.** PAS needs to be included in the Terminology / definitions.

Something similar applies to net zero support for businesses—specific standards or programs should be stated, and they should not rely on offsets.

The decarbonisation and offsetting targets stated here have the same problems as already discussed in **Section 2.5** above. Most of the actions mentioned involve doing the work needed to develop a decarbonisation strategy, which we would have hoped to discover in this document.

3.4. Resources, waste & circular economy

The Council wants to move beyond the waste hierarchy to pursue circular economy principles within the County and its own practices. This is positive, and the understanding of the circular economy set out here is good. Again, details on concrete plans and delivery schedules are sketchy. There is a lot of talk of educating, encouraging and working with various other actors, but little detail on what is intended. Circular economy initiatives and a Circular Economy Roadmap are mentioned, but this just gives the impression that key work is being postponed for the future.

There is no survey of existing practices, so opportunities for improvement don't become apparent. Could recycling centres be upgraded and improved? How would the idea of a circular economy relate to local industrial and agricultural practices? As recycling used concrete, and other waste products (fly ash, etc) is part of the answer to concrete emissions, this might be usefully addressed here.

3.5. Sustainable communities & green economy

The section begins with a list of principles which one could hardly disagree with, but which could in practice mean several quite different things. If this is “a change from the status quo”, it is not precisely clear how, but it seems to involve at the least recognising the need for restrictions on the pursuit of money for money’s sake, indifferent to impacts on people and planet. We would agree with this. It is certainly good that the Council is interested in working with local community climate groups, such as those represented by Warwickshire Climate Alliance and coordinated by the Low Carbon Warwickshire Network.

There is obviously a big gap between these aims and what existing measures are likely to achieve, but it is unclear how big, as description of existing measures is vague. We hear of existing business support programs that “[s]ome of this support prioritises investment to energy efficiency and low carbon innovation” (46) but we have no idea of how this support does this, how much capacity these support programs potentially support, or what their effects have been in terms of carbon reduction (or any other KPI). This applies also to the other existing programs mentioned.

Discussing community action in the same sections as business transitions is confusing. Different issues arise and different strategies are needed in both instances, and any discussion that shifts from one to the other is unlikely to be helpful. These should be treated separately.

There is no contextualisation of emissions from the various sources of local economic activity. We are told here that around 37% of Warwickshire’s emissions are from industry & commerce (p. 11). There is no survey here of the sources of such emissions. Some of these emissions come from a small number of large scale plants, in specific industries, and there is no focus on the issues these businesses face in decarbonising. No picture is given of the conditions of industry in Warwickshire, or of the technical decarbonisation schedules feasible for such industries. Consequently, there is no targeted focus on reducing the emissions that need to be reduced. Something similar might be said of agricultural emissions and CO₂ sequestration opportunities.

The Eco-Schools program is mentioned, but there is no information on emissions from schools, although this is an area in which WCC has direct involvement.

Regarding the issue of pension fund divestment, see **Appendix 1** below.

3.6. Natural capital and biodiversity

It is recognised that the health of the natural biome is fundamental to the functioning of any economy. The approach being taken is based on the establishment of markets in nature services. This is well underway, and has been since at least 2014. This reflects the strategy undertaken by the national government. We would not ideally favour such an approach, as market approaches are prone to significant unintended consequences and the exploitation of loopholes. The planning of an ‘air quality market’, for instance, implies that someone is to be bribed for not polluting the air, which contravenes the ‘polluter pays’ principle. However, such markets will likely enable projects that will enhance biodiversity and carbon sequestration, and we recognise there is presently little prospect of a change in tack given current government policy and ideology.

The actions cited as already in place seem significant. However, it is acknowledged that a 2008 Biodiversity Strategy is out of date. The Council has a Biodiversity Investment Fund, but details of this (in particular, its size) are not given. Planting of 566,000 trees is planned, and possibly more. A tree nursery is being established to support this. These are positive moves.

An effort is being made to integrate this biodiversity strategy with a carbon market. It seems this will be used to pay for the tree-planting program. It is important that biodiversity credits are not handed out for carbon-polluting activities, so there needs to be some involvement of carbon metrics in the construction of a biodiversity market.

If a local carbon market is set up, it is **imperative** that only carbon **negative** projects be recognised as having the ability to offset actual emissions. From a scientific perspective—which is the only perspective that counts if we are trying to prevent a runaway climate catastrophe—emissions reductions should not reasonably attract a carbon credit. Paying polluting industries to reduce their pollution might sound like a good idea, but this can provide economic support to polluting industries which would

otherwise be economically out-competed and more quickly replaced by cleaner industries.

