



**Friends of
the Earth**

East Dorset Group

**Dorset Climate and Ecological
Emergency Strategy
Draft for Consultation**



**Comments submitted by
East Dorset Friends of the Earth**

Introduction

We welcome the Report by Dorset Council. In particular, we consider that the analysis of the linked Climate and Ecological Emergencies is very realistic, in its appraisal of the challenges facing the County, and, indeed the Country. We also note the strong and consistent message provided in the Report provided by the public consultation in December 2019/January 2020: **“Your Ideas”**. However, we have concluded that the proposed Action Points would not provide a sufficient response to the issues identified in the Report, nor to the public demand for action.

- a. The Draft Strategy rightly emphasises that Dorset faces two linked crises. The key word is EMERGENCIES: Climate Change and an Ecological Crisis.
- b. The Strategy is correct in stating that, if the 1.5°C warming target is to be reached, we have less than 10 years to reduce emissions to a sufficient level. As is pointed out, 1.5°C warming **“would lead to catastrophic impacts to health, livelihoods, food security, water supply, human security, and economic growth”** (p11). However, greenhouse gas emissions are still rising globally; it is estimated that we need to reduce emissions by 7.6% every year until 2030, to achieve the 1.5°C ceiling for global heating ¹. It is not clear how the achievement of **“net zero greenhouse gases by 2050”** (p.16) is relevant to the urgent need to reduce emissions by 55% by 2030. If that can be achieved, it will be possible to achieve ZERO CARBON EMISSIONS well before 2050! As the December 2020 report of the UK Climate Change Committee notes ², we need to achieve **“a reduction in UK greenhouse gas emissions of 78% by 2035 relative to 1990, a 63% reduction from 2019.”**
- c. As it stands, the action plan lacks targets and dates. Given the scale and urgency of the action required, it is frustrating that it has already taken a year to get to this stage! Challenging targets are required now, which focus action on what needs to be done by 2030 and 2035! A Strategy Review in 2025 would enable Dorset to measure progress and set new targets for 2035 and 2050, against the evolving scientific evidence base.
- d. The outline approach identified on p.6 rightly distinguishes 3 areas for action. However, we would question the use of the term **“Indirect action”**. As we argue below, the operation of transport and land use policies, in particular, is **directly** within the remit of the Council. In order to tackle the Climate and Ecological crises, the Council must design all of its strategies and policies, in these and other areas, around the central requirements of addressing climate and ecological targets. Given the recommendations of the December 2020 Sixth Carbon Budget Report, it is clear that we need to move faster than previously envisaged, but that this can be achieved relatively cheaply, with huge benefits for job creation, quality of housing stock, public health, and ultimately poverty relief.
- e. Priority targets must address both of the following criteria:
 1. Areas within the direct influence of Council policy which can be implemented rapidly (say within 5 years)
 2. Areas within the direct influence of Council policy which will have the biggest impact on emissions.

- f. A separate strategy element is needed to deal with those areas which can only be addressed by Central Government – ie through legislation or fiscal policy. This should focus on lobbying local MPs, the LGA, organisations representing business and community interests – the LEP, LNP, local CBI, Chambers of Commerce, NFU, etc. – and, of course, Central Government Ministers. This should include suggested target dates and budgets required.
- g. Thirdly, there needs to be a comprehensive communication strategy, to help both the general public and key stakeholders come to terms with the benefits and opportunities provided by a concerted and rapid transition to a Zero Carbon Dorset. This will require a major effort by the Council to take public opinion with them, including a much better targeted process of both public consultation and education. Approaches should include energy advice, training for trades, and education for farmers (eg. leading by example using the Council’s own estate).

Relying on traditional “public consultation” methods - detailed reports and arcane feedback processes - will be insufficient. In particular, it will be necessary to increase the transparency of the processes by which public responses are evaluated and incorporated into policy. Those who have been involved for decades in the traditional consultation process frequently express the view that responses have little impact, and that final policies bear a very close similarity to the “consultation” drafts. Many people have never been engaged in these activities - having little awareness of consultations, little time to devote to reading long documents, and unfamiliarity with jargon and acronyms. As we note below, this Report’s response to the first public consultation has been less than whole-hearted.

