

Appendix G

Feedback on Prioritised Proposals

Page #	Section	Item	Commenter	Comment	Task Force Chair Response to Comments
5	Our Greatest Opportunities to Reduce Emissions: Transport	Move to an alternative fuel source such as HVO (Hydrotreated Vegetable Oil)	Cllr Andrew Mellen	Is HVO environmentally friendly? We need to be clear about the feedstock source for HVO (waste oil = good, palm oil or other edible oils = bad). Supply will need to be from a certified source.	Good question and comment, both raised in TF meeting, strongly agree it must be from a certified source. HVO Fuel meets EN15940 standards & Fuel Quality Directive 2009/30/EC Annex 2. Has a Bio content of 100, Oxygen level of 0, Sulphur Content of <1, Specific Gravity of 0.78, Distillation level, C 200-300, Cetane Level <70, Stability from Oxidation – Excellent, Storage Stability – Excellent, Viscosity (40° mm ² /s) Beesley Fuels
8	1.4 (Renewable and Low Carbon Energy)	We will investigate with our partners, the potential for gas and electricity usage at the Councils' four leisure centres to be moved to certified low carbon tariffs from suppliers of such tariffs who the Carbon Trust recommends as being guaranteed from renewable resources (energy currently purchased by Abbeycroft Leisure and Everyone Active). Make this a prerequisite of any future tender for the service.	Cllr Robert Lindsay	According to the Carbon Trust, many sellers of Renewable Energy Certificates are only moderately reduce carbon and for example, do not produce biogas. They recommend just 3 UK suppliers who have their own biogas https://energysavingtrust.org.uk/home-energy-efficiency/switching-utilities/buying-green-electricity	Agree, any renewable energy supplier should confirm that their sources do not generate energy using live timber imports such as pelletised wood used by Drax.
9	2.3 (Housing)	Seek the resources to assess the environmental performance of our housing stock and determine what additional prioritised actions we are going to take to reduce carbon emissions and contribute to our climate emergency objectives.	Cllr Andrew Mellen	Don't we already know the performance of our housing stock through EPCs?	Housing are seeking to carry assessments of properties as part of the stock condition survey, in order to gain a better understanding of the opportunities for environmental improvements to our stock.

9	2.4 (Housing)	<p>Proposed Housing Strategy revised action: Implement a programme of upgrades to heating systems in council stock, replacing oil systems wherever possible and prioritising heat pumps where appropriate. Ongoing programme. This should be done on a case by case basis, rather than applying to the whole of the council stock as different solutions will be needed. Specific budget will need to be established. Ensure joint working across Suffolk to make use of external funding opportunities.</p>	Cllr Andrew Mellen	Add in "Priority should be given to maximising energy conservation measures (uprating insulation, windows and doors) before work on upgrading heating systems."	<p>The improvement and carbon reduction of housing stock will have to be assessed by following the EPC assessment to determine the most cost-effective path to take to arrive at lowest possible carbon levels. The Housing Team are also looking to incorporate environmental retrofitting measures within the capital programme, in order that they can consider the costs of these measures as part of total capital costs. This package of potential measures can include building fabric improvements, like insulation. As such, they are looking to have a balanced approach to fabric and heating technologies, on a case by case basis, based on what is relevant, effective and affordable. I have been made aware of PAS 2035, which is a standard approach to retrofitting which requires a fabric first approach.</p>
9	2.7 (Housing)	<p>Proposed Housing Strategy revised action: Prepare a broad specification for new build Council stock, to include consideration of passive technologies and measures to increase accessibility, by March 2021.</p>	Cllr Andrew Mellen	Not robust enough. "All new build council homes will be built to zero-carbon standards"	<p>This was not agreed at the Task Force for our own new homes. There is a balance between ensuring environmental measures are included and the ability to build the amount of homes we have committed to.</p>
10	3.2 (Planning)	<p>Analysis of the Suffolk Design Charter to understand implications on the Councils as well as ambition to push further with our own building projects</p>	Philip Isbell	Needs to be clearly committed to across whole Council service areas to achieve consistent exemplar approach not "one off" examples	<p>Yes, agreed. We should be actively engaged in shaping the Design Charter and promoting ways to actively engage developers early.</p>

