

1. Supplement to the agenda for

Cabinet

Thursday 21 May 2026

2.30 pm

**Conference Room 1 - Herefordshire Council, Plough Lane
Offices, Hereford, HR4 0LE**

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7. CARBON MANAGEMENT PLAN 2026/27-2030/31	3 - 52
<p>To approve the council's new Carbon Management Plan (CMP) which sets out the council's approach to reducing carbon emissions for the period 2026/27 to 2030/31.</p>	



Title of report: Carbon Management Plan 2026/27-2030/31

Meeting: Cabinet

Meeting date: Thursday 21 May 2026

Cabinet member: Councillor Swinglehurst, Culture and Environment

Report by: Corporate Director, Economy and Environment

Report author: Energy Resilience Officer

Classification

Open

Decision type

Key

This is a key decision because it is likely to be significant having regard to: the strategic nature of the decision; and / or whether the outcome will have an impact, for better or worse, on the amenity of the community or quality of service provided by the authority to a significant number of people living or working in the locality (two or more wards) affected.

Notice has been served in accordance with Part 3, Section 9 (Publicity in Connection with Key Decisions) of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012.

Wards affected

(All Wards);

Purpose

To approve the council's new Carbon Management Plan (CMP) which sets out the council's approach to reducing carbon emissions for the period 2026/27 to 2030/31. The plan is focussed on the council's own operations, and will enable the council to deliver energy efficiencies, increased resilience and potential financial savings.

Recommendation(s)

That:

- a) **The Carbon Management Plan 2026/27 – 2030/31 is approved.**

Alternative options

1. Do not adopt the CMP and proceed without any guiding document to deliver continued emissions reduction from 2026/27 onwards. This would be contrary to the ongoing approach taken by the council to deliver energy efficiencies and reduce carbon emissions by 2030.

Key considerations

2. The Herefordshire Council Plan 2024-28 identifies reducing carbon emissions and achieving related efficiency and savings as a priority, The Carbon Management Plan is a key enabler towards this objective. Target benefits include:
 - a. Improving the energy efficiency of buildings to reduce council expenditure and secure energy resilience
 - b. Installing appropriate renewable energy technology to reduce council energy use, deliver savings and support local industry and employment
 - c. Increased use of renewable energy where appropriate to support energy and business resilience of the organisation, reducing reliance on price-volatile imported fuel supply, and delivering long-term savings
 - d. Maximising potential for reduced air pollution to improve public health, particularly older population with respiratory illnesses and younger children.

The Carbon Management Plan (CMP) sets out Herefordshire Council's approach and the actions required to achieve these objectives via energy efficiency and emissions reduction. The majority of UK local authorities have some form of CMP.

3. Herefordshire Council produced its first CMP in 2011 covering a 5-year period and this will be the fourth CMP. Previous plans have been revised and updated at the end of each period to produce the next plan and ensure continuous progress. The third CMP covered 2020/21 to 2025/26 and this revised, fourth plan presented for adoption began development in early 2025. This was guided by a Cabinet Task & Finish group which met between January and May 2025.
4. The plan identifies emissions sources and the actions required to reduce or eliminate carbon emissions and improve energy efficiency. Collectively, enough suitable actions are identified to achieve and potentially exceed the stated target for the council to no longer be a net source of carbon emissions after 2030/31.
5. The plans have enabled the council to deliver significant progress on carbon emission reduction and to achieve financial efficiencies and environmental benefits. Carbon emissions in the 24/25 year were 63.5% lower than the 2008/09 baseline¹.
6. The proposed fourth CMP identifies actions that further reduce council carbon emissions, improve energy efficiency and resilience, support cost reduction and deliver emissions 'offset'.

¹ This figure refers to the revised emissions boundary for future reporting as set out in the CMP.

Community impact

7. Local government has a clear leadership role in demonstrating and delivering on energy efficiency, organisational and community energy resilience, and other benefits clearly derived from carbon reduction. The council's work can help inform, involve and engage businesses and residents across the county, and is supported by the council's business support services, for example advice and signposting to specialist support on energy efficiency and cost savings.
8. External factors such as 'energy shocks' caused by global instability, fuel price volatility and scientifically-evidenced impacts of climate change have a detrimental impact across Herefordshire's residents, environment and local economy in common with all parts of the UK.
9. Reductions in carbon emissions through reduced use of fossil fuels, and switch to renewable sources, supports improved energy resilience, price-stability and potential long-term cost-savings, public health benefits including associated health and care costs from respiratory illnesses and long-term impact on young children through poor air quality.
10. The CMP and its subsequent delivery are a key driver to the council's objectives to deliver improved energy efficiency, resilience, and further associated economic and organisational sustainability, cost control/reduction and other benefits.

Environmental impact

11. Delivery of the CMP will contribute positively to the environment through reducing carbon emissions and limiting environmental impacts of energy use.
12. Reducing fossil fuel emissions contributes to improving local air quality and therefore public health.

Equality duty

13. The Public Sector Equality Duty requires the council to consider how it can positively contribute to the advancement of equality and good relations, and demonstrate that it is paying 'due regard' in our decision making in the design of policies and in the delivery of services.
14. The mandatory equality impact screening checklist has been completed for this decision, and it has been found to have no impact for equality.
15. Evidence indicates that some emissions reduction measures can unintentionally deepen inequality but also recognises that impacts of climate change disproportionately harms existing marginalised groups. Future delivery of actions will require equality duty screening.

Resource implications

16. The plan includes outline cost estimates for each action.
17. Business cases are not included, as these will be required when funding and delivery opportunities are realised throughout the plan period.
18. All future actions within the plan will require the appropriate governance.

- 19. Some actions may be eligible for grant funding, should these funding sources become available. The council has previously secured funds for decarbonisation works which have been instrumental in the development of a sound business case.
- 20. Subject to approval of project funding and inclusion in the capital programme and revenue budget, activity identified in the CMP Action Plan may deliver potential revenue savings and generate additional income and return on investment for the council.
- 21. No impact on ICT, human resources or property has been identified.

Legal implications

- 22. There are no specific implications within this report.
- 23. The relevant legal provisions for this decision can be found in the council’s constitution, www.herefordshire.gov.uk/constitution.

Risk management

Risk / opportunity	Mitigation
Reputational risk arising from the lack of a credible plan to reduce energy costs, achieve a balanced energy portfolio, increase energy resilience against supply and price volatility and by delivering significant carbon reduction by end of financial years 2030-31.	The carbon management plan outlines a credible route to achieve the councils energy use objectives. Local Authorities’ published plans are regularly examined by various campaign groups etc.
Failure to maximise opportunities to achieve emissions reduction.	The plan identifies where action on emissions can be delivered across the council and where further opportunities exist.
Failure to identify and pursue future external funding opportunities to deliver improved energy performance and carbon emission reduction.	Future funding for public sector bodies is unclear, but the CMP incorporates an ongoing proactive approach to identification of external funding using a clear data-driven approach and understanding of opportunities for efficiencies to reduce carbon emissions.
Failure to improve energy efficiency results in increased risk to unexpected price rises adding pressure to in-year budgets.	Reduced overall energy consumption and shift to electricity through the strategic and proactive CMP helps improve resilience and minimise the risk of supply-side shocks and resulting price volatility, therefore reducing risk of unexpected financial pressures.

24. Risks will be managed at service level and escalated as required.
25. The council's annual carbon emissions are a performance indicator within Economy & Environment.

Consultees

26. PGC was undertaken on Monday 23rd March 2026, was recorded and is available to view.
27. A written response from the Independents 4 Herefordshire group was received and is attached as Appendix 3.

Appendices

- 1 - Aiming for 2030: Herefordshire Council Carbon Management Plan 2026/27 – 2030/31
- 2 – Equality duty checklist for CMP
- 3 – i4H response to PGC

Background papers

None.

