

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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Herefordshire Council

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