		to become an exemplar. Agreed that this should be an influencing document across Council service areas rather than an SPD. Further, that early developer engagement should become an action of the team .			We discussed holding developer workshops at one of the meetings.
10	3.3 (Planning)	Through the Joint Local Plan, directly affect new homes to be built over the next 18-20 years to ensure best standards as possible. To include modal shift infrastructure to change behaviour around car use.	Robert Hobbs	Suggest amending to read something like: 'Through the Joint Local Plan, improve the energy and water efficiency of new homes to built over 18-20 years. Require new development to maximise the uptake in sustainable and active travel'.	Agreed - including water efficiency along with this comment.
11	3.4 (Planning)	We will investigate the feasibility of requiring developers to pay into a Carbon Offset Fund for the carbon emissions of all new homes built. We will research best practice from Offset Funds operated by other local authorities.	Cllr Andrew Mellen	We don't need a carbon offset fund for developers to pay into. We just need them to plant, or pay to plant, trees and wildlife areas.	It was agreed there may be a place for Carbon Offsetting in the long term. For now we support focus on planting and retaining trees, hedges and wildlife areas
11	3.5 (Planning)	We will, through the provision of pre-application advice and decision making on planning applications, promote and ensure development is to be fully resilient to the future impacts of climate change in order to minimise vulnerability of people and property.	Philip Isbel	Adds in pre-app. This proposal will be almost impossible to prove that we will "ensure". How can we be certain about "fully"? Who defines? High political risk which won't be properly underpinned by policy until JLP in place. Makes no allowance for planning balance where other priorities e.g. affordables, removal of bad neighbour uses, viability etc, must be weighed up.	Comment supported. I support the inclusion of pre-application advice and believe this can be delivered through improved local validation lists and a biodiversity focussed SPD . Viability needs to account for climate change and perhaps the mechanism for assessing it needs to be reviewed.

11	3.8 (Planning)	<p>We will encourage a sustainable pattern of development supported by low carbon transport infrastructure by ensuring:</p> <ul style="list-style-type: none"> • 100% of development proposals that are expected to, or likely to have a major impact on the highway infrastructure, incorporate a travel plan, in accordance with County/National Guidance. • 100% of all development proposals incorporate, where appropriate, provision for walking, cycling (including storage) and public transport, linkages to networks and electric vehicle charging. 	Robert Hobbs	Suggest removing 100% as the wording implies this.	<p>Agree with removal of numeric percentages, generally they are not meaningful in this context. All development proposals that are expected to, or likely to have a major impact on the highway infrastructure, incorporate a travel plan, in accordance with County/National Guidance.</p> <p>All development proposals incorporate, where appropriate, provision for walking, cycling (including storage) and public transport, linkages to networks and electric vehicle charging.</p>
11	3.8 (Planning)	100% of development proposals that are expected to, or likely to have a major impact on the highway infrastructure, incorporate a travel plan, in accordance with County/National Guidance.	Cllr Andrew Mellen	Development should only occur where provision exists for walking, cycling and public transport rather than dependence on the private car. Travel plans are not a substitute for this.	Remove reference to 100%, see above. Agree that travel plans have not shown themselves to be very useful tools to promote modal shift, but do NOT agree that development be limited as suggested as this would preclude most rural development and any changes in response to COVID. Infrastructure is dependent on the revenue created by development and house building.
11	3.9 (Planning)	We will explore a Local Plan policy which seeks to ensure new developments minimise climate change vulnerability and provides	Robert Hobbs	The Local Plan policies should be read as a whole. Would be better to say to embed climate change in the Local Plan	Agree totally with Rob and why Neighbourhood plans are so important because they link it all up.

