

Appendix A

SCDC Response to CCC CC & E Strategy 2020 -25 DRAFT

1. We share Cambridgeshire County Council's vision to deliver net zero carbon in our area by 2050 and very much welcome the strategy and commitment to work with partners to deliver it.
2. As an overarching point, it would be helpful if the strategy could be separated out from the (very interesting) descriptive material and presented more concisely.
3. It would be helpful to see the vision translated into a series of objectives outlining the key changes which need to have happened in the county by 2025, (at the end of the five year period of the strategy) in order to be on track to achieve the vision. This would include such matters as, for transport, the proportion of electric vehicles and the extent of modal shift away from use of private cars to public transport, walking and cycling. For housing, the proportion of homes heated other than with fossil fuels and the proportion of homes at various EPC levels. For land use and agriculture, hectares of restored peatland and woodland. We realise this is a work in progress involving many partners, but the clearer the County Council can be about this, the easier it will be to see what the County Council can do to help make these changes happen and what other players, including other layers of government need to do.
4. It would also be helpful to see the figure for annual carbon emissions from the county in 2025 which would indicate that the strategy is on track to deliver the vision.
5. The strategy is for five years but targets 6 and 7 (concerned with collaborating with partners) are for 2030 and 2050 respectively. It would be good to see targets for the end of the strategy period, ie 2025.
6. Governance of the strategy - a clear process for how the strategy and the action plan will be reviewed and further developed would help ensure the strategy serves its purpose.
7. Co-benefits of action on climate change – it would be good to see a prominent mention in the strategy of the many local benefits including improved health, increased social cohesion, economic opportunities and increased resilience.

8. The County Council's influence on countywide carbon emissions through its policies and sector strategies, eg highways, rural estate and health, is arguably the area of its greatest influence and as such it would be good to see this in the strategy as well as in the Action Plan, (where actions are included under Target 5, 'for each Council strategy, identify contributions to both the organisational and wider Cambridgeshire carbon footprints', and 'work with staff, Members, partners and service users to identify how best to manage Climate Change and environmental impacts on sector strategies e.g. highways, rural estate, health').
9. Section 2.2 (Objectives) – It would be good to have something specific about social justice in here. For example, we know that switching to electric forms of heating will initially increase bills for residents. How do we work together to mitigate the impact of this on our more vulnerable residents?
10. Section 3.2 (Current carbon footprints). It would be good to see a mention in this section of the carbon footprint associated with imports of goods and services into the county, and the importance of influencing these even though they don't show up in the county carbon emissions accounts, (and are difficult to measure).
11. Section 3.3 (Priority areas for mitigation within the Council's control). We welcome the identification of nearly zero energy buildings as a key priority in relation to climate change mitigation but consider that this should be supported by a clearer action in the action plan which sets out the construction standards that new buildings will be designed and constructed to in order to achieve this. The current approach of building to BREEAM 'very good' is not compatible with delivering nearly zero energy buildings. BREEAM is not the only methodology which can be used, and we would welcome consideration of other construction methods including trialling Passivhaus, or potentially looking to develop a Bespoke Sustainability Assessment Metric for new public buildings procured by the County Council, as long as there are clear mechanisms in place to monitor performance.
12. Section 3.3 (Priority areas for mitigation within the Council's control). We welcome the references to Afforestation and consideration of peatland but consider that too much emphasis is placed on planting trees without proper consideration as to whether this is an appropriate approach in Cambridgeshire. Parts of Cambridgeshire are very low lying and in some areas are below sea level making them very

vulnerable to future flooding. Woodland may not be appropriate in such locations, and efforts may better be focused on the creation of new wetland environments or re-wetting fenland, which has the capacity for greater carbon storage than woodland and would also deliver wider flood risk reduction and biodiversity enhancement benefits. The planting of trees and woodland is supported, but we need to ensure that the right habitat is being put in the right place, giving consideration to habitats connectivity.

13. Section 4.6 (Priority areas for adaptation through collaboration with partners and our communities), paragraph on water availability – a further priority area should be reducing water use in the County’s building stock (both new and existing), looking at options not just for water efficiency but also water reuse/recycling. To this end we consider that the action plan should include clearer targets for water efficiency that are capable of being monitored – at the moment it just states ‘all buildings to have water saving targets’.
14. Section 4.6 (Priority areas for adaptation through collaboration with partners and our communities) continued... There is also a need to prioritise designing out the risk of overheating in Council buildings – the current reference to adapting the Council’s estate is vague and could lead to adaptation measures that increase energy use and carbon emissions (e.g. air conditioning). For new buildings, this should involve designing out the risk following the cooling hierarchy. For existing buildings, the risk of overheating should be assessed, giving consideration to how buildings could be retrofitted to reduce the risk without having to resort to active cooling. This approach would be in keeping with the National Adaptation Plan which highlights heat in the built environment as one of the key climate risks facing England.
15. Section 5.4 (The Council’s role in conserving and enhancing natural capital). Support for Local Nature Reserves (LNR) is a welcomed. The Council has a statutory obligation as landowner to protect such areas; therefore, any increased ability to do so should be viewed as a positive. However, in terms of delivery of ecosystem services, identifying sites that may be degraded or have potential to provide increased connectivity of services may be a better direction, especially where these lie adjacent or in close proximity to LNRs or other statutory or non-statutory protected areas.

16. Section 5 (Conserving and Enhancing Natural Capital). It would be good to see more detail about the Doubling Nature Vision in this section.
17. Section 6 (Tackling climate change and environmental challenges together) The strategy distinguishes between action to be taken by county and action that requires partnership working. Section 6 includes groups of organisations / sections of the community that County could/should work with – currently this section doesn't reference District level or GCP / CA / NHS etc. We suggest it includes a paragraph about public bodies and makes the point that resources and impact can be maximised by working together.
18. Action Plan – action on developing training courses for all staff and training workshops for Members. We would be interested in finding out more on this with a view to the possibility of providing something similar for our staff and Members.
19. Action Plan, Target 3 (Deliver 20% biodiversity gain across all Council property land projects and wildlife sites). 20% is an ambitious target but not an unattainable one. As with the above comment identifying wildlife sites for 20% net biodiversity gain may not be as simple as it may seem. These sites are already designated for their biodiversity, species assemblages, or habitat mosaics; therefore, increasing biodiversity by a further 20% may not be that simple. As above I would suggest finding non designated sites that are degraded or have potential to provide a greater uplift in biodiversity. This will increase the amount of natural spaces within the county, increase the available biodiversity connectivity, and provide increase support for rare and priority species.