- h. There is a need to distinguish more clearly between 4 aspects of the response:
 1. Measures to protect, conserve and restore natural systems (ecosystems, rivers and drainage systems, coasts and marine environments, air quality).
 2. Measures to reduce emissions of greenhouse gases (not just CO₂, but Methane, NO_x and CFC’s).
 3. Measures which can reduce the impact of emissions – this means carbon absorption, capture and storage, (sequestration)
 4. Measures to mitigate the impact of global heating – public health strategy, flood reduction (including land use changes), coastal protection.

This list is presented in order of importance for impact, and hence the order in which they should be prioritised within the CEE policy, both for spending and timescale for implementation of changes.

Key Action Points

1. Measures to protect, conserve and restore natural systems (ecosystems, rivers and drainage systems, coasts and marine environments, air quality).

The way in which the Council frames and implements it’s Planning Policies is the most important mechanism under its control for reducing the ecological crisis. Examples of inadequate policies would be the Heathlands SDP, which gives insufficient priority to preserving and **enhancing** heathland over any other form of development. Very strict policies to protect SSSI’s, AONBs, RAMSAR sites and other

specifically protected habitats and species are required – ie. a strong presumption against development that does not both increase ecological stability and reduce greenhouse gas emissions. This will require a more balanced interpretation of the National Planning Policy Framework. The Council needs to be prepared to defend its stance against more “flexible” interpretations of NPPF from Ministers and the Planning Inspectorate.

2. Measures to reduce emissions of greenhouse gases (not just CO₂, but Methane, NO_x and CFC's).

The most effective ways to reduce greenhouse gas emissions are to move away from fossil fuels – especially for transport, electricity generation and farming (not just for machinery, but reducing artificial fertilizer and pesticide inputs). For individuals, living without a car, avoiding flying, and reducing meat consumption have the greatest impact³. Clearly, in a rural area such as Dorset, reducing car use is more difficult - other efforts to reduce transport impact (efficient electric cars, or even better, major use of hydrogen or electric powered mass transport) should be priorities. So too should using renewable energy and eating a predominantly plant-based diet. The Council needs to avoid any new road building and airport expansion, and to invest in rail, bus and tram systems. Formal policies should be adopted to oppose new or expanded fossil fuel extraction in the County, (mainly gas and oil, including fracking). The Council must divest from fossil fuel investments with immediate effect. Planning policies which encourage solar, wind, wave and tidal power are needed⁴. Large offshore wind power (and potentially sea-bed tidal power), together with comprehensive solar farms using existing urban roof-space should be encouraged, linked to local battery storage and hydrogen conversion technologies. Higher building standards are essential to achieve high energy efficiency, with solar power, heat pumps and community energy production to be expected in all new build, and in any approvals of plans to upgrade of existing building stock. Reducing the need to travel should be the primary consideration in considering location of new housing, employment and leisure development and in redevelopment of existing towns and villages.

3. Measures which can reduce the impact of emissions – this means carbon absorption, capture and storage.

Schemes for carbon capture should prioritise tree planting, and farming which encourages carbon capture (permanent pasture) as against ploughed land. The latter releases stored soil carbon, uses artificial fertilizers and pesticides (which release greenhouse gases), and also leads to soil erosion, reduced water retention in aquifers, and increased flooding. Technology-based carbon capture is likely to be less effective and more costly, and should only be viewed as a last resort. Where cheap, efficient solutions are available, the Council should actively encourage innovative industries in carbon capture, e.g. farming algae, biochar creation.

4. Measures to mitigate the impact of global heating – public health strategy, flood reduction (including land use changes), coastal protection.