Glossary of terms, abbreviations and acronyms used in this report

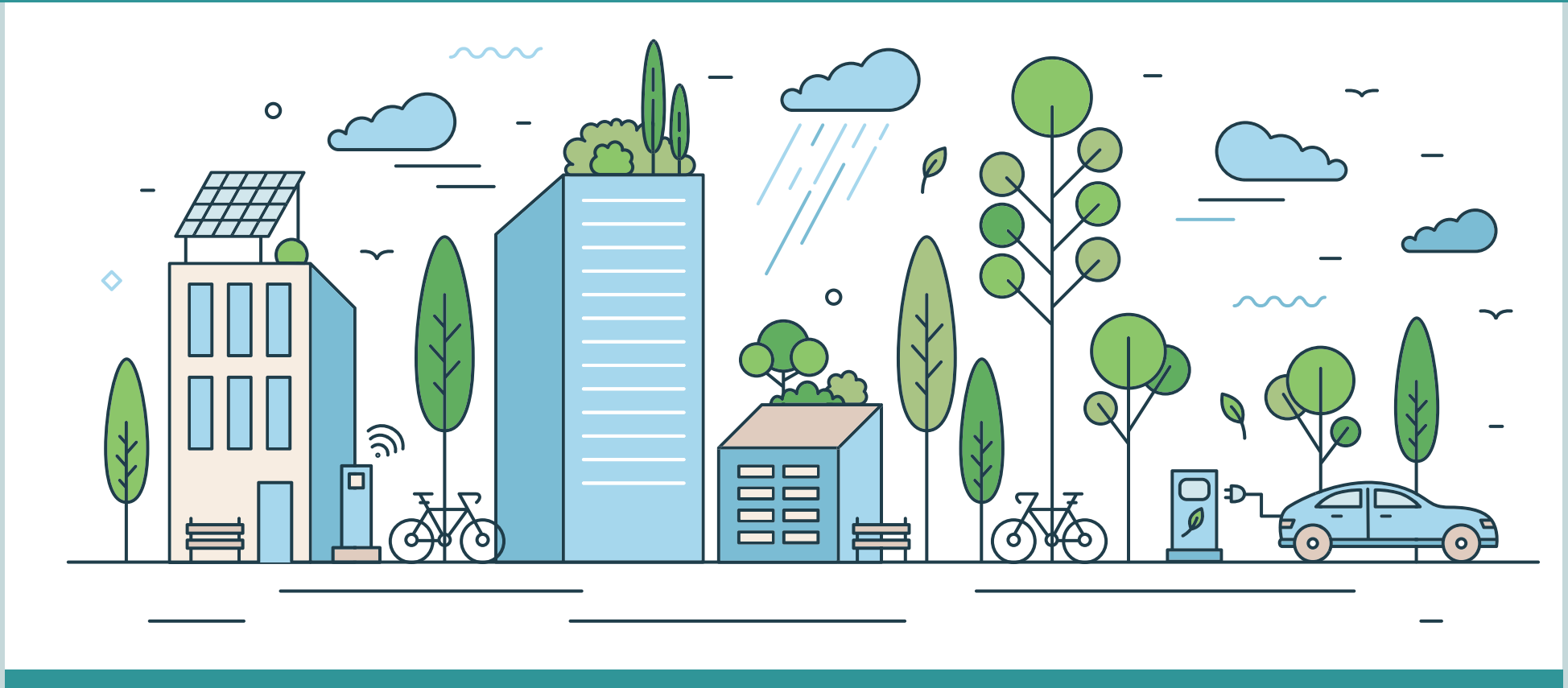
CMP – Carbon Management Plan

Carbon neutrality – the point at which an organisations emissions less any emissions offset are equal to zero.

Offsetting - this is the process of removing emissions directly from the environment or reducing emissions sources that are outside of the councils' own operations. The reduction in these emissions is counted as an equivalent reduction in the councils own emissions.

Aiming for 2030:

Herefordshire Council Carbon Management Plan 2026/27-2030/31



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Executive summary

Herefordshire Council has made significant progress in reducing its carbon emissions from operational activity. The 2024/25 figures demonstrate a 64% reduction from the 2008/09 baseline. This Carbon Management Plan details a continuation of this work for 2026/27 to 2030/31 and sets out how the council can continue to reduce its emissions, and achieve further savings by the end of this period.

This plan supports the Herefordshire Council Plan 2024-28 priorities and aims to reduce carbon emissions and achieve improved energy efficiency, energy resilience and costs savings. The Carbon Management Plan is a key enabler towards these goals. Target benefits include:

- Improving the energy efficiency of buildings to reduce council expenditure and secure energy resilience.
- Increased use of renewable energy where appropriate to support energy and business resilience of the organisation, reducing reliance on price-volatile imported fuel supply, and delivering long-term savings.
- Maximising potential for reduced air pollution to improve public health, particularly older population with respiratory conditions, and younger children.

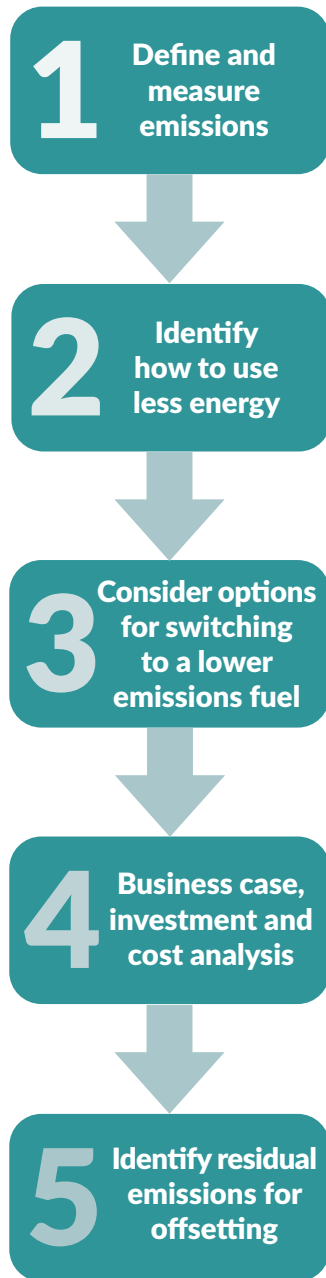
The 2024/25 figures show total emissions of 5,357 tonnes of carbon dioxide equivalent (tCO₂e). Significant contributors to these emissions include:

- Waste Collection: 1,255.8 tCO₂e
- Commuting & Homeworking: 957.6 tCO₂e
- Gas use in Council buildings: 705.3 tCO₂e
- Public Realm Contract: 610.3 tCO₂e
- Council Fleet: 108.4 tCO₂e

The plan explores opportunities to further reduce carbon emissions while delivering high quality services across a large rural area. It also sets how the established reporting procedures are used to track the council's emissions.



A five step process has been used to identify and develop actions that will reduce emissions:



The actions outlined in sections 4 and 5 specifically identify ways to reduce emissions and include an estimate of the associated costs. The plan draws together actions from across the council, its employees and contractors. Actual delivery will depend on more detailed feasibility appraisal, project design and development of specific business cases.

Some significant operational changes are expected over the period of this plan and the potential impact of these are outlined. This includes anticipated changes to the Public Realm which will give the council additional control over the associated emissions.

The council has limited control over some carbon emissions sources and those emissions likely to remain by 2030/31 have been estimated. The council's residual emissions can be considered for offsetting to deliver its goals by 2030/31. Potential offsetting routes include exported electricity from rooftop solar installed on council buildings.



Solar panels on the roof of the Herefordshire Archive and Records Centre



1. Introduction

Herefordshire Council is aiming to deliver significant benefits through this Carbon Management Plan including increased energy efficiency and resilience, cost reduction, air quality and environmental improvements.

Energy market instability in recent years has caused supply challenges and price volatility. The council has an ongoing need to secure the best value for local people, and within its clear ambitions to improve the environment and make Herefordshire the best possible place to live, work, visit and invest.

Action to reduce carbon emissions will continue to deliver energy, cost management and environmental benefits.

National policy context is also relevant to Herefordshire Council's ambition for carbon reduction:

- **2008:** the UK Parliament enact the Climate Change Act, a legally binding framework for action on climate change including reduction of greenhouse gas (GHG) emissions.
- **November 2024:** at the United Nations Framework Convention on Climate Change (UNFCCC) conference of parties (COP29) the UK announce an updated Nationally Determined Contribution to reduce economy wide emissions by at least 81% compared to 1990 levels.

This carbon management plan focuses on how Herefordshire Council will contribute to key local goals and wider national objectives by 2030.

Relevant legislation and documents include:

- [The future is green: the economic opportunities brought by the UK's net zero economy](#), February 2025 - a report from the Confederation of British Industry (CBI).
- [What Is Climate Change?](#) - United Nations
- [Climate Change Act 2008](#)
- [Agenda item - NOTICES OF MOTION UNDER STANDING ORDERS](#) - Herefordshire Council
- [UK's 2035 Nationally Determined Contribution \(NDC\) emissions reduction target under the Paris Agreement](#) - GOV.UK

This plan:

- Details the source and quantity of emissions
- Describes how the emissions can be reduced
- Identifies opportunities and challenges for delivering emissions reduction
- Outlines those actions that deliver emissions reduction and estimates associated costs

1.1 Council targets

This Carbon Management Plan will guide the council's reduction in emissions, by the end of the 2030/31 financial year. This plan does not apply to emissions produced across all of Herefordshire. The council's own emissions are less than 1% of the county total.

1.2 Rationale for emissions reduction

Reducing carbon emissions supports council priorities and the recognised need to manage energy usage, efficiency and costs, while increasing supply options and thus long-term sustainability and resilience. In addition, there are other factors that support action on emissions:



Air quality is the largest risk to public health in the UK¹ and a major contributor is exhaust emissions from burning fossil fuels. Emissions reduction has a public health benefit and reduces the cost to the NHS of treating related illnesses. The estimated cost in 2017² was £42.88m.



Investment in emission reduction stimulates local economic activity. Improving the energy efficiency of existing buildings and installing small-scale renewable energy solutions supports skilled trades including electricians, heating engineers, builders and suppliers of these materials.

¹Health matters: air pollution - GOV.UK

²Estimation of costs to the NHS and social care due to the health impacts of air pollution: summary report



1.3 The Herefordshire Council Plan 2024-28

The Herefordshire Council Plan³ sets out how the council will deliver its services and its priorities for the county between 2024-28. This is organised into four themes: People, Place, Growth and Transformation.

The Place theme aims to “protect and enhance our environment and ensure that Herefordshire remains a great place to live”.

This Carbon Management Plan sets out how the council will reduce its own emissions and progress towards delivering its Council Plan and ongoing efficiency priorities.



The Transformation theme states that “We are on a transformation journey to be a sustainable, modern and fit for the future council”.

One of the six priorities of the Transformation theme is to “Change and transform the organisation to be fit for the future and work efficiently”. This Carbon Management Plan contributes towards this priority by addressing the council’s energy consumption and working practices to lower emissions and improve efficiency.

³The Herefordshire Council Plan 2024-28

2. Council emissions

The council consumes energy to operate the buildings and vehicles required to deliver the services it provides. The type of energy and how much is used determines the quantity of emissions.