		resilience to impacts arising from climate change subject to evidence, feasibility, viability, consultation, and examination.		rather than one specific policy. Covered in the final highlighted paragraph.	
12	3.10 (Planning)	We will explore the potential through planning policy for making retrofitting of existing private building stock easier, especially in areas with fuel poverty (taking into account heritage considerations).	Robert Hobbs	It is not possible for planning policy to deal with retrofitting and consequential gain is covered by Building Regulations. Could the Action Plan be clearer on what is meant by the term retrofitting in this statement? E.g. do you mean planning policy ensures buildings are more flexible and adaptable to changes in technology over time.	Agreed – suggest removal of this point as a previous point covers retrofit.
12	4.2 (Waste and Fleet)	We will investigate opportunities to develop waste-to-energy schemes, including diverting food and horticultural waste to anaerobic digestion - linked to above a treatment option for collected Food Waste required for Suffolk.	Cllr Andrew Mellen	We should consider building our own AD facility – possibly could run waste freighters on biogas?	The SWP is leading on our response to the Gov consultation on food waste, household waste collection and treatment does not score well under life cycle assessment. A Suffolk wide approach is needed per SWP. An aspiration for 2030 onwards but alongside more quick fixes
13	4.4 (Waste and Fleet)	Minimisation and reduction of Organic Waste and green waste: Community composting initiatives, proposed building up the number of community compost experts and wildlife garden experts promoting food waste and green waste into the narrative for local people, review ways to stimulate the public to reduce and home compost organic waste and green waste.	Cllr Robert Lindsay	Woody material can be piled in a corner of a garden to create desperately needed habitat for bees, butterflies, beetles, hedgehogs, amphibians, reptiles. Thus reducing green waste bin contents.	Yes agree, this could be part of our messaging to the public. Feasible if you have a very large garden, not realistic in an urban environment.

13	4.5 (Waste and Fleet)	Ongoing – Waste Minimisation and Recycling initiatives supporting the reduction in residual waste and increased recycling	Cllr Andrew Mellen	Information and education campaign to substantially reduce overall household waste production and increase recycling	Yes, as above. Agree we need to shift focus to avoiding waste generation. This is the work of the SWP. Cllrs can also deliver the message to their Parish/Town Councils as a start, FoodSavvy to increase recycling.
13	4.6 (Waste and Fleet)	We will secure the transition of Council fleet vehicles to electric or other zero carbon fuel sources. Produce a feasibility study including a costed proposal, for using low carbon fuel in the Refuse Collection fleet in place of diesel (as an interim measure prior to full replacement with electric or renewable fuel vehicles). All Euro 6 standard vehicles have the ability to use alternative fuel without the need to retrofit.	Cllr Andrew Mellen	HVO fuel can only be an interim measure and must be from a certified source (see previous comment above)	This was spoken about in detail at the Task Force as HVO being an interim measure while the technology for waste vehicles improves.
14	4.10 (Waste and Fleet)	We will investigate the consumption of single use plastics within Council offices and buildings and develop a plan to reduce and phase out usage.	Cllr Andrew Mellen	Change “investigate” to “eliminate”	Investigate to determine how much of it there is and then eliminate subject to any contract in place
14	5.1 (Transport and Travel)	We will review the Councils’ existing parking policies to encourage a modal shift in transport from cars to alternative options.	Cllr Andrew Mellen	New proposal: Any increase in parking charges to be ringfenced and used to support initiatives encouraging/enabling walking/cycling/public transport	This would have to be looked at against the Council’s overall budget position.
15	5.5 (Transport and Travel)	Investigate the opportunity to use s106 to ensure sufficient infrastructure for cycling and walking. Update cycling strategy so that it maps and prioritises key cycle routes through the district, so that grants and	Cllr Robert Lindsay	We will not be able to get cash out of developers towards cycle routes, if we haven’t already got identified routes. There is a “cycling propensity tool” which allows us to see the maximum potential switch from cars to cycles for any particular route.	Cycle and walking routes are infrastructure. They require planning before instated and maintenance once done. Both CIL and s106 will be investigated.