Global heating raises threats to public health. In the UK, the main threats are heat deaths, and diseases caused by the spread of novel pests and vectors, as the climate warms⁵. Increased precipitation and storms, and coastal erosion, are starting to

occur due to changing weather patterns, and will require costly remedial action. It will be far cheaper to reduce global heating in the first case ². Rising sea-levels, will exacerbate coastal erosion and flooding. However, land use patterns – mainly agricultural practices and building on flood plains - are also a factor. Loss of tree cover, replacing soil with hard surfaces (including domestic gardens, car parks and roads), farming practices (soil compaction by machinery, erosion due to ploughing of slopes, excessive water abstraction} all alter run-off patterns and increase flood risks.

The Draft Strategy recognises many of these factors, and has identified some of the solutions available to it. More solutions have been submitted by the public (see **Ideas** section, pp. 61-64). Unfortunately, the resulting Action Points suggest an over-cautious approach, a lack of urgency, and a failure to set challenging (SMART) targets. The following comments consider these weaknesses in more detail.

CARBON EMISSIONS & ACHIEVING NET ZERO

The Report identifies two key areas in which progress to date has been inadequate: transport and agriculture, (p. 18). However, it concludes ***“Dorset Council only has control over the carbon emissions produced from its operations and this will be a key focus of our initial programme”*** (p.22). It is difficult to see how the Council, as the Planning and Transport Authority for the area, can justify such a statement. It is the policies adopted by previous authorities in relation to land use, transport and other policies (tourism, minerals extraction, waste management) that are responsible for the growth in traffic, tourism impact, and many of the rural land-use practices which are the cause of static or rising levels of greenhouse gas emissions. Waste disposal in land fill or through incineration has implications for additional greenhouse gas emissions. At present priority appears to be given to mineral extraction (especially sand and gravel), over recycling of building materials and reduced usage. This results in destruction and degradation of habitats, with consequences for carbon release and reduced capture.

CARBON BUDGETS: PATHWAYS & TRAJECTORIES

The Sixth Carbon Budget ² shows that it is possible to identify the key areas for action, and to set strong, time-bound targets for reducing emissions. These need to be translated into specific targets for Dorset. It also needs to be recognised that the UK has much higher per capita emission levels than many countries, and so we shall need to go deeper in cutting emissions. Fortunately, as the CCC Report shows, this is likely to be less expensive than previously thought, and to have revenue-saving benefits, especially in the areas of health, energy poverty and reducing unemployment ⁶.

Eight Key Themes:

[\(Comments in blue cross-refer to suggestions contained in the Ideas section, pp. 61-64\)](#)

1 RENEWABLE ENERGY

We do not consider that biomass (p.26) should be regarded as a major area for renewable energy. Given the need to increase agricultural productivity, whilst reducing the use of fossil fuel derived inputs, biomass waste will be required to provide organic soil inputs, and should not be used for energy. (In most cases it is difficult to use biomass without adding to greenhouse gas emissions!).

Whilst we welcome proposals for more solar farms and onshore wind generation, this should be balanced against the need for more local food production and conservation of Dorset's natural assets (including for tourism – which can be expected to grow with the rise of post-Covid “staycations”). Hence there is need to prioritise solar rooftop generation, ground-source and air-source heat pumps (with implications for building standards) and community energy schemes. Offshore wind and tidal will be needed to provide bulk generation, probably supplemented by hydrogen plants (to store excess electricity and to manage electricity supplies in peak demand).

[Installing solar PV on the roofs of all Council owned buildings, the introduction of grant schemes to help residents install solar PV on domestic properties and incentivising solar installation through reduced Business Rates; other renewable technologies wind, tidal, heat-pumps, hydro, wave, anaerobic digestion, and multi-measure approaches; the Navitus Bay offshore wind farm plan to be re-visited.]