There are significant monitoring issues with carbon credit schemes. For example, if trees are planted, it is necessary to ensure that they actually survive and grow. If they do not, no carbon will be sequestered, and no credit will be appropriate. We would like to know how local offsets will be accredited and monitored to ensure carbon emissions are actually achieved.

Again, some of the key performance indicators suggest positive activities have been thought of, that are not discussed in the Strategy document, e.g. the purchase and management of land by the Council.

One positive action the Council could take would be to support Warwickshire Wildlife Trust in building carbon accounting into their land management practices as they do not currently have this capacity.

As planning of the transport network is one of the council's key activities, research on the impact of road-building on biodiversity should be recognised in the Strategy. That said, biodiversity considerations should not gainsay the reopening of railway lines or the creation of cycle tracks, where these are necessary in response to the climate emergency.

Appendix 1. Pension Fund Divestment

In the section about investing, on page 25, the "Sustainable Futures" document reads:

"As the Administrating Authority of the Warwickshire Pension Fund, we will be implementing our Investment Strategy for our over 50,000 members, having regard to environmental factors in the operation of the Fund as expressed in Responsible Investment and Climate Risk Strategies. The Fund will consider divestment where engagement does not or cannot work."

The statement, “The Fund will consider divestment where engagement does not or cannot work” needs a great deal more clarification on the following points:

- What are the goals of engagement with fossil fuel producers?
- How do the Fund managers decide when engagement “does not or cannot work”?
- What are the timescales?

“Engagement” with fossil fuel producers is a strategy that is regularly criticised by financial experts, such as in this article in the Financial Times, “Divest fossil fuels: the time for engagement is over” (May 2022).¹⁵ A poll reported in the Financial Times (May 2021) shows that most big investors are extremely sceptical about the big oil companies’ attempts to explain how they are changing their business model.¹⁶

In addition, the briefing from Oil Change International, *Big Oil Reality Check* (May 2022), shows very clearly that no fossil fuel producer has effective plans to protect the environment.¹⁷ In fact, the *Big Oil Reality Check* explains that “no major oil and gas company has yet made a commitment to stop developing new fossil fuel projects.” Nor are future plans any more reassuring, as BP alone expects to spend double the amount on oil and gas projects than on renewables in 2023. This is explained in the Guardian’s article, “BP criticised over plan to spend billions more on fossil fuels than green energy” (December 2022).¹⁸

For the public and members of the pension scheme to judge whether WCC is managing funds appropriately in the face of climate risk, much more information is required. For example:

- What is the carbon footprint of the WCC pension fund each year?

¹⁵ <https://www.ft.com/content/1bb216ee-0647-4d3c-aa17-c3629ab84b80>

¹⁶ <https://www.ft.com/content/fdb34abf-5990-474a-a5c9-6d601ae41826>

¹⁷ <https://priceofoil.org/2022/05/24/big-oil-reality-check-2022/>

¹⁸ <https://www.theguardian.com/business/2022/dec/27/bp-plan-spend-billions-fossil-fuels-green-energy-oil-gas-renewables>

- What advice has been given by the Border to Coast Pension Pool in relation to climate risk, stranded assets and better ways to invest, and can this advice be made public?
- What consideration has been given to decarbonising the benchmarks used by fund managers?
- What are the new investment opportunities that are being pursued in the light of the transition to a low carbon economy?

In relation to decarbonising benchmarks, it would be helpful to consider index providers such as the Financial Times Stock Exchange (FTSE Russell) and the Morgan Stanley Capital International World Index (MSCI) that have launched their own versions of frameworks to reflect the energy transition.¹⁹

Surely the use and selection of **low carbon performance benchmarks** should be included in the Warwickshire pension scheme’s list of “Investment Beliefs”.

Continuing to invest in fossil fuel producers is contrary to the aims of the Sustainable Futures plan. The plan defines the “green economy” as “growth without degrading the environment” (p. 55), but it is clear that greenhouse gases from fossil fuels are causing extreme weather events and economic instability. **The pension fund stands to lose a lot of money in the long term because of the stated desire to “engage”**. The time for negotiation with fossil fuel producers has passed. The pensioners of the future will not thank fund managers for sticking with investments that endanger the very world we inhabit.

¹⁹ See <https://www.ftserussell.com/products/indices/eu-climate-benchmarks> and https://www.msci.com/our-solutions/indices/climate-action-indices?creative=629868121192&keyword=msci%20paris%20aligned%20index&matchtype=p&network=g&device=c&gclid=Cj0KCQiAnsqdBhCGARIsAAyjYjTSYnFXSTWYax5VjMobVtS8ViV__0q6OgJcvsomPKm8kytYVXPfYWAAaAqcXEALw_wcB&gclid=aw.ds.