		s106 money are more easily obtainable.			
16	6.6 (Council and Commercial Estate)	A management approach to secure long-term survival of trees and reduces need to cut down mature trees. Also, a management approach to town verges/grassland between trees to reduce pesticide spraying and mowing which will reduce harm to trees and increase biodiversity	Cllr Robert Lindsay	Spraying and over mowing up to trees can fatally weaken them. Even oaks have their roots very near the surface for a long distance so essential to have a lighter maintenance regime for grassland around them.	Agree that long term care of trees should be part of our estate management strategy.
17	8.2 (Business and Communities)	We will continue to support and promote the Suffolk LAs' 'BEE Anglia' programme offering free energy and environmental audits and consultancy to SMEs, together with a grants scheme for implementing energy efficiency and renewable generation measures.	Cllr Robert Lindsay	This could come from the proposed development Offset Fund, mentioned above, if said fund is run by us and set aside for local use only.	This would be looked at if the Fund is set up.
17	8.6 (Business and Communities)	We will work with local businesses to build resilience to climate impacts. We will assess the risks that climatic events pose and the opportunities available to prepare and respond, including: <ul style="list-style-type: none"> Working with the Local Enterprise Partnership to put adaptation at the centre of local plans for local economic development. 	Cllr Andrew Mellen	Current LEP policies for transport and business are not compliant with either BMSDC or Central Government climate commitments – need to lobby for changes	We need to be in step with the NALEP. It is by working together that we can instigate change enable the change and enable to adapt.
18	8.7 (Business and Communities)	We will work with local communities to build resilience to climate impacts. We will assess the risks that climatic events pose and the opportunities available to prepare and respond, including:	Cllr Andrew Mellen	Need to include heat stress here as a climate factor – it kills far more people than flooding	All climate change risks will be taken into account when looking at those communities at risk.

		<ul style="list-style-type: none"> Identifying communities at greatest risk from climate change (particularly flooding) and developing appropriate actions. 			
18	8.10 (Business and Communities)	We will continue the Councils' membership of the Suffolk Climate Change Partnership and actively participate in and promote its work and remit, including the production and implementation of the wider-Suffolk Climate Emergency Action Plan.	Cllr Andrew Mellen	Championing this requires a cabinet-level lead to take responsibility for our engagement and implementation	There are two Cabinet leads - Cllr Fleming and Cllr Malvisi
19	NEW POINT PROPOSED 9 (Culture Change and Governance)	We will appoint a cabinet member for Climate Emergency to ensure the proposals are implemented	Cllr Robert Lindsay	High level councillor engagement in this will be vital in order to encourage and enthuse and enable rapid change.	As above.
19	NEW POINT PROPOSED 9 (Culture Change and Governance)	A report on progress towards zero carbon 2030 will be laid before full council at least annually for council to debate and vote on.	Cllr Robert Lindsay	Councillor AND PUBLIC engagement will be vital to encourage and motivate progress, to widen support for measures and encourage new ideas for improvement.	The Council's have an agreed corporate output to increase democratic engagement. Agree that the Public should be more involved.
19	9.1 (Culture Change and Governance)	We will incorporate an environmental impact assessment in the Councils' reporting process for key Cabinet decisions including carbon emissions, climate adaptation and resilience and biodiversity and ensure that negative impacts are avoided or mitigated.	Cllr Andrew Mellen	To achieve our goal of being carbon neutral by 2030	Agreed.
19	9.3 (Culture Change and Governance)	We will use guidance for ethical investments as part of our decisions for Council investments, such as Treasury Management and the Companies.	Cllr Andrew Mellen	This must include divesting from any bonds, funds or other investments in the fossil-fuel industry	The 'fossil fuel industry' is likely to play a key role in decarbonising society, also investments are made to maximise returns for the council – we should be circumspect about