2 BUILDINGS

The prime focus of planning needs to be to reduce the need to travel (and to accommodate the growth in home working). This requires a much closer integration of new development with transport planning: growth in height and density of housing, rather than sprawl; redevelopment of town centres into multi-use zones (housing, work and entertainment); and greater focus on neighbourhood services (principally in Weymouth). As we have already suggested, higher buildings standards will need to be a key feature of Local Plans. [Tighter restrictions on developers; prioritisation of brownfield sites for development; making sure all new buildings are built with solar panels and EV charge points]

3 FOOD & DRINK

Given that Dorset is a rural County, and that 10-12% of emissions come from agriculture, the Council must seek innovative ways to encourage changes in farming practices. Though encouragement of local, sustainable food production is a vital first step, more fundamental changes in rural land management will be required. Although the future shape of the planning system is in a state of flux, the Council must show leadership, both through radical changes to rural planning principles, and through strengthening protections to natural systems. The latter are vital for carbon capture and storage, groundwater and soil conservation, reducing runoff and flood risk, land stabilising (especially along coasts), and maintenance of healthy food chains which support natural predators of food crop pests. Through public education and engagement, the Council can promote solutions such as permaculture, organic farming and local food production. Engagement with the farming community and landowners to actively promote regenerative agriculture and land management that actively absorbs carbon and nitrogen is an essential part of any strategy. The Council must also ensure protection and expansion of community gardens and allotments through its planning and other policies. [a reduction in the use of harmful pesticides and herbicides]

4 ECONOMY

The Sixth Carbon Budget Report of the Committee on Climate Change ² makes it clear that a shift to a Zero Carbon future can be cheaper than previously estimated. It would generate potentially huge carbon savings, create hundreds of thousands of new jobs, and ultimately save huge amounts on energy bills and the costs of the NHS. The Report also stresses the need to ensure that the costs and benefits of these changes are distributed fairly (p.7). The Policies Report also stresses the importance of effective

public engagement pp. 31-32). We would refer the Council to our recent submission to the LEP for an outline of how a greener and fairer economy can be fostered in the post-Covid, post-Brexit context ⁶.

5 WASTE

The biggest single component of household waste is now packaging materials, much of it single-use and unnecessary plastic, (or plastic-contaminated card and other recyclables). [\[an increase in recycling facilities, clearer instructions on what and how to recycle, and the adoption of a circular waste economy in Dorset.\]](#)

Plastic packaging is not just a waste problem, with significant costs for Council Tax payers, but also a major source of environmental contamination, risks to wildlife and to human health. (See our recent report: **Plastics – how green is your supermarket?** ⁷). The Council should establish a Plastics Forum, with supermarkets, business representatives and environmental groups, to identify ways to reduce unnecessary packaging, especially plastics.

6 WATER

Once again, The Council's Planning and Transportation policies can play a crucial role. For example, reducing the need to travel will reduce pollution from car tyres and brakes (now a major concern for its impact on ecosystems and on human health). Rigorously protecting natural systems, especially wetlands and water meadows, can help to conserve and replenish groundwater resources, reduce runoff (erosion and flooding), contributing to enhanced water quality. Tree planting to replace marginal farmland can reduce agri-chemical runoff, eutrophication and poor water quality, whilst simultaneously increasing natural carbon capture.

7 NATURAL ASSETS

Again, the Climate and Ecological Emergencies require that this takes priority over development in all designated or protected areas. This will require tougher and more consistent planning controls. It will also be assisted by reversing the growth in private transport, and a shift to active tourism and leisure, (ie. based on walking, cycling and linked public transport). An example of the inadequacy of current policies is provided by the Heathlands SPD. As we pointed out in our submission to the consultation on this, *"protection of existing heathlands must override other considerations"* ⁸. On the positive side, the potential for the growth of eco-tourism in Dorset is considerable. This can help to boost employment and rural businesses; it can also generate Council income towards conservation and re-wilding projects, whilst simultaneously stimulating greater public understanding of the need to preserve and enhance our natural assets.

