



**Dr J Ives**  
**Chief Executive**  
South Derbyshire District Council,  
Civic Offices, Civic Way,  
Swadlincote, Derbyshire DE11 0AH.

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Our Ref  
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Date: 13 September 2023

Dear Councillor,

### **Environmental and Development Services Committee**

A Meeting of the **Environmental and Development Services Committee** will be held at **Council Chamber**, Civic Offices, Civic Way, Swadlincote on **Thursday, 21 September 2023** at **18:00**. You are requested to attend.

Yours faithfully,

**Chief Executive**

To:- **Labour Group**

Councillor S Taylor (Chair), Councillor K Storey (Vice-Chair) and  
Councillors A Archer, I Hudson, J Jackson, V Redfern, B Stuart and A Tilley.

**Conservative Group**

Councillors K Haines, J Lowe and P Watson.

**Liberal Democrats**

Councillor G Andrew

**Non-Grouped**

Councillor A Wheelton.



## **AGENDA**

### **Open to Public and Press**

- 1** Apologies and to note any substitutes appointed for the Meeting.
- 2** To receive the Open Minutes of the following Meetings held on:  
  
02 March 2023 **4 - 7**  
  
20 April 2023 **8 - 14**  
  
30 May 2023 **15 - 19**  
  
10 August 2023 **20 - 25**
- 3** To note any declarations of interest arising from any items on the Agenda
- 4** To receive any questions by members of the public pursuant to Council Procedure Rule No.10.
- 5** To receive any questions by Members of the Council pursuant to Council procedure Rule No. 11.
- 6** BUDGET SETTING APPROACH 2024-25 **26 - 31**
- 7** WOODVILLE LINK ROAD BIODIVERSITY NET GAIN PROJECT -  
PROGRESS UPDATE **32 - 84**
- 8** ANNUAL REVIEW OF THE COUNCIL'S CLIMATE AND ENVIRONMENT  
ACTION PLAN (2021-30) **85 - 148**
- 9** ELECTRIC VEHICLE CHARGE POINT INFRASTRUCTURE **149 -  
156**
- 10** DESIGNATION OF FINDERN NEIGHBOURHOOD AREA **157 -  
162**

<b>11</b>	<b>MEMBERSHIP OF THE LOCAL PLAN WORKING GROUP</b>	<b>163 - 165</b>
<b>12</b>	<b>THE DEPARTMENT FOR LEVELLING UP, HOUSING AND COMMUNITIES CONSULTATION ON IMPLEMENTATION OF PLAN-MAKING REFORMS</b>	<b>166 - 224</b>
<b>13</b>	<b>COMMITTEE WORK PROGRAMME</b>	<b>225 - 230</b>

**Exclusion of the Public and Press:**

- 14** The Chairman may therefore move:-  
That in accordance with Section 100 (A)(4) of the Local Government Act 1972 (as amended) the press and public be excluded from the remainder of the Meeting as it is likely, in view of the nature of the business to be transacted or the nature of the proceedings, that there would be disclosed exempt information as defined in the paragraph of Part I of the Schedule 12A of the Act indicated in the header to each report on the Agenda.
- 15** To receive the Exempt Minutes of the following Meetings:  
02 March 2023  
20 April 2023  
30 May 2023
- 16** To receive any Exempt questions by Members of the Council pursuant to Council procedure Rule No. 11.
- 17** OPERATIONAL SERVICES COMMERCIALISATION PLAN 2023-26

ENVIRONMENTAL AND DEVELOPMENT SERVICES  
COMMITTEE

2 March 2023

OPEN

**PRESENT:**

**Labour Group**

Councillor Taylor (Chair) and  
Councillors Dunn (substituting for Councillor Heath), M Mulgrew, Rhind  
(substituting for Councillor Pegg), Singh and Southerd

**Conservative Group**

Councillors Brown, Ford, Haines, Patten (substituting for Councillor  
Fitzpatrick), Smith (substituting for Councillor Lemmon) and Watson.

**Non-Grouped**

Councillor Wheelton

**In attendance**

Councillor Gee  
Councillor Tilley

EDS/67 **APOLOGIES**

The Committee was informed that apologies had been received from  
Councillors Heath and Pegg (Labour Group), and Councillors Fitzpatrick  
and Lemmon (Conservative Group).