					this – take into account where possible but not rigidly so.
20	Performance Management	The monitoring of this action plan will form part of the existing performance framework at Babergh and Mid Suffolk District Councils:	Cllr Andrew Mellen	Carbon budget and reporting to be included alongside financial reporting to Council	OK – under discussion
20	Performance Management	1) Performance Indicators will be developed to be included on the quarterly performance report	Cllr Andrew Mellen	These to track progress over the ten years to 2030, annual reporting will show whether we are on track	It is difficult to set an annual target over a 10 year period, when we currently do not know what will be available to us as a solution. The first set of proposals cover a two year period. This will be reviewed regularly.
20	NEW POINT PROPOSED Performance Management	5) A report on progress towards zero carbon 2030 will be laid before full council at least annually for council to debate and vote on.	Cllr Robert Lindsay	Councillor AND PUBLIC engagement will be vital to encourage and motivate progress, to widen support for measures and encourage new ideas for improvement.	Point covered above.

Additional Comments

Below are additional comments that have been received. These have been covered within the Cabinet Report:

Cllr Mellen	<ul style="list-style-type: none"> The document is focused on the Council’s own carbon emissions, but we must look beyond this at the Council’s leadership role in our communities – where we can encourage/enable/support efforts by businesses and residents in Mid-Suffolk and Babergh to reduce their own carbon footprint (These emissions are far more than the Councils’). We should promote and support community energy schemes which would see increased installation of renewable electricity generation, firstly, by supporting the Local Electricity Bill. We could not see on the V6 document that the council were prepared to support and advocate for the Local Electricity Bill which was something we felt they had resolved to do during the meeting. One aspect of climate change that will cause us considerably more harm in Suffolk and East Anglia is drought and water shortages (as we are currently experiencing). Can we require council homes and new builds to be fitted with rainwater collection and storage systems? Council-owned amenities such as Mid-Suffolk Leisure Centre and Needham Lake need upgrades to their cycling storage facilities - to sheltered cycle storage with potential for charging cycle batteries.
-------------	--

	<ul style="list-style-type: none"> • Provide public bins for recyclable waste in towns. This is being done in other towns and cities in the UK and is standard in much of Europe, so why not here • Providing electrical charging points at taxi ranks must be a priority – the current idea doing a feasibility study is too open-ended and there needs to be stronger resolve to get taxis electrified. • Funding for walking and cycling infrastructure must be negotiated with developers before S106 agreements are finalised. • Encourage the establishment of green burial sites to promote tree planting and affordable green burials.
Cllr Pratt	<ul style="list-style-type: none"> • Promote and Support community energy schemes which would see the promotion of renewables, firstly, by supporting the Local Electricity Bill. I could not see on the V6 document that the council were prepared to support and advocate the Local Electricity Bill which was something I felt was resolved to do during the meeting. • One aspect of climate change that will cause us considerably more harm in Suffolk and East Anglia is drought and water shortages. I am not sure if the water aspect had been discussed in the Climate meetings? Could we investigate the possibility for council homes and new builds to be fitted with water collection and retention systems? I noted that you did look at greywater schemes but are there other ideas and water saving schemes we could have our officers investigate? • The Mid-Suffolk Leisure Centre and other council-owned amenities like Needham Lake upgrade to their cycling storage facilities to sheltered cycle storage with potential for charging electric bicycle batteries. • Provide public bins for recyclable waste in towns. This is being done in other towns and cities in the UK so why not here? • Electrifying the taxi ranks as well as providing incentives based on licencing. • Funding for walking and cycling infrastructure must be negotiated with developers before S106 agreements are finalised. • Create a municipal green burial site to promote tree planting and affordable green burials. Eye Town Council have a scheme in place.