2.1 Emissions reporting

Reporting follows the principles of the international standard, the Greenhouse Gas (GHG) Protocol and began in 2008/09 providing a baseline year from which to measure progress.

The purpose of emissions reporting is to:



Reporting informs both delivery and monitoring of this Carbon Management Plan.

The GHG Protocol categorises emissions as being within one of three Scopes:

Scope 1: Direct fuel use in council buildings and vehicles e.g. gas boilers or diesel vans

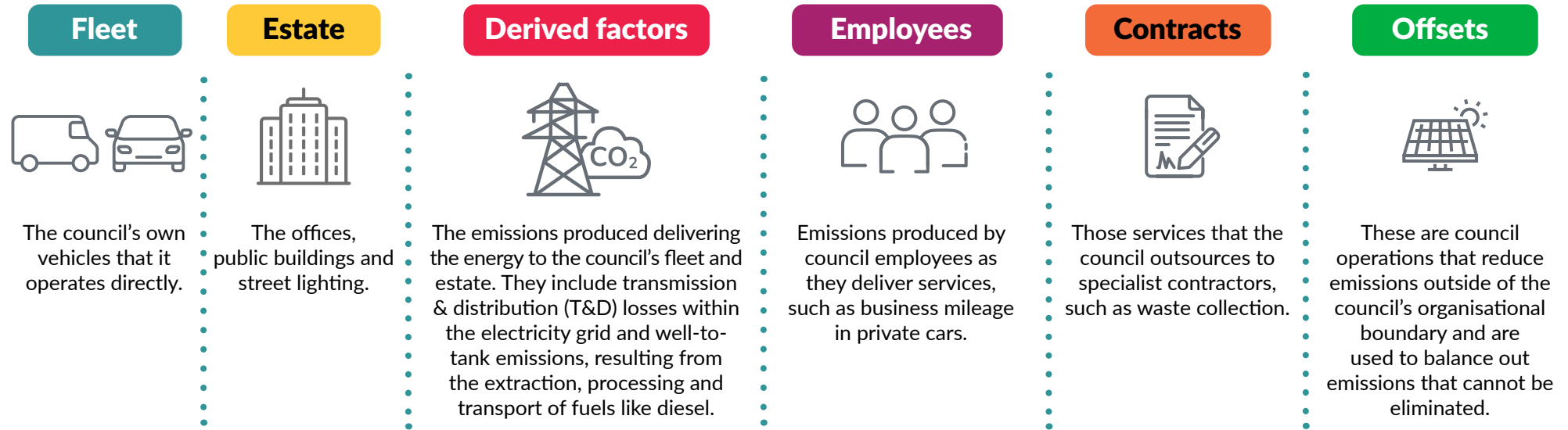
Scope 2: Emissions from imported energy.
For the council this is electricity only and is supplied from renewable sources

Scope 3: Emission sources outside of the council's direct control but essential to the council's service delivery. This includes emissions from employee travel and (scope 1 & 2) emissions of delivery partners such as FCC Environment who collect household waste



2.2 Organisational boundary

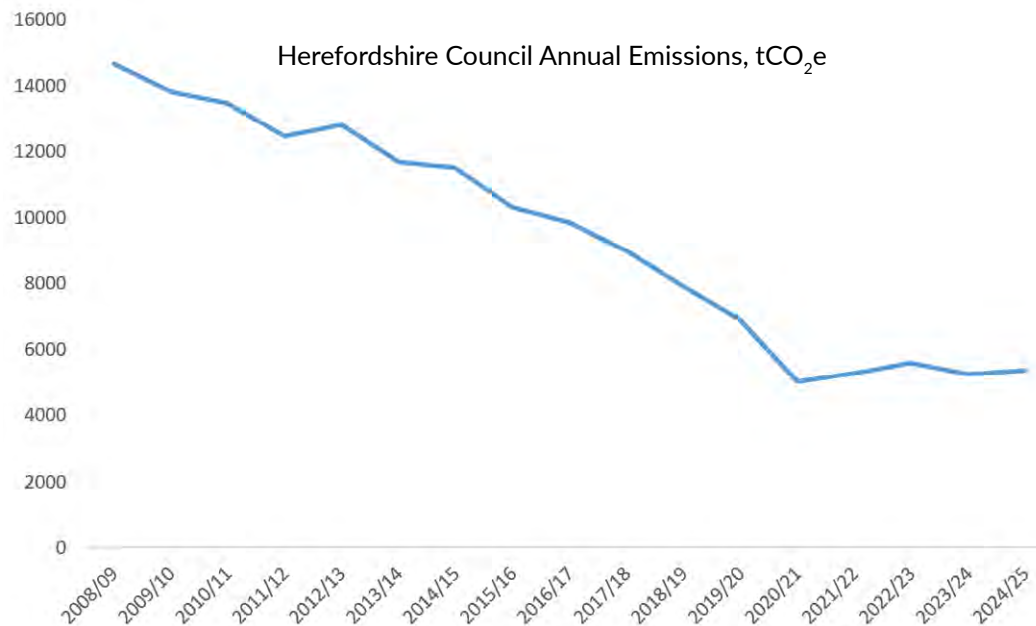
The 'organisational boundary' specifically outlines the emissions sources included in reporting. As the purpose of reporting is to drive change, the boundary has been defined based on where the council has control to deliver reductions. Herefordshire Council's operational boundary includes:



2.3 Emissions in 2024/25

The council's emissions in 2024/25 were 5,357 tCO₂e. This is a 64% reduction from the 2008/09 baseline. This does not include any offset.

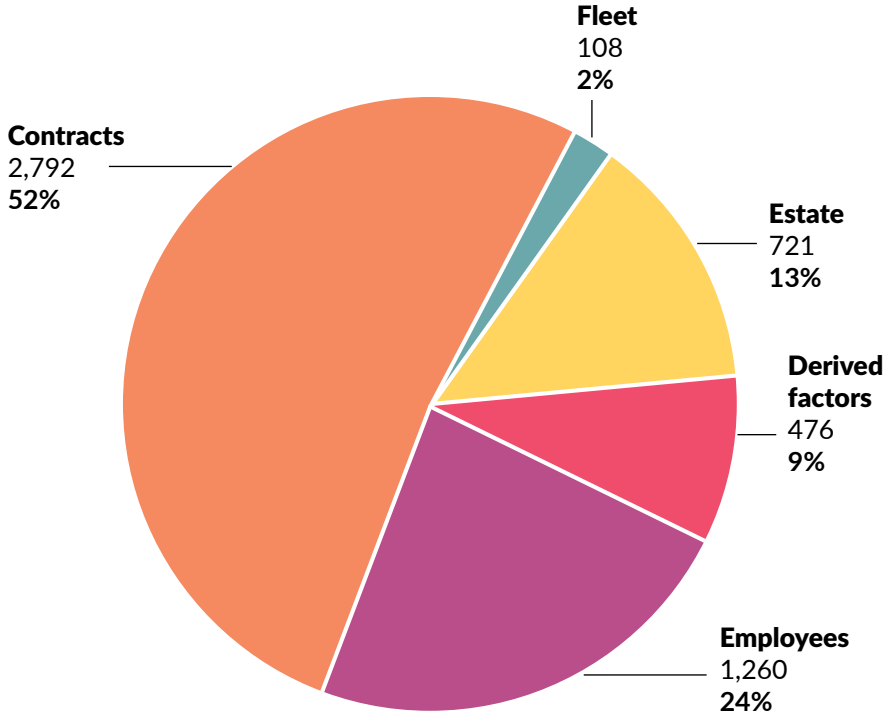
Technical details of the emissions reporting and baseline calculations form Appendix I.



2024/25 emissions by group, source and scope

Group	Scope	Source	Tonnes CO2e	% of Total
Fleet	1	Council fleet	108.4	2.0%
Estate	1	Buildings - gas	705.3	13.2%
	2	Buildings - electricity	8.1	0.2%
	2	Street lighting	0.0	0.0%
	3	Buildings - Water & sewerage	7.5	0.1%
Derived factors	3	Transmission & Distribution - Buildings	58.8	1.1%
	3	Transmission & Distribution - Street lighting	30.6	0.6%
	3	Well To Tank WTT	386.8	7.2%
Employees	3	Business miles	301.9	5.6%
	3	Commuting & Homeworking	957.6	17.9%
Contracts	3	Public Realm Contract	610.3	11.4%
	3	Waste Collection	1,255.8	23.4%
	3	Waste Transfer	926.1	17.3%
All		TOTAL EMISSIONS	5,357.2	100.0%

2024/25 Emissions, tCO₂e % of total



OFFSET	Solar PV generation	-88.7	-1.66%
	Hereford Beryl Bike	-12	-0.23%
	County retrofit delivery	0*	0.00%
	Biochar production	0*	0.00%
NET EMISSIONS		5,256.5	98.1%

*Potential future projects - no contribution to baseline figures

3. Delivering carbon emissions reduction

3.1 Identifying and developing actions

Actions have been developed using the following 5 stage process:

1. Define and measure emissions

This information is included in the annual emissions reporting.

2. Identify how to use less energy

A technological solution such as more efficient appliances or an operational solution such as eliminating duplicate journeys or matching heating times to when a building is occupied.

3. Consider options for switching to a lower emissions fuel

This usually means diversifying the energy mix and increasing use of electricity, eg. replacing a gas boiler with a heat pump, or a diesel van with an electric van.

4. Business case, investment and cost analysis

The cost of implementing the change is considered against any savings made each year when compared to operating the original. For example, the cost of buying an electric van and running it compared to replacing and running a diesel van.