[\[Tree planting schemes - the Council to plant more trees and support others to do the same; re-wilding schemes - the need for this approach to be reflected in wider policy making and planning decisions; an increase in environmental protections; changes in greenspace management; stopping developers from felling mature trees \]](#)

8 TRANSPORT

The Council is aware of many of the areas where it needs to act to **reduce the need to travel**. However, its proposed actions are weak in two areas:

- i. It ignores the use of restrictive measures: parking charges and prohibition, Clean Air Zones (including bans on diesel delivery vehicles in residential areas), traffic management measures such as pedestrianisation, one-way streets and no-

through roads, segregated cycleways, for example. [improvements to be made to the County's footpaths and cycleways, and investment in bus and rail services; increase in EV charging points, and increased traffic control measures; increasing park and ride schemes, introducing car-free days in towns, using parking charges to discourage unnecessary car journeys, and introducing no-idling zones]

- ii. Land-use policies which reduce the need to travel, such as promotion of live-work housing units (long a feature in Devon), and rejuvenation of villages and small towns, with improved local services, mass transport and encouragement of micro-businesses. Again, this will need to be accompanied by restrictive policies towards growth in major towns (of peripheral growth of housing, shops and businesses).

Charging networks and Hydrogen supplies are investments the Council could encourage and facilitate in the short and long-term.

Conclusion.

The Draft Strategy shows a welcome recognition of the severity and importance of the Climate and Ecological Emergency. There is an awareness of the nature of the problems, and of the broad components of the Actions needed to tackle the crisis,

However, the focus on Direct Actions is likely to have an insignificant impact – Council Activities account for less than 2% of emissions in the County (pp. 18-20). The Strategy severely underestimates the scope for influencing changes in emissions through its policies, particularly in relation to land-use planning and transportation. Hence, what we would like to see is a more radical re-appraisal of the scope for influencing change:

1. Through a review of all policy areas, to prioritise action on the Climate and Ecological Emergency;
2. An expanded Communication and Engagement Strategy, aimed at local businesses and the public. This should be a two-way process of ideas exchange.
3. A concerted effort to encourage Central Government to create the legislative and financial environment within which the Council can proceed faster towards the mutually agreed goals of sustainability, public health, a fairer society, and a more prosperous Dorset.

**East Dorset Friends of the Earth
December 2020**

Notes:

- ¹ “..we now must deliver deep cuts to emissions - 7.6% each year... If we don't do this, the 1.5C goal will be out of reach before 2030,” UNEP Executive Director, Inger Andersen (26/11/19).
- ² The Sixth Carbon Budget: The UK's Path to Net Zero, Committee on Climate Change, December 2020, see also Policies for the Sixth Carbon Budget and Net Zero, Committee on Climate Change, December 2020.
- ³ 2017, K. Nicholas and S. Wynes, Lund University, Sweden cited in: <https://www.newscientist.com/article/mg24833080-800-the-population-debate-are-there-too-many-people-on-the-planet/#ixzz6fTgbvdee> .
- ⁴ “production of coal, oil and gas must fall by 6% a year until 2030 to keep global heating under the 1.5C target agreed in the Paris accord and avoid “severe climate disruption”.
But nations are planning production increases of 2% a year and G20 countries are giving 50% more coronavirus recovery funding to fossil fuels than to clean energy. Ivetta Gerasimchuk, at the International Institute for Sustainable Development. <https://www.theguardian.com/environment/2020/dec/02/world-is-doubling-down-on-fossil-fuels-despite-climate-crisis-un-report>. Accessed 02/12/20.
- ⁵ “in the second week of August, deaths from covid-19 had reached the lowest weekly levels for five months. the spike in deaths that occurred that week – 9392 deaths in total, 447 more than the previous week – was **probably due to a heatwave rather than the coronavirus.**” <https://www.newscientist.com/article/mg24833040-100-we-must-pay-attention-to-subtle-yet-deadly-aspects-of-climate-change/#ixzz6fTmM94nt>
- ⁶ Contribution to the Dorset Investment Prospectus, (Local Enterprise Partnership), East Dorset Friends of the Earth, October 2020.
- ⁷ “Plastics – how green is your supermarket? Supermarket Plastics Survey 2020”: A Report by East Dorset Friends of the Earth, November 2020.
- ⁸ The Dorset Heathlands Planning Framework 2020-2025: Comments Submitted by East Dorset Friends of the Earth, January 2020.