EDS/68 **DECLARATIONS OF INTEREST**

The Committee was informed that no declarations had been made.

EDS/69 **QUESTIONS FROM MEMBERS OF THE PUBLIC UNDER COUNCIL  
PROCEDURE RULE NO 10**

The Committee was informed that no questions from Members of the Public  
had been received.

EDS/70 **QUESTIONS BY MEMBERS OF THE COUNCIL UNDER COUNCIL  
PROCEDURE RULE NO 11**

The Committee was informed that no questions from Members of the  
Council had been received.

**MATTERS DELEGATED TO COMMITTEE****EDS/71 CORPORATE PLAN 2020-24: PERFORMANCE REPORT (2022-2023 QUARTER 3 – (1 APRIL TO 31 DECEMBER))**

The report was presented to the Committee by the Strategic Director (Service Delivery) who outlined the key points within the report.

Members raised queries regarding planning applications. and the Green Homes project.

The Head of Planning and Strategic Housing informed the Committee that applications received in the current calendar year were being processed within statutory timelines. It was noted that the number backlog of applications had reduced and that a comprehensive report was to be presented to the Committee in April.

Councillor Haines sought clarity regarding the Green Homes project.

Head of Environmental Services informed the Committee that the government had extended the delivery of funding by 6 months and noted that there was an issue with take up but there were a number of applications recently received. The Committee was also informed that the Council had applied for a 2 year funding regarding homes upgrades.

**RESOLVED:**

***1.1 The Committee approved progress against performance targets set out in the Corporate Plan 2020 - 2024.***

***1.2 The Risk Register for the Committee's services was reviewed.***

**EDS/72 SOUTH DERBYSHIRE ECONOMIC DEVELOPMENT AND GROWTH STRATEGY**

The Chair addressed the Committee and thanked the Chief Executive and the Team for successfully bringing in new businesses and the improved prosperity for South Derbyshire.

The report was presented to the Committee by Head of Economic Development and Growth outlining the key points within the report. The Head of Economic Development and Growth highlighted the major investments in District, the Regeneration Route, Covid Business support Programme, the National Forest, the refurbishment of shop frontages and new visitors centre within Swadlincote and the new businesses start up support programme. The Committee was assured that the new strategy would continue in the same way bringing a more sustainable future for the South Derbyshire.

The Chief Executive addressed the Committee and stressed the importance of the strategy and that it would ensure that South Derbyshire was open for business for the foreseeable future.

Members raised queries regarding ecommerce and support for small and medium sized enterprises.

The Chief Executive informed the Committee that there was support from a business support adviser regarding the promotion of both online and in person business. It was further noted that pandemic had brought together small and medium sized businesses for support and explained that there more connectivity than ever before.

**RESOLVED:**

***1.1 To endorse the South Derbyshire Economic Development and Growth Strategy 2023-27.***

EDS/73 **THE DEPARTMENT FOR LEVELLING UP, HOUSING AND COMMUNITIES CONSULTATION ON THE REFORMS TO NATIONAL PLANNING POLICY**

The Planning Policy Team Leader presented the report to the Committee and outlined the salient points. It was noted that the Council's response included the need for the government to provided resources to enable delivery in hard to reach areas, that the burden for evidence should be removed and consideration the requirement for sustainable energy, affordable rents for affordable homes and how national development policies did not support local plans and policies.

The Chair informed the Committee that the Local Plan Working Group had reviewed the consultation and fed into the responses.

Members commended the report and recognised the amount of work that had been undertaken to put together the consultation responses.

**RESOLVED:**

***1.1 Members approved the submission of a response to consultation in line with officer recommendations (detailed in Appendix 1).***

EDS/74 **COMMITTEE WORK PROGRAMME**

The Strategic Director (Corporate Resources) presented the report to the Committee.

**RESOLVED:**

**1.1 The Committee considered and approved the updated work programme.**

EDS/75

**LOCAL GOVERNMENT ACT 1972 AS AMENDED BY THE LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985**

**RESOLVED:**

***That, in accordance with Section 100(A)(4) of the Local Government Act 1972 (as amended), the press and public be excluded from the remainder of the Meeting as it would be likely, in view of the nature of the business to be transacted or the nature of the proceedings, that there would be disclosed exempt information as defined in the paragraphs of Part 1 of the Schedule 12A of the Act indicated in brackets after each item.***

**EXEMPT QUESTIONS BY MEMBERS OF THE COUNCIL UNDER COUNCIL PROCEDURE RULE NO 11**

***The Committee was informed that no exempt questions from Members of the Council had been received.***

**REVIEW OF OPERATIONAL SERVICES STRUCTURE**

***The Committee approved the recommendations within the report.***

**MECHANIC SALARY AND FLEET MAINTENANCE**

***The Committee approved the recommendations within the report.***

**SERVICE LEVEL AGREEMENT RELATING TO CONSERVATION ADVICE**

***The Committee approved the recommendations within the report.***

The meeting terminated at 19:25 hours

COUNCILLOR TAYLOR

CHAIR

ENVIRONMENTAL AND DEVELOPMENT SERVICES  
COMMITTEE

20 April 2023

OPEN

**PRESENT:**

**Labour Group**

Councillor Taylor (Chair) and Pegg (Vice-Chair)  
Councillors M Mulgrew, Rhind (substituting for Councillor Heath), Singh  
and Southerd.

**Conservative Group**

Councillors Bridgen (substituting for Councillor Haines), Brown,  
Fitzpatrick, Lemmon, Smith (substituting for Councillor Ford) and Watson.

**Non-Grouped**

Councillor Wheelton.

EDS/80 **APOLOGIES**

The Committee was informed that apologies had been received from  
Councillor Heath (Labour Group), and Councillors Ford and Haines  
(Conservative Group).

EDS/81 **MINUTES**

The Open Minutes of meetings held on 11 August 2022, 22 September  
2022, 10 November 2022, 03 January 2023 and 26 January 2023 were  
received and signed by the Chair of the Committee.

EDS/82 **DECLARATIONS OF INTEREST**

The Committee was informed that Councillor Smith declared a personal  
interest in item EDS/85 by virtue of being a County Councillor.

EDS/83 **QUESTIONS FROM MEMBERS OF THE PUBLIC UNDER COUNCIL  
PROCEDURE RULE NO 10**

The Committee was informed that no questions from Members of the Public  
had been received.

EDS/84 **QUESTIONS BY MEMBERS OF THE COUNCIL UNDER COUNCIL PROCEDURE RULE NO 11**

The Committee was informed that no questions from Members of the Council had been received.

**MATTERS DELEGATED TO COMMITTEE**

EDS/85 **PRE-SUBMISSION DRAFT DERBYSHIRE AND DERBY MINERALS LOCAL PLAN**

The report was presented to the Committee by the Planning Policy Officer who noted the objections to the proposal that had been received. Members were pleased to receive the report and proposed that where practicable land around the various sites should be restored to their original state, including grasslands for wildlife and suggested that planning applications affecting the reserves should consult Derbyshire County Council.

Members proposed that delegated authority be given to the Strategic Director (Service Delivery) and the Chair of the Committee to make reasonable recommendations for objections that included suggestions made by the Committee.

**RESOLVED:**

***1.1 That the Committee agrees the Council's proposed response to Derby City Council and Derbyshire County Council's Draft Minerals Local Plan (MLP) consultation by objecting to:***

***(i) the allocation of more sites than are needed to meet the need for sand and gravel over the plan period based upon a forecast using the most recent annual average sales data in accordance with the National Planning Policy Framework (NPPF).***

***(ii) the allocation of the Sudbury and Foston sand and gravel site, on the basis that there has to date been no investigation as to whether the working of minerals on these sites, either individually or in combination, could lead to an increase in flood risk in the Lower Dove Valley. Any flooding could have a potential detrimental impact on considerable economic interests in the area as well as communities. Furthermore, the absence of flood risk evidence at the allocation stage means that any assessment to be submitted in support of subsequent planning applications that shows unacceptable adverse impacts may potentially lead to refusal. The sites cannot therefore be relied upon to contribute toward meeting sand and gravel needs over the plan period.***

*(iii) the allocation of the proposed Foston and Sudbury sand and gravel sites on the grounds that a precedent would be set in recent times for sand and gravel extraction in the Dove Valley, which would inevitably and irreversibly alter the character of the area.*

*(iv) the wording of Policy SP 19 which should be strengthened as follows:*

*“When considering the restoration of sand and gravel sites in the Trent, Derwent and Lower Dove Valley areas, the overall wider context of the site in the valley should be taken fully into account. ~~where practicable, including the potential for taking a coordinated approach with the restoration schemes of other sand and gravel workings in the area.~~ The Mineral Planning Authority will establish formal arrangements to work with communities and mineral operators and other stakeholders well in advance of the submission of any planning application to help ensure that proposals for mineral working in the Trent, Derwent and Lower Dove Valleys show how the restoration of sites will fit in with this long-term restoration strategy for sand and gravel sites in the river valleys.”*

*(v) the wording of the Principal Planning Requirements relating to restoration of minerals works in the river valleys in respect of each of the proposed new sand and gravel allocations which should be strengthened as follows:*

*“The restoration of the site should take into account ~~of~~ requirements relating to the Restoration Strategy for the Trent Valley, as set out in Policy SP19, to help ensure that proposals for mineral working in the Trent, Derwent and Lower Dove Valleys show how the mitigation, restoration and aftercare of sand and gravel sites will fit in with this long-term restoration strategy for sand and gravel sites in the river valleys.”*

*(vi) the application of the site assessment methodology for the reasons set out in paragraph 8.26.*

**1.2** *The Committee approved delegated authority be given to the Strategic Director (Service Delivery) in consultation with the Chair of Environmental and Development Services to amend the resolution to take account of the Committee’s comments about, where practicable considering other factors, restoring land to its original use.*

**EDS/86 DERBYSHIRE ROAD VERGES PROJECT**

The report was presented to the Committee by the Head of Operational Services who confirmed that the areas covered by the project were detailed in table 1 of the report and that Derbyshire County Council owned the highways and that South Derbyshire District Council would undertake the grass cutting described outlined in the report with one cut at the beginning of the season and one 'cut and collect' at the end of the season. It was noted that the project was led by Derbyshire County Council and would be responsible for all communications.

Members discussed whether South Derbyshire District Council had any influence to change the project as there was significant discontent with the proposals and raised particular concern regarding the listed areas. Members noted that the issue of ragwort should be considered and raised concerns that included a risk to visibility splays at junctions, the growth impact along narrow roads, children's safety, the destruction to the aspect of rural villages and biodiversity.

It was agreed that the Head of Operational Services share information regarding previous trials with the Committee.

The Strategic Director (Service Delivery) informed the Committee that the verges were in the ownership of Derbyshire County Council and had responsibility to deal with ragwort.

The Committee proposed that concerns raised by Members should be submitted with the response to Derbyshire County Council and an amended project plan be requested.

**RESOLVED:**

***1.1 That the Committee refused the proposed project plan and the areas of road verge to be included in this scheme.***

**EDS/87 NSIP CONSULTATION FOR OAKLANDS SOLAR FARM**

The report was presented to the Committee by the Head of Planning and Strategic Housing who confirmed that it was an opportunity for the Council to be involved and provide comments about the proposal during the pre-application stage. The Committee was informed that changes had been made since the original report which included revised access and additional information on Rights of Way and public footpaths.

The Chair clarified that South Derbyshire District Council would be able to enter a Planning Performance Agreement utilising South Derbyshire District Council and Derbyshire County Council expertise, with an option to access independent third party advice.

Members sought clarification regarding the development contribution of the Planning Performance Agreement and expressed concerns that South Derbyshire District Council did not have traffic and transport expertise.

The Head of Planning and Strategic Housing confirmed that the Council would contribute to Derbyshire County Council Highways Agency and outlined the processes under the Planning Performance Agreement. The Head of Planning and Strategic Housing clarified that an element of the development contribution would be used by South Derbyshire District Council to purchase additional information from third party experts.

### **RESOLVED:**

***1.1 The Committee considered and resolved the District Council's approach to securing relevant expert input into topic areas relating to the Oaklands Solar Farm project. Up to that point the District Council had relied upon specialist officers within Derbyshire County Council (DCC) to inform the relevant topics arising from the project where it had the expertise which the District Council did not, with the intention that if there were any gaps in specialist advisers with no appropriate in-house expert officers either within the District Council or Derbyshire County Council, then to seek to jointly secured services of a third-party specialist to advise both authorities on those matters. The Committee considered and resolved the merits of an alternative approach to securing expert input into topic areas, which would mean the District Council procuring its own third-party expertise from other sources.***

***1.2 The Committee considered and resolved the District Council's approach to securing a Planning Performance Agreement (PPA) associated with the project relating to the District Council. The Committee considered and resolved to seek advice on three areas: Transport and Access, Glint and Glare, and Geology, Soils and Agricultural Land.***

***1.3 The Committee considered and resolved the District Council's comments on a targeted re-consultation on recent changes made to the proposals including the additional highways impacts as a result of potential delays to the opening of the Walton bridge.***

### EDS/88 **COMMITTEE WORK PROGRAMME**

The Strategic Director (Corporate Resources) presented the report to the Committee and advised that the that the Work Programme was to be updated with the following reports:

- Corporate Performance and Risk Quarter 4
- Route Optimisation
- Enforcement and Regulatory Activity Annual Report 2023
- Climate and Environmental Action Plan Review
- Electric Recharge Infrastructure
- Environmental Services Commercialisation Plan Review –
- Authority Monitoring Report

Other areas for inclusion on the Work Programme were suggested and the following were noted, with dates to be confirmed.

- Review of South Derbyshire Smoke Control Areas
- Enforcement of Animals in Distress Policy
- Collection of Food Waste Proposals
- Fleet Management
- Local Plan Issues and Option Update
- Route Optimisation

The Chair requested an update to the East Midlands Airport and Gypsy Travellers Accommodation Assessment programmes.

**RESOLVED:**

***1.1 The Committee considered and approved the updated work programme.***

EDS/89

**LOCAL GOVERNMENT ACT 1972 AS AMENDED BY THE LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985**

**RESOLVED:**

***That, in accordance with Section 100(A)(4) of the Local Government Act 1972 (as amended), the press and public be excluded from the remainder of the Meeting as it would be likely, in view of the nature of the business to be transacted or the nature of the proceedings, that there would be disclosed exempt information as defined in the paragraphs of Part 1 of the Schedule 12A of the Act indicated in brackets after each item.***

**MINUTES**

***The Exempt Minutes of the Meetings held on 22 September 2022, 10 November 2022 and 26 January 2023 were received.***

**EXEMPT QUESTIONS BY MEMBERS OF THE COUNCIL UNDER COUNCIL PROCEDURE RULE NO 11**

***The Committee was informed that no exempt questions from Members of the Council had been received.***

**CONSULTATION ON PLANNING FEE INCREASE AND STAFFING CHANGES**

*The Committee approved the recommendations within the report.*

**GREEN WASTE PROCESSING CONTRACT**

*The Committee approved the recommendations within the report.*

The meeting terminated at 20:10 hours

COUNCILLOR S TAYLOR

CHAIR

ENVIRONMENTAL AND DEVELOPMENT SERVICES  
COMMITTEE

30 May 2023

OPEN

**PRESENT:**

**Labour Group**

Councillor S Taylor (Chair) and Councillor K Storey (Vice-Chair) and Councillors A Archer, I Hudson, J Jackson, V Redfern, B Stuart and A Tilley.

**Conservative Group**

Councillors K Haines, A Kirke (substituting for Councillor Fitzpatrick) and P Watson.

**Non-Grouped**

Councillor A Wheelton.

EDS/01 **APOLOGIES**

The Committee was informed that apologies had been received from Councillor M Fitzpatrick (Conservative Group).

EDS/02 **MINUTES**

The Open Minutes of meetings held on 11 August 2022, 22 September 2022, 10 November 2022, 03 January 2023 and 26 January 2023 were received and signed by the Chair of the Committee.

EDS/03 **DECLARATIONS OF INTEREST**

The Committee was informed that no declarations of interest had been received.

EDS/04 **QUESTIONS FROM MEMBERS OF THE PUBLIC UNDER COUNCIL PROCEDURE RULE NO 10**

The Committee was informed that no questions from Members of the Public had been received.

EDS/05 **QUESTIONS BY MEMBERS OF THE COUNCIL UNDER COUNCIL PROCEDURE RULE NO 11**

The Committee was informed that no questions from Members of the Council had been received.

**MATTERS DELEGATED TO COMMITTEE**

EDS/06 **CORPORATE PLAN 2020-2024: PERFORMANCE REPORT (2022-2023 QUARTER 4 – 1 APRIL TO 31 MARCH)**

The report was presented to the Committee by the Strategic Director (Service Delivery) highlighting the 17 measures for the Committee. It was reported that there had been significant progress for the year 2022-23 with ten measures on track and seven in red.

The Strategic Director (Service Delivery) referenced additional information regarding the highest level of Planning applications received during the year 2022-23 and the steps that would be taken to clear the backlog.

The Chair was pleased to receive the progress report. Members congratulated the team and specifically the report on fly tipping, although concerns were voiced around the seven red measures. Members requested further information from Operational Services on recycling, waste and composting.

The Strategic Director (Service Delivery) informed the Committee that the reduction in performance for recycling related to garden waste which had been impacted by the dry weather and would be reviewed.

**RESOLVED:**

***1.1 The Committee approved progress against performance targets set out in the Corporate Plan 2020 - 2024.***

***1.2 The Risk Register(s) for the Committee's services were reviewed.***

EDS/07 **THE DEPARTMENT FOR LEVELLING UP, HOUSING AND COMMUNITIES CONSULTATION ON THE PROPOSED INFRASTRUCTURE LEVY**

The report was presented to the Committee by the Planning Policy Officer. It was explained that the consultation response was to consider a single levy to generate more funds for infrastructure by collecting contributions at the end of a development.

Members agreed the report was good but highlighted four key responses for discussion. Members agreed to no changes to question 28; a change

to disagree for residential annexes at question 38; no changes to question 40 and to reference retrospective applications in question 41.

The Chair summed up by agreeing with Members that it was an excellent report and expressed his understanding of Members points of view and comments. The Chair confirmed that over recent years the collection of Section 106 Agreement contributions from developers had been very well executed.

**RESOLVED:**

***1.1 The Committee approved the submission of a response to the consultation in line with officer recommendations as detailed in Appendix 1 to the report.***

***1.2 The Committee approved to amend the consultation responses to Question 38 to remove 'agree' and replace with 'disagree' and Question 41 to include reference to retrospective applications.***

EDS/08 **EAST MIDLANDS AIRPORT DRAFT NOISE ACTION PLAN**

The Planning Delivery Team Leader presented the report to Members and confirmed that the consultation would close on 31 July.

**RESOLVED:**

***1.1 The Committee approved that a cross-party Member Working Panel be established with authority for determining a Committee resolution in response to the forthcoming East Midlands Airport Draft Noise Action Plan consultation and that delegated authority was given to the Chief Executive and the Chair of Environmental and Development Services to approve the response.***

***1.2 The Committee approved that the panel composition would be the Chair and Vice-Chair of the Environmental and Development Services Committee, a Member of the Leading Group from the Melbourne Ward, a Member of the opposition Group from the Melbourne Ward with an opposition substitute from the Aston Ward.***

EDS/09 **THE DEPARTMENT FOR LEVELLING UP, HOUSING AND COMMUNITIES CONSULTATION ON ENVIRONMENTAL OUTCOMES REPORT**

The Planning Delivery Team Leader presented the report highlighting a new system for Outcome Reports based on a Member working panel. One of the key changes was the removal of economic focus on post development enhancements and streamlining to reduce bureaucracy. The consultation consisted of 26 questions with responses detailed in Appendix A to the report.

Members considered the responses and raised concern regarding a resource issue until data categories had been confirmed.

The Planning Delivery Team Leader informed the Committee that the Government department would determine the data format and standards required and that additional resources would be considered.

**RESOLVED:**

***The Committee approved the submission of a response to consultation in line with officer recommendations as detailed in Appendix 1 to the report.***

EDS/10 **COMMITTEE WORK PROGRAMME**

The Strategic Director (Corporate Resources) presented the report to the Committee.

**RESOLVED:**

***1.1 That the Committee considered and approved the updated work programme.***

EDS/11 **LOCAL GOVERNMENT ACT 1972 AS AMENDED BY THE LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985**

**RESOLVED:**

***That, in accordance with Section 100(A)(4) of the Local Government Act 1972 (as amended), the press and public be excluded from the remainder of the Meeting as it would be likely, in view of the nature of the business to be transacted or the nature of the proceedings, that there would be disclosed exempt information as defined in the paragraphs of Part 1 of the Schedule 12A of the Act indicated in brackets after each item.***

**MINUTES**

***The Exempt Minutes of the Meetings held on 22 September 2022, 10 November 2022 and 26 January 2023 were received.***

**EXEMPT QUESTIONS BY MEMBERS OF THE COUNCIL UNDER COUNCIL PROCEDURE RULE NO 11**

***The Committee was informed that no exempt questions from Members of the Council had been received.***

The meeting terminated at 19:00 hours

COUNCILLOR S TAYLOR

CHAIR

ENVIRONMENTAL AND DEVELOPMENT SERVICES  
COMMITTEE

10 August 2023

OPEN

**PRESENT:**

**Labour Group**

Councillor S Taylor (Chair) and Councillor K Storey (Vice-Chair) and Councillors S Harrison, (substituting for Councillor Archer), I Hudson, J Jackson, V Redfern, B Stuart and A Tilley.

**Conservative Group**

Councillors M Fitzpatrick (substituting for Councillor J Lowe), K Haines and P Watson.

**Liberal Democrats**

Councillor G Andrew

**Non-Grouped**

Councillor A Wheelton

EDS/14 **APOLOGIES**

The Committee was informed that apologies had been received from Councillor A Archer (Labour Group) and Councillor J Lowe (Conservative Group).

EDS/15 **DECLARATIONS OF INTEREST**

The Committee was informed that no declarations of interest had been received.

EDS/16 **QUESTIONS FROM MEMBERS OF THE PUBLIC UNDER COUNCIL PROCEDURE RULE NO 10**

The Committee was informed that no questions from Members of the Public had been received.

EDS/17 **QUESTIONS BY MEMBERS OF THE COUNCIL UNDER COUNCIL PROCEDURE RULE NO 11**

The Committee was informed that no questions from Members of the Council had been received.

**MATTERS DELEGATED TO COMMITTEE****EDS/18 CORPORATE PLAN 2020-2024: PERFORMANCE REPORT (2023-2024 QUARTER 1 – 1 APRIL TO 30 JUNE)**

The Strategic Director (Service Delivery) presented the report and highlighted the planning application figures.

Members enquired regarding appointments to vacant positions in the planning service, numbers of planning applications still to be determined and the timescale to clear the backlog.

The Head of Planning and Strategic Housing confirmed that the vacant posts had been recruited to and that there were currently 400 applications that were out of time. He anticipated that the backlog would be cleared by the end of the year.

Members requested further detail in the planning application figures reported to demonstrate progress made to clear the backlog.

Clarification was also requested regarding the additional funding provided for the planning service. The Strategic Director (Corporate Resources) confirmed that a total of £400,000 was anticipated from additional funding agreed by the Council and the anticipated income received from the increase in planning fees.

The Head of Planning and Strategic Housing clarified how the Council intended to implement biodiversity net gain and the decision process for planning applications for residential developments on commercial/employment sites.

**RESOLVED:**

- 1.1 *The Committee approved progress against performance targets set out in the Corporate Plan 2020 - 2024.***
- 1.2 *The Committee reviewed the Risk Register(s) for the Committee's services.***

**EDS/19 ANNUAL ENFORCEMENT AND COMPLIANCE REPORT**

The Head of Environmental Services presented the report and highlighted the impact of COVID on the service and the trends in respect of complaints over the last year. The increase in complaints concerning persons with mental health issues were noted.