None of the actions identified in this plan have detailed business cases prepared.

5. Identify residual emissions for offsetting

It is important to identify those emissions that will remain. These will need additional actions to reduce further or be offset.

3.2 Opportunities

We will maximise the benefits of achieving the emissions reduction target through a planned and agile approach. Opportunities include:

Targeted

When a source of emissions is identified, specific measures will be considered, costed and implemented.

Refurbishment and renovation

Buildings require ongoing maintenance and upgrading to remain fit for purpose. By including energy efficiency improvements as part of the schedule of planned building maintenance work, the costs of the improvements can be significantly reduced.

End of life replacement

Vehicles and appliances have a limited lifespan. Anticipating and planning for vehicle or appliance replacement creates an opportunity to consider lower emissions alternatives.

Contract design

When contracts require renewal or revision there is an opportunity to embed emissions reduction. Emissions monitoring should also form part of the contract.

New services and service reviews

When services are designed or reviewed an evaluation of any buildings and travel requirements can identify opportunities to minimise energy use, cost and emissions.

Funding

Funding opportunities can prompt investment in emissions reduction. Prior preparation is required as application windows can be short.



3.3 Challenges

As emissions continue to reduce, further measures and associated derived benefits can become more marginal and difficult to address. These challenges can be overcome and there will always be a need to balance effective service delivery and emissions reduction.

Challenges include:



Technical limitations

There are limits to what technological solutions can deliver. Existing buildings can only be improved so far and even high efficiency heating systems still require significant energy.



Control limitations

The council has limited control over its scope 3 emissions. Employee emissions are collectively significant but individually small and are a result of where employees live, how often they commute and what car they own. Where control is limited, innovation and engagement can create opportunities for progress.



Availability of solutions

Global decarbonisation is driving innovation. Large markets have choice and availability of products, such as solar panels or electric cars. Specialised solutions, such as large heat pumps and electric bin lorries have more limited availability. This creates a delivery challenge but one that can be expected to ease over time.



Operational requirements

Providing services across a rural county necessarily requires a lot of travel and a lot of fuel. Efficiency gains and low emissions fuels are both required in these instances.

3.4 External Drivers

Some factors outside of the council's control drive emissions reduction whilst other factors make reduction more expensive or difficult. Understanding the impact of these drivers will inform decision making.



Efficiency gains

Appliances and vehicles have become more efficient over time and so modernisation almost always improves efficiency.



Fuel changes

Petrol and diesel include a proportion of biofuel mixed in with fossil sources. This has the potential to change again in future, further lowering emissions. Manufacturers shifting to electric vehicle production may make this unnecessary. Price volatility including significant shocks can be reduced through increased energy resilience.



Energy prices

Higher energy costs improve business cases for investment in energy reduction. Energy price volatility is a financial risk and reducing demand for energy mitigates this risk.



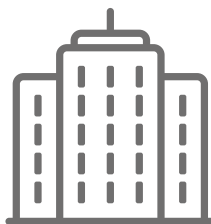
Technology costs

Cost of electric vehicles, solar panels, batteries and heat pumps are all expected to fall. Tariffs and taxation can also impact cost.



Government policy

A significant driver is the policy direction of the UK Government. Minimum efficiency standards, taxation, grants, regulation and other tools can all facilitate emissions reduction. Long term stability in overall policy direction supports UK delivery of emissions reduction.



4. Areas of work

Actions are grouped into the following sections based on the emissions reporting and delivery mechanism.

1. Governance
2. Council fleet
3. Council estate
4. Derived factors
5. Employees
6. Contracts
7. Offset

4.1 Governance

The UK Government has committed to meeting international emissions targets. No specific duties, targets or powers have been placed upon local authorities to contribute to this national ambition. However, councils have declared local targets and developed emissions reduction plans and strategies for their operations.

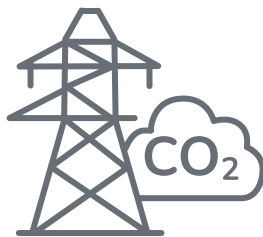
4.2 Council Fleet

The fleet comprises of cars and vans allocated to teams alongside a pool of cars available to all employees for business travel. Future changes in the public realm and school transport contracts are expected to increase fleet size.

A comprehensive review of the management and operation of the current fleet was carried out in 2025 which concluded that electric vehicle (EV) options were suitable for operational needs. Driver training and effective fleet management have also been identified as delivering emissions and cost savings. Additional EV charging infrastructure will be required to support further fleet transition. Where the chargers are co-located with solar panels there are opportunities for cost saving.

4.3 Council Estate

This includes offices, museums, libraries, community centres, public conveniences, commercial units and the county street lighting inventory. Most of the estate has been assessed and energy saving opportunities identified. These have been considered alongside boiler age, repair needs and planned maintenance to create a work programme of building improvements.



Buildings – gas: Most of the estate emissions are from natural gas used in heating. Continued efficiency gains and building fabric improvements will reduce consumption, though there are limits to how far a building can be improved.

It is possible to secure a supply contract for low emissions biogas. While this does have an additional cost, the emissions reduction is significant.

Buildings – electricity: Emissions are low because the electricity the council uses is certified renewable electricity. Further reductions in consumption will reduce running costs and can be delivered through continued improvement of building services, lighting and appliances. Additional solar generation reduces the need to import electricity from the grid and there are opportunities to maximise use of generated electricity such as electric vehicle charging.

Water and sewerage: Water and sewerage emissions can be limited by continued good practice in water saving and prompt leak repairs. Technical solutions such as timer controls are required in locations such as public conveniences.

Street lighting: This includes illuminated signs, traffic lights and street lighting. Upgrading to LED lamps is now complete. The street lighting inventory is expected to increase as the road network develops and so overall electricity consumption can be expected to rise. Emissions will remain very low as they are supplied by certified renewable electricity. Only the Transmission & Distribution (T&D) losses and Well-To-Tank sources produce emissions (see below).

4.4 Derived factors

The derived factors cover the emissions produced when delivering energy to its point of use. Reducing the quantity of fuel used and switching to lower emissions fuel sources reduce these emissions. Derived factors are calculated from the scope 1 and scope 2 fuels used in the council's estate and fleet. Derived factors from scope 3 emissions are outside of the reporting boundary.

Transmissions & Distribution (T&D) Losses: These emissions result from the energy lost within the electricity network of cables and substations. Even though the council uses certified renewable electricity, the T&D losses are not covered by this certification. Reducing electricity demand results in a corresponding drop in the T&D emissions.

Actions that switch the council's energy demand from gas and diesel to electricity will result in increased emissions from T&D losses. These have been included in estimations and are significantly less than those from the fossil fuels no longer used.

Well-to-Tank (WTT) emissions: Well-to-Tank emissions are produced during the extraction, production, processing, and delivery of fuels. Shifting to lower emissions energy sources and reducing the amount of fuel used reduces Well-to-Tank emissions.



4.5 Employees

Some emissions produced by employees are within the council's emissions boundary. The council has limited control over the following emissions sources:

Business miles: Employees use their own vehicles for a range of council purposes. The travel required depends on service needs and the location of employees and service users. The vehicles used by employees are outside of the council's control. However, there are alternatives and these should be accessible to employees and suited to service needs. Increased use of the council's own zero or low emissions fleet can reduce business miles, emissions and cost. Emissions can also be reduced by increased usage of public transport, choosing active travel options and by car sharing.

Homeworking: Homeworking is part of the regular working pattern for many employees. Emissions are based on the estimated hourly energy use and the number of hours worked from home. Homeworking links directly to commuting as working patterns shift from one to the other. The emissions per hour figure used to estimate the homeworking emissions was produced in 2020. When this is revised it can be expected to be a lower emissions figure.

Commuting: Commuting emissions are included as they are result of the operational requirements of the council. Direct influence of an employee's commuting choices is limited but there are opportunities to encourage and enable lower emissions options. Baseline emission figures used data from the employee survey in 2023. Future surveys are an opportunity to improve data collection and gain further insight into reduction opportunities.

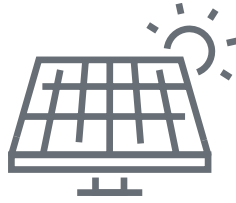
4.6 Contracts

Countywide waste collection and transfer contracts: This service uses heavy diesel waste collection vehicles that operate across the county, alongside two new electric refuse collection vehicles (eRCVs). An existing contract will operate throughout the period of this plan. The contract can accommodate emissions reduction including switching from diesel to a renewable fuel.

Demand for waste collection can be expected to rise with population and housing growth. As more forms of waste are recycled, the additional collection increases the fuel required and so increases the collection emissions. Likewise, any reduction in frequency of collections would reduce fuel consumption. eRCVs are currently used on some routes but cost, availability, range and charging locations present further challenges.

Public Realm contract: This is the outsourced management of the county's highways, green spaces and other public spaces. A new contract for this service will commence in 2026 and appropriate emissions reduction measures are expected within contract delivery. Action here is delivered through the specification and monitoring of the contract. Emissions reductions are estimates based on the switch to EV and HVO fuel for fleet and plant. Further emissions reductions will be identified by the contractor via annual plans.





4.7 Offset

Offset actions reduce or remove emissions that occur outside of the council's reporting boundary. Where this reduction can be measured it is subtracted from the council's overall emissions.

Solar energy export

Solar panels are installed on a number of council owned and operated buildings. The electricity generated is used in the building where they are installed. This reduces the amount of electricity imported from the grid with any excess exported into the electricity grid. This exported renewable electricity is then consumed by others.

We can measure our exported renewable electricity (in kWh) and this offsets equivalent emissions from elsewhere within our operational boundary.

Solar energy generation

The council owns and leases building to tenants who are responsible for their energy bills. Energy used in these tenanted buildings falls outside of the council's emissions boundary. Where solar panels are installed, the tenants benefit from the renewable energy they consume directly. This reduces the amount of electricity the tenants import from the grid and so has a clear and measurable reduction on the tenants' emissions. Any excess is exported to the grid and consumed by others.

Measured renewable electricity generation from tenanted buildings (in kWh) offsets equivalent emissions from elsewhere within our operational boundary.

Emissions avoided by the use of the Hereford City Bike Share Scheme

The council provides a city-wide bike share scheme in Hereford. This is operated by our delivery partner who record the mileage covered by the fleet of pedal and electric bikes and calculate an emissions saving each year compared to journeys that would have otherwise taken place using fossil fuels. These savings are used to offset equivalent emissions from our operational boundary.





Domestic emissions reduction delivered in the county via council support

The council manages projects that improve the energy performance of private homes in the county. This reduces any occupiers' future emissions each year. These savings are used to offset equivalent emissions from our operational boundary.

The offset will be calculated each year based on the fuel use reduction achieved through the improved energy performance of the homes. This will be calculated using the energy use figures supplied by the Energy Performance Certificate before and after the improvement. For solar PV installations, a modelled generation figure, average system size and assumed 50% export will be applied and the emissions avoidance calculated each year using the annual UK grid emissions intensity. Offset figures will apply for the first 10 years after installation.

Biochar production - future offset potential

Biochar production has enabled other local authorities to offset emissions. This offers a potential offset solution for Herefordshire subject to further project development. Biochar is a carbon rich material created by heating biomass in a low oxygen environment. This charcoal-like substance stores the carbon that its source material ('feedstock') removed from the atmosphere when growing. Biochar has numerous immediate uses as a soil improver and ongoing research is considering other applications in construction and water filtration. Production facilities can generate and supply heat or electricity alongside usable quantities of biochar. The process can be certified to produce carbon credits that could be claimed as offset or sold.

Initial investigations demonstrate that there are numerous potential feedstock supplies in the county including sawmills, arisings from orchard and woodland management, and a range of potential by-products from agricultural production and food processing. Site location to ensure the energy generation can be used efficiently is also essential.

Detailed analysis of feedstock, location and costs are required to enable full business case development, but initial figures indicate that £4.3 million investment in a biochar production facility to process 1 tonne of biomass per hour would potentially generate £1.4 million per year.

A heat pump installed at a private home through the council's Home Upgrade Grant scheme



5. Action plan and emissions change estimates

With emissions sources well defined and understood, potential actions for reduction can be developed. As reduction is driven by changes to fuel use – using less, improving efficiency and using lower emissions fuels – it is straightforward to identify solutions. In practical terms, there are only a limited number of options available to reduce a particular emissions source.

The action plan identifies possible solutions for each emissions source and estimates the potential costs and emissions reduction. Actual delivery will depend on a more detailed feasibility appraisal, project design and development of a specific business case for each action. Delivery is also likely to be linked to the scope of funding sources available at a particular time.

The action plan details:

- The changes that can deliver reduction from each emissions source
- Estimated cost
- Estimated contribution to emissions reduction

Accurate cost and emission change figures will need to be developed for each action as part of the business case.

Numerous factors will influence the actual reductions achieved:

- Costs are estimated based on simple market price checks in Autumn 2025.
- Reduction estimates use the energy emissions factors produced by the Department for Energy Security and Net Zero (DESNZ) in 2024.
- The impact of operational changes on emissions will need to be included when these are fully understood.

Monitoring and updates

The delivery of emissions reduction actions over the plan period can only be confirmed when the appropriate governance and budget are in place. As it is not feasible to provide this detail and certainty at the commencement of the plan period, it will be essential to monitor and report progress as and when the opportunity for delivery arises.

Council's annual emissions report: The annual emissions report is the primary means to monitor progress of this plan. The report aligns with the organisational boundary and actions in this plan and so can be used to monitor overall emissions change. The data used for the report is gathered from across the council and allows for year-on-year comparison to track the emission change from each source, such as a single building or overall business mileage claimed. Reporting is adaptive to organisational change and improvements in data collection.

¹³[Greenhouse gas reporting: conversion factors 2024 - GOV.UK](#)

Data from Scope 3 contracted services is provided by the council's contractors. For consistency across the data sources, the energy consumption data is used to calculate an emissions figure. Contract monitoring terms should include provision for the data transfer to Herefordshire Council to align with the annual reporting cycle, 6 months after the end of the preceding financial year.

The emissions reporting also forms part of the council's overall performance monitoring.

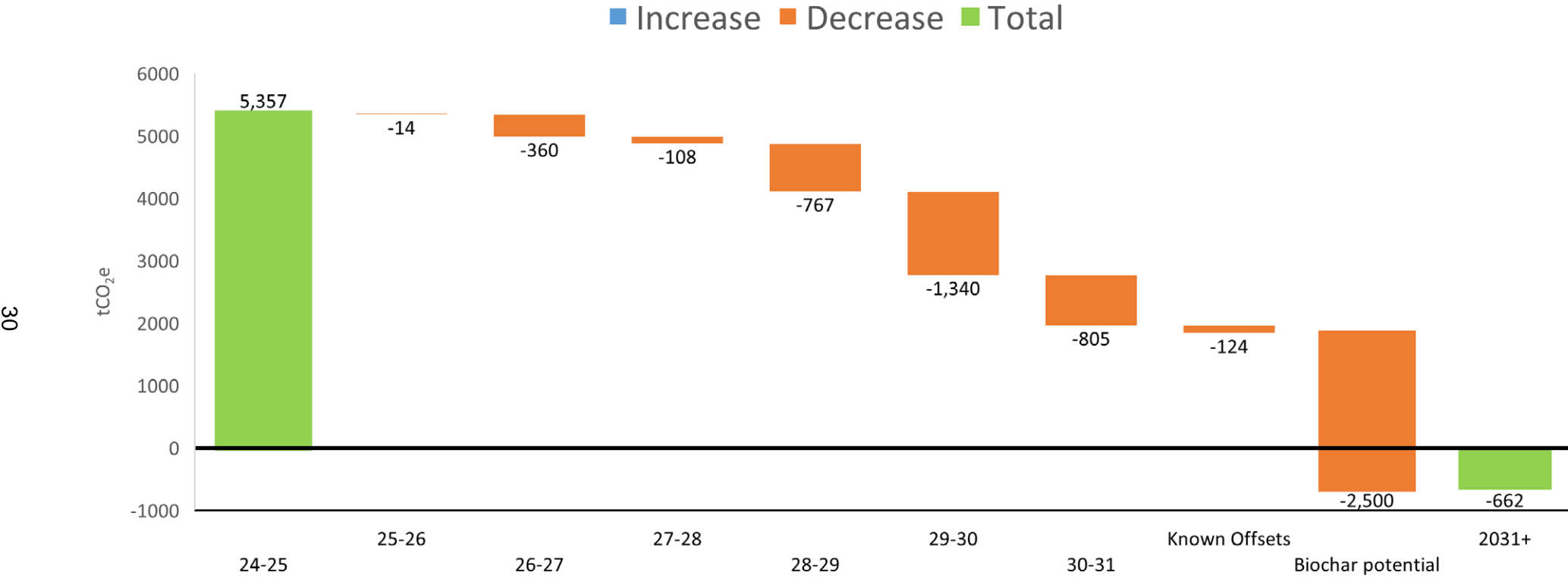
Residual emissions

The actions demonstrate a pragmatic but credible summary of the emissions reduction that could be achieved. Even after successful delivery of all of the actions, it is expected that some residual emissions will remain. These are from:

- Sources where the council has only a limited capability to drive change such as the employee emissions from homeworking and commuting
- Some business miles are likely to be required where low emissions alternatives are impractical
- Specialist vehicles required for certain operational needs, where low emission replacements are difficult and expensive to source.

The action plan identifies a number of potential projects that would offset these remaining emissions. Offsetting estimates are included where there are accurate figures that provide the necessary confidence that the offset has occurred. Further potential offsetting sources including biochar production will continue to be evaluated.

Herefordshire Council Potential Emissions Change to 2031



This chart illustrates how the potential emissions reduction could be achieved over the period of the plan. It is based on the modelled estimates of emissions change resulting from the delivery of the actions. It is intended to demonstrate the scale and rate of change. Actual timing and quantity of emissions change will be subject to funding, opportunity and other factors.

Action plan

5.1 Governance

No.	Action	Emissions source	Emissions change estimate tCO ₂ e	Comments	Estimated cost
G1	Improve guidance on assessing emissions impact in mod-gov reports	All sources	Enabling action	<ul style="list-style-type: none"> Foundational action to help identify opportunities for emissions reduction 	Officer time
G2	Provide carbon literacy training to councillors and supporting toolkit	All sources	Enabling action	<ul style="list-style-type: none"> Foundational action to help identify opportunities for emissions reduction 	£0

5.2 Council Fleet

No.	Action	Emissions source	Emissions change estimate tCO ₂ e	Comments	Estimated cost
F1	Develop costed planned replacement of fleet with zero emissions vehicles	Council fleet	-108	<ul style="list-style-type: none"> Cost based on replacing 40 diesel vans and 4 petrol hybrids with EV models Estimated cost is spend over direct replacement with diesel/petrol vehicles Initial purchase cost only Does not include income from disposal of existing fleet Does not include Operations and Maintenance (O&M) savings from fuel, tax and servicing Does not include fleet expansion from school transport or public realm contract 	£600,000
F2	Ensure EV charging facilities available as required	Council fleet, buildings - electricity	Enabling action	<ul style="list-style-type: none"> Charging infrastructure will be required to support the transition to EV fleet 	£100,000 based on 150kW of charging capacity
F3	Driver and fleet management	Council fleet	-11	<ul style="list-style-type: none"> Mileage reduction and improved driver performance would deliver O&M savings Emissions reduction based on 10% of existing petrol/diesel fleet emissions 	£10,000 Driver Training (50 drivers at £200 each)

5.3 Council Estate

No.	Action	Emissions source	Emissions change estimate tCO ₂ e	Comments	Estimated cost
B1	Deliver identified building fabric and heating system improvements	Buildings - gas	-13.7	<ul style="list-style-type: none"> Emission reduction based on fossil gas supply 	£35,000
B2	Deliver identified lighting systems improvements and control upgrades	Buildings - electricity	0	<ul style="list-style-type: none"> Reduction of c.53,000 kWh of annual energy demand WTT and T&D emissions reduction 	£167,000
B3	Installation of solar rooftop PV systems on buildings	Buildings - electricity	0	<ul style="list-style-type: none"> Reduction of c.27,000 kWh of annual energy demand 	£63,100
B4	Identify and implement water saving measures	Water & sewerage	-0.8	<ul style="list-style-type: none"> Reduction target of 10% 	£0 -behaviour and operational changes
B5	Review building use and occupation patterns to improve energy saving behaviour	Buildings - gas and electricity	0	<ul style="list-style-type: none"> Reduction target of 5% 	£0 - behaviour and operational changes
B6	Secure certified green biogas supply to all council buildings	Buildings - gas	-690.6	<ul style="list-style-type: none"> Reduction based on kWh consumption in 24/25 	Additional £50,000 p.a. (compared to natural gas)
B7	Ensure all new lighting is low energy and limits light pollution	Street lighting	0	<ul style="list-style-type: none"> Cost increases from expanded street lighting inventory. No emissions increase assumes renewable supply 	Determined by operational need

5.4 Derived factors

No.	Action	Emissions source	Emissions change estimate tCO ₂ e	Comments	Estimated cost
D1	Change in electricity Transmission & Distribution emissions from actions	T&D	10.3	<ul style="list-style-type: none"> Overall increase from vehicle charging 	£0
D2	Change in Well-to-Tank emissions from actions	WTT	-46.5 -26.7 +28	<ul style="list-style-type: none"> Demand reduction and biogas Diesel and petrol - fleet changes Electricity - fleet and building changes 	£0

5.5 Employees

No.	Action	Emissions source	Emissions change estimate tCO ₂ e	Comments	Estimated cost
E1	Collect data on employee working patterns through periodic survey	Commuting and homeworking	Enabling action	<ul style="list-style-type: none"> To gain insight into employee travel and working patterns, to help inform other actions and employee strategy 	Officer time
E2	Training and awareness of employee travel emissions	Commuting and homeworking	-19.1	<ul style="list-style-type: none"> Enables and encourages employee choice of low emissions options 	Officer time
E3	Increase usage of EV pool car fleet	Business miles	-30.2	<ul style="list-style-type: none"> Reduction based on 10% of existing business miles Increases mileage of council fleet 	Officer time

5.6 Contracts

No.	Action	Emissions source	Emissions change estimate tCO ₂ e	Comments	Estimated cost
C1	Use of renewable fuel for waste collection vehicles	Waste collection contract	-1,216.9	<ul style="list-style-type: none"> This is fuel switch from diesel to Hydrotreated Vegetable Oil (HVO) for the waste collection fleet Cost includes increase of 50% fuel use from increased recycling collections and an 1% increase in collection distances 	+£236,250 p.a. (based on £0.35 price for HVO over diesel and based on annual usage of c.675,000 litres)
C2	Use of renewable fuel for waste transfer vehicles	Waste transfer contract	-786.3	<ul style="list-style-type: none"> This is fuel switch to HVO for the waste transfer fleet Cost includes increase of 50% fuel use from increased recycling collections and 1% increase in collection distances 	+262,500 pa (based on £0.35 price for HVO over diesel and based on annual usage of c.750,000 litres)
C3	Provisions in Public Realm contract	Public Realm contract	-495.2	<ul style="list-style-type: none"> EV use across Light Commercial Vehicles (LCV) fleet, electrification of small plant and HVO use in compatible heavy vehicles Assumes continued use of certified renewable electricity 	Expectation that this will be delivered within the approved cost framework

5.7 Offset

No.	Action	Emissions source	Emissions change estimate tCO ₂ e	Comments	Estimated cost
O1	Offset – emissions savings from county retrofit delivery	Offset	-24	<ul style="list-style-type: none"> Estimate average of -0.25tCO₂e per home 	£0 - offsets are based on existing installations
O2	Offset -solar PV generation from tenanted properties	Offset	-88	<ul style="list-style-type: none"> Offset value based on solar export and UK grid intensity Grid figure expected to reduce each year, reducing offset 	£0 - offsets are based on existing installations
O3	Offset – Hereford City Bike Share	Offset	-12	<ul style="list-style-type: none"> Offset value based on recorded journeys 	No additional budget required
O4	Offset – Biochar production	Offset	-2500	<ul style="list-style-type: none"> An initial assessment of the carbon storage potential indicates that biochar production could remove up to 2,875t of CO₂e per year Conservative estimate of 2,500t should be achievable 	£4.3M - outline cost estimate for a 1tonne per hour pyrolysis plant. Sale of energy, biochar and value of carbon credits estimated at £1.4M/year
O5	Offset – Carbon sequestration delivered through planning gain	Offset	Potential to be determined	<ul style="list-style-type: none"> Develop a means to quantify the offset achieved through tree planting and other habitat creation as a result of planning permissions 	£0 – initial assessments expected to be delivered by current officers
O6	Offset - Identify council owned land for potential sequestration projects	Offset	Potential to be determined	<ul style="list-style-type: none"> Detailed assessment of opportunities required 	£0 – initial assessments expected to be delivered by current officers

5.8 Summary of potential emissions changes over plan period

This table shows the potential emissions change over time and is a summary of the emissions reduction estimates included in the preceding tables. All figures are in tonnes of CO₂e.

Group	Emissions source	24-25	25-26	26-27	27-28	28-29	29-30	30-31	Known Offsets	Biochar potential	2031+
Fleet	Council fleet	108.4			-108.4						0.0
Estate	Buildings - gas	705.3	-13.7			-690.6					0.9
	Buildings - electricity	8.1									8.1
	Street lighting	0.0									0.0
	Buildings - Water & sewerage	7.5		-0.8							6.7
Derived factors	Electricity import T&D	58.8		7.6	2.2						68.6
	Street lighting T&D	30.6					0.5				31.1
	Well-to-Tank WTT	386.8		28.0	-26.7	-46.5					343.1
Employees	Business miles	301.9				-30.2					271.7
	Commuting & Homeworking	957.6						-19.1			938.5
Contracts	Public Realm Contract	610.3		-371.3				-123.9			115.1
	Waste Collection	1,255.8						-1,216.9			38.8
	Waste Transfer	926.1						-786.3			139.8
Offset	Total offsets	-100.0	-4.0	-4.0	-4.0	-4.0	-4.0	-4.0	-124.0	-2,500.0	-2,624.0
	TOTAL TCO₂e	5,357.2	-13.7	-336.5	-132.9	-767.3	-1,340.3	-805.4	-124.0	-2,500.0	-661.5
	08-09 Baseline	14,660.2									
	Change from baseline	63.5%	63.6%	65.8%	66.8%	72.0%	81.1%	86.6%			104.5%

5.9 Summary of cost estimates

		Status at commencement of plan period	Revenue	Capital	Profiled delivery year
	GOVERNANCE				
G1	Decision guidance	Underway			All
G2	Carbon Literacy	Subject to funding - cost would be one-off during plan period			2027/28
	COUNCIL FLEET				
F1	Zero emissions fleet	Fleet due replacement and changes in PRC creates opportunity for zero emission vehicles		£600,000	2027/28
F2	EV chargers	To support zero emissions fleet - increases electricity costs, reduces diesel/petrol revenue costs		£100,000	2027/28
F3	Driver fleet management	Subject to funding, this cost would be one-off during plan period	£10,000		2027/28
	COUNCIL ESTATE				
B1	Building fabric	Works have been identified and estimated, delivery aligned to other renovation work	Potential saving	£35,000	All
B2	Lighting upgrades	Works have been identified and estimated, delivery aligned to other renovation work	Potential saving	£167,000	All
B3	Rooftop Solar	Works have been identified and estimated, delivery aligned to other renovation work	Potential saving	£63,100	All
B4	Water saving	Opportunity as part of wider estate review	Potential saving		All
B5	Review building usage and operation	Opportunity as part of wider estate review	Potential saving		All
B6	100% biogas supply to council buildings	Additional cost per year but cost effective per ££ of CO ₂ e reduction; cost reduces with efficiency gains from B1	£50,000		2028/29
B7	New street lighting	Street lighting energy use can be expected to increase as the network grows	Future cost increase		All
	DERIVED FACTORS				
D1	Transmission & Distribution losses	No additional costs			All
D2	Well-to-Tank emissions	No additional costs			All

		Status at commencement of plan period	Revenue	Capital	Profiled delivery year
	EMPLOYEES				
E1	Employee survey	Requires employee engagement and officer time			2026/27
E2	Employee travel	Requires employee engagement and officer time	Potential saving		2030/31
E3	Increase pool car use	Requires employee engagement and officer time	Potential saving		2028/29
	CONTRACTS				
C1	HVO for waste collection	HVO in high demand and costs have increased; annual revenue cost is amount expected over diesel	£236,500		2029/30
C2	HVO for waste transfer	HVO in high demand and costs have increased; annual revenue cost is amount expected over diesel	£262,500		2030/31
C3	Public Realm	No additional costs over contract value identified			2027/28
	OFFSET				
O1	County domestic retrofit	No additional costs for offset over scheme delivery costs			All
O2	Solar on tenanted properties	No additional costs for offset over scheme delivery costs			All
O3	Hereford City Bike Share	No additional costs for offset over scheme delivery costs			All
O4	Biochar production	Major project - feasibility and financing to be developed during plan period		£4,300,000	2030/31
O5	Planning gain	Feasibility to be developed over plan period			
O6	Council land carbon storage	Feasibility to be developed over plan period			
	Totals		£563,500	£5,265,100	



Appendix I: Review of emissions reporting

Setting an organisational boundary

The supply of goods and services is interconnected across entire economies. The purchase of a single item or service is supported by far wider economic activity. The economic and emissions footprint of a local authority can extend to potentially hundreds if not thousands of other businesses all making their contribution. When reporting the emissions impact of an organisation it is important to recognise that a boundary must be set for how far this impact reaches.

The purpose of emissions reporting is to identify emissions sources, develop actions to reduce those emissions and to then monitor the impact of those actions. This is best supported by a boundary that can be applied consistently to the emissions sources that can be controlled.



The Greenhouse Gas Protocol describes how an organisation determines which emissions sources to include within its reporting. This is referred to as the 'organisational boundary'. The protocol offers two definitions of this boundary; financial control; or operational control. Operational control has been used previously and this continues to provide the best approach for local authority services.

The council can exercise different levels of control over each emissions source and so the extent of operational control must be clearly defined. Emission sources can then be evaluated to determine if they fall within the boundary. This is the foundation of sound reporting as it provides consistency over which emissions sources to include.

Emissions reporting is a dynamic process requiring regular review in order to adapt to organisational and operational changes. The development of the new Carbon Management Plan included a review of the reporting boundary as the sources included should also be the focus of action. This ensures that annual reporting can monitor the impact of delivery.



Definition of operational control boundary

Emissions are considered within the operational control boundary if they satisfy the following:

Scope 1

- Fuels used in vehicles the council operates and manages, whether owned or leased
- Gas or other fuels consumed in buildings the council owns or leases and has control of utilities

Scope 2

- Electricity consumed in buildings the council owns or leases and has control of utilities
- Electricity consumed in the county street lighting network maintained by the council

Scope 3

- Water supplied and sewerage volumes from buildings the council owns or leases and has control of utilities
- Transmission and Distribution losses for electricity supplied in Scope 2
- Well-to-Tank emissions for all Scope 1 and Scope 2 fuels

Scope 3 - Employees

- Council employees commuting and working from home
- Business miles claimed by employees of the council

Scope 3 - Contracts

- Public Realm contract
- Countywide waste collection and transfer including the council's own waste

This boundary:

- Aligns with the principles of the GHG protocol
- Includes those sources where the council can exercise operational control
- Can be consistently applied across the council's services
- Is supported by reliable and consistent data

Outside of boundary

The emissions impact of council operations extends beyond the operational control boundary. Defining a consistent boundary also identifies those sources where the council does not have the necessary operational control to deliver emissions change. These sources are considered outside of the operational control boundary, but they can still be supported and engaged to deliver emissions reduction.

The following emissions sources are outside of the council's operational control:

Council owned buildings where another organisation has control of utilities

This includes schools, academies, leisure centres, care homes, tenanted commercial, retail and residential premises.



Materials and goods purchased by the council

The council has significant purchasing power through its procurement procedures. Obtaining data on the emissions impact of products is highly complex, inconsistent and the council has limited powers to influence suppliers.



Contracted services

The council procures diverse services from a range of different providers. Unlike the large waste and public realm contracts, the council has limited control over the service provision and so has to select providers based on what the market can provide. This includes contracted travel for school transportation.



Financial control

The council holds ownership in several commercial enterprises. These sources are outside of the organisational control boundary but would potentially fall within a financial control boundary. These are Hoople, Envirosort Energy from Waste plant, and West Mercia Energy. These operate as separate commercial entities and may have reporting requirements of their own.

Changes from previous reporting

The reported emissions sources from previous years were evaluated against this definition of operational control. It identified that there were inconsistencies in how operational control has been previously applied. After further evaluation it was determined that the council does not have the necessary control to deliver emissions reduction from some sources. These are now considered outside of the boundary as described above.

The review also identified sources that have not been previously included within reporting but do fall within the operational control boundary. These will be included in reporting for the duration of this plan.

Outside of new boundary	Additional sources within boundary
Scope 1 and Scope 2 fuels consumed in schools	Water supplied and sewerage at council operated buildings
Scope 1,2 and 3 emissions from the buildings operated by Halo Leisure	Well-to-Tank emissions for the councils Scope 1 and Scope 2 fuels
Scope 1,2 and 3 emissions from the buildings operated by Shaw Healthcare	
Scope 1,2 and 3 emissions from the Courtyard Theatre	
Transportation contracts	

New baseline

Overall progress on emissions reduction is measured from a baseline starting figure. It is essential that reporting changes are reflected in this baseline figure. This ensures that progress can be properly assessed by ensuring that the emissions sources measured remain consistent across the reporting period.

Energy use and carbon factor data from the 2008/09 year was used to recalculate a revised baseline figure for the new boundary. This is shown in the graph in Section 2.3.



If you would like help to understand this document or would like it in another format or language please contact the **Environmental and Energy Management Team**
email: energy@herefordshire.gov.uk



For more information please contact: energy@herefordshire.gov.uk

Equality impact screening checklist

Remember that your completed checklist will be available to decision-makers and the public, and is therefore open to challenge. Consider what evidence is in place to support your answers.

	Yes	No
1. Does/will the policy or activity affect the public directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Have there been or likely to be any public concerns about the policy or proposal?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Does the evidence/data show an existing or likely differential impact for any of the protected characteristics (eg. age, sex, disability, race, religion, pregnancy, etc)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Do/will people who have different protected characteristics have different needs, experiences, issues or priorities in relation to this policy or activity?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Could the policy or activity affect how services, commissioning or procurement activities are organised, provided, where and by whom?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. Could the policy or activity affect our workforce or our employment practices (eg. software purchase, team restructure or relocation, HR policy)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Have complaints been received from different equality groups about the effect of this policy, proposal or our activities in general (having no complaints does not always mean there is no issue?)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. Does the policy involve, or will it have an impact upon, eliminating unlawful discrimination, promoting equality of opportunity, or promoting good relations between different groups?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9. Is there likely to be an adverse/negative impact or risks to the organisation, for users, equality groups or staff if the policy or activity is implemented in its current format?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Add up the "yes" column:

How many answers are "yes"?:

0: **No impact** – the process is complete.

1-3: **Low impact** – an EIA is not required at this point (you can complete a light-touch EIA now or later if you want to – that is never wrong). But you must still indicate within your documentation and decision papers what [equality factors](#) you have considered. This is a statutory requirement, and is open to challenge and scrutiny.

4-9: **High impact** - a full [EIA](#) is required immediately. The EIA can be reviewed, re-done, or updated at any time as necessary.

Independents for Herefordshire



Date: 23 March 2026

Political Group Consultation Response on behalf of Independents for Herefordshire regarding Herefordshire Council's Draft Carbon Management Plan 2026/27–2030/31

1. Introduction

This report provides a critical appraisal of Herefordshire Council's proposed Carbon Management Plan (CMP) for 2026/27–2030/31, drawing on the presentation materials and Political Group Consultation discussions held on 23 March 2026, the current Carbon Management Plan 2020/21–2025/26, the council's wider climate strategy and data from *Understanding Herefordshire*, the *Office for National Statistics (ONS)*, and *Zero Carbon Herefordshire*.

It is unfortunate that the draft of the actual Carbon Management Plan was not made available to members to inform the PGC discussion. It may be the case that some of the comments and queries provided in this formal written response are already addressed in the full document. Once again, Independents for Herefordshire request that PGCs are undertaken with officers having already provided – in good time – copies of the policy and draft decision reports to which the PGC relates.

The analysis is written recognising that Independents for Herefordshire are deeply committed to tackling the climate and ecological emergency, ensuring not only that the council honours its own net-zero commitments but also that Herefordshire as a whole—including its communities, economy, and agricultural base—makes rapid progress in decarbonisation, energy reduction, and equitable climate adaptation.

2. Overall Context and Direction

The proposed plan represents the council's fourth structured Carbon Management Plan and covers the critical final phase to 2030/31, when the council has pledged to reach operational net zero.

It builds on considerable success—more than 60% reduction since 2008/09—and reflects a maturing approach, shifting from the easier direct savings to the complex, high-cost areas such as fleet, gas heating, and contracted services.

However, the plan risks becoming technocratically narrow and losing public legitimacy if it continues to focus only on the council's reduced operational boundary while failing to address the wider system changes across Herefordshire's rural economy and supply chains.

The county's agricultural emissions, which make up around 40% of total territorial greenhouse gases, remain largely static since 2005. This underlines why the council's leadership must extend beyond internal carbon accounting to whole-county transformation.

3. Revised Boundary and Governance

The revised emissions boundary defines the council's footprint by operational control; excluding schools, Halo Leisure, Shaw Healthcare, and other partially owned assets. Officers justify this in line with the Greenhouse Gas Protocol, aiming for consistency and control-based accountability.

While this may be technically sound, it creates a real political and leadership risk. Excluding significant institutions diminishes visibility of the council's true systemic influence and opens the council to accusations of "moving the goalposts."

Public trust depends on transparency. Independents for Herefordshire suggest that council must therefore publish two complementary accounts:

- **Operational Net Zero Account** – the strict GHG Protocol boundary; and
- **County Influence Account** – capturing those bodies, contracts, and partnerships where the council plays an enabling or leadership role.

Such dual-track reporting would demonstrate integrity while still celebrating controlled emission reductions within the council's own span of control.

4. Major Emission Sources and Accountability

Even within the narrower boundary, over half of residual emissions derive from major service contracts, particularly waste and highways/public realm contracts. Current reporting includes waste collection (operationally controlled) but not disposal at the Worcestershire energy-from-waste plant.

This division may comply with the guidance, yet morally and strategically the council's responsibility is wider. The people of Herefordshire rightly expect their authority to be accountable for the full lifecycle of waste they generate, not only the emissions up to the county boundary.

A robust solution would be to publish reconciliation tables linking operational and county-level waste emissions, and to make contractor carbon-reduction commitments part of formal contract reporting.

5. The Role of Offsets and the Biochar Proposal

5.1 Current Plan Assumptions

The draft CMP introduces carbon offsets for the first time, including behavioural offsets (cycling schemes, retrofit insets) and a major proposed biochar offset project. The

projections suggest biochar would deliver over half of all remaining reductions needed for the 2031 target.

5.2 Risks and Concerns

Biochar has potential, but it is unproven at the scale envisaged, and its inclusion as the decisive measure is deeply risky. Challenges include:

- Feedstock availability and waste stream competition.
- Regulatory hurdles under environmental permitting schemes.
- Uncertain long-term sequestration verification.
- Multi-million-pound capital requirements and delivery lead times.
- No operational facilities of comparable scale in the region.

Placing more than half of the Council’s remaining emissions reduction on an early-stage technology is not credible. Should it stall, the whole trajectory to net zero will falter.

5.3 Constructive Alternatives (“Plan B”)

To ensure resilience and progress, Independents for Herefordshire suggest that the council should immediately advance parallel *no-regrets* actions:

1. **Accelerated retrofit and heating transition** across council buildings, prioritising gas reductions through **heat pump installation** and fabric-first efficiency upgrades.
2. **Expansion of on-site and partnership renewables**, using Power Purchase Agreements (PPAs) and exploring council-owned solar assets.
3. **Green procurement and supply chain standards**, embedding carbon reduction clauses in all major contracts.
4. **Local land-based carbon projects**—woodland creation, peat restoration, hedgerow expansion—verified through the UK Woodland and Peatland Carbon Codes.
5. **Behavioural and modal-shift programmes**, building on *Greener Footprints* but explicitly linking staff and county residents through incentives and training.

Biochar should be pursued as a research and development pilot, NOT the linchpin of the CMP.

6. Energy Use and Building Decarbonisation

Herefordshire Council’s electricity already comes from verified 100% renewable sources, a significant strength. Remaining estate emissions largely derive from gas.

Officers confirmed that heat pumps are included within the term “energy efficiency,” but Independents for Herefordshire seek clear targets.

The next iteration of the CMP should include a Building Decarbonisation Annex detailing:

- The ten highest-emitting buildings.

- Planned heat-pump installations and retrofit timelines.
- Business cases and external funding routes (Salix, PSDS 3c).

Without quantifiable milestones, progress risks drifting.

7. Fleet and Transport

Transport remains one of the most stubborn emission sources. The Council’s fleet electrification ambitions are positive, but are constrained by limited charging infrastructure. During the PGC discussions, concern was voiced that the county’s EV rollout is slow and overly dependent on a commercial partner.

Given Herefordshire’s rural geography and car dependence, the council must lead by example.

A Herefordshire-run public charging network—modelled on ChargePlace Scotland—would deliver consistency, affordability, and equity for residents without off-street parking. It is unfortunate that this administration may have already thrown away the chance of building such a network by outsourcing the ‘problem’ of delivering on its government targets for EV charging points to commercial operators. Clarification on this point is requested.

The council should also champion travel-demand reduction, active travel, and integrated rural mobility hubs, recognising that genuine decarbonisation involves changing patterns of movement, not just engine or fuel types.

8. Measurement and Data Integrity

The current methodology uses standard Defra emission factors, which average national fleet performance. This fails to capture genuine local improvements—especially growth in EV use among staff and councillors—thereby under-rewarding and under-recognising progress.

A voluntary annual staff survey and better data linkage from the council’s electric vehicle booking system would make monitoring both more accurate and motivating. Recognising, rewarding and celebrating staff and community champions for their achievements in delivering behaviour change and carbon emission reduction should also be considered.

9. Procurement, Embedded Carbon and Contractor Behaviour

The consultation discussions confirmed strong interest in tightening environmental standards on contractors, a “lowering the limbo bar” approach was described to push continual improvement. Waste and highways contractors have already adopted 2030 net-zero clauses, but embedded carbon in materials, such as in road construction, remains excluded.

Independents for Herefordshire suggest that by 2028, Herefordshire should commit to extend its scope to include consumption-based emissions, adopting the PAS 2080:2023 standard for infrastructure carbon management and following the examples of Devon and Oxfordshire councils.

This change would place the authority in the front rank nationally for responsible procurement.

10. Communication and Definition of Net Zero

The consultation discussion revealed some challenge and confusion about what “net zero” actually means in the context of this plan. Councillors and residents are entitled to clarity.

The final CMP must define terms plainly:

- **Absolute zero** – eliminating all emissions.
- **Net zero** – residual emissions offset by verified removals.
- **Offset** – emissions reduced or removed outside of direct operations.
- **Inset** – reductions achieved within council-influenced activities.

Failure to communicate this distinction risks undermining public confidence in the outcome.

11. Decision-Making and Wider County Integration

It was encouraging to hear confirmation during the PGC discussion that every Council decision report will now include an explicit carbon management statement, capturing emissions, adaptation, and nature impacts. This is a simple but powerful governance tool that must be standardised and enforced.

At county level, ONS data show that Herefordshire’s emissions fell by 38% between 2005 and 2023, behind the UK average of 43%. The slower pace is largely due to the agricultural sector, particularly livestock and soil emissions.

Given this, the Council must use its convening power—through the Herefordshire Climate and Nature Partnership Board—to accelerate support low-carbon farming, regenerative agriculture, and innovative methane-reduction methods. Leadership here should be as strong as within the council’s own operations.

12. Summary of Strengths, Weaknesses and Recommendations

Theme	Strengths	Risks / Weaknesses	Recommended Action
Boundary & Governance	Alignment with international reporting standards.	Loss of visibility; public perception of goalpost shifting.	Dual-track “operational + influence” reporting.
Contracted Services	Integration of carbon clauses in major contracts.	Waste disposal and embedded emissions omitted.	Transparent cross-boundary reporting; life-cycle accountability.
Offsets & Biochar	Innovation and scientific partnership.	Over-reliance on unproven technology; delivery uncertainty.	Re-classify as R&D; pursue diverse, deliverable abatement measures.
Estate / Heat	Renewable electricity already in place.	Gas use unaddressed; no clear retrofit targets.	Publish building-level decarbonisation plan with heat-pump targets.
Fleet / Transport	EV fleet transition under way.	Infrastructure gaps; grid constraints.	Council-led EV network, county-wide mobility strategy.
Measurement	Standardisation enables comparability.	Inaccuracy for EV users; limited insight.	Collect direct vehicle and commuting data.
Procurement & Materials	Early adoption of contract-based net-zero goals.	Embodied carbon not captured.	Adopt PAS 2080 and life-cycle carbon metrics.
Public Communication	Transparent officer engagement.	Confusion over “net zero.”	Publish plain-language glossary and visual scenario pathways.

Theme	Strengths	Risks / Weaknesses	Recommended Action
Leadership & County Integration	Active Climate and Nature Partnership Board.	Agricultural emissions lag; weak integration.	Strengthen farm-sector engagement; support county-wide transition.

13. Conclusions: A Call for Credible, County-Wide Climate Leadership

From an opposition standpoint, Independents for Herefordshire recognise and value the professionalism of officers and the council’s historic carbon reduction achievements. Yet also urge that the next stage must match technical precision with political honesty and bold leadership.

The revised CMP will only succeed if it combines:

- **Transparency** – honest accounting, dual-track reporting, and clear public communication.
- **Resilience** – diversified abatement portfolio, not over-reliant on uncertain offsets.
- **Leadership** – visible investment and enabling action that mobilises the county’s residents, farmers, and businesses.

Our agricultural economy is central to Herefordshire’s identity and to its carbon challenge. The Council cannot decarbonise alone, but it can—and must—lead by example, by setting high standards in its own operations and by encouraging AND empowering others to follow.

Delivering genuine net zero by 2030/31 will require determination, creativity, and cross-party collaboration. Independents for Herefordshire will support any credible, evidence-based measures that accelerate deep decarbonisation, ensure a fair transition for rural communities, and restore the county’s reputation as a rural leader in sustainability and climate stewardship.

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 Group Leader – Independents for Herefordshire
 Herefordshire Council

Date: 23 March 2026

Submitted on behalf of the Independents for Herefordshire

Date: March 2026