Members commended the report and the work that had been undertaken.

Members enquired whether air pollution complaints had increased and the Council's actions in relation to dog fouling.

The Head of Environmental Services informed the Committee that air pollution complaints were relatively static save for an increase during COVID arising out of complaints regarding bonfires. The Council's powers in relation to dog fouling was further explained.

Members expressed support for the "we are watching you" campaign and noted the success of publicity following successful prosecutions.

Members requested that the Head of Environmental Services review the enforcement of petrol and diesel vehicles parked in electric charging points in the Council's car parks.

### **RESOLVED:**

***1.1 The Committee noted the content of the report and approved that the Council used its regulatory power in a way that was proportionate to the demand for all regulatory services it provided.***

## EDS/20 **SHARED PROSPERITY FUND – VERBAL UPDATE**

The Head of Growth and Economic Development gave the following verbal update-

### **Shared Prosperity Fund – End of Year 1 Update (31 March 2023)**

South Derbyshire had been allocated £2,156,374 through the Shared Prosperity Fund over a three-year period 2022/23-2024/25. The Government delayed the anticipated start of the programme nationally. £236,441 of expenditure was undertaken in Year 1 (2022/23). The capital spend target was met. There was a revenue underspend of £25,255 which the Government agreed could be carried forward to Year 2 (2023/24).

The Investment Plan for South Derbyshire was approved by Government, envisaging a package of measures:

### **Communities and Place**

- Town centre public realm works were underway in Swadlincote. The Delph market square was undergoing refurbishment, including the installation of additional bollards to prevent unwanted vehicle access onto the square and the resurfacing of the main square and restoration of the Town Hall steps. The redevelopment of the vacant/derelict Bank House/Sabine's Yard site was also underway to create additional free public car parking and a pocket park on Belmont Street.

- The planning of additional promotional and community activities, including visitor promotion, events and activities was underway, together with the appointment of an additional Community Safety Enforcement Officer dedicated to addressing environmental crime and anti-social behaviour issues in town centres.
- A community grant fund for third sector organisations, voluntary and community groups had been established to offer grants of between £2,000 and £25,000 (up to 80% of total project costs). Projects that could be supported include property improvements, energy efficiency and generation measures, green space enhancements, or arts, cultural, tourism and heritage initiatives.

### **Supporting Local Business**

- A grant scheme for smaller businesses had been established, open to sole traders, partnerships and limited companies with less than 50 employees. Grants of £1,000 - £50,000 (up to 80% of the total project costs) were available. Projects that could be supported include purchase of equipment, the introduction of new products/services or processes/techniques, starting or growing exports, and initiatives to increase productivity.
- The Derbyshire business start-up programme was to be extended. The scheme was open to people who were starting their own business or had set up a business in the last 12 months. It offered expert advice, together with grants of up to £10,000.
- Proposals were being drawn up to deliver the following programmes:
  - A business support programme, including workshops, events, and specialist advice.
  - Energy audits and a carbon reduction grant scheme for smaller enterprises.

### **People and Skills**

- Proposals were being drawn up to deliver the following programmes:
  - Employability activities to support those furthest from the labour market.
  - Supporting aspirations amongst young people in order to raise social mobility (Year 3 only).
  - Addressing skills gaps through training courses or learning bursaries (Year 3 only).

## **Rural Economic Prosperity Fund**

South Derbyshire had latterly been awarded £400,000 from the Rural Economic Prosperity Fund (REPF), which would operate alongside the Shared Prosperity Fund during Years 2 and 3 (financial years 2023/24 and 2024/25). The Fund would provide grants to organisations located in the Government's designated rural areas of South Derbyshire.

Rural areas often faced specific challenges including lower productivity rates, poorer connectivity and poorer access to key services.

The Rural Fund was integrated into the UK Shared Prosperity Fund (UKSPF) which supported productivity and prosperity in places that need it most. The Rural Fund was a rural top-up to UKSPF allocations. It would support activities that specifically addressed the particular challenges rural areas face. It would be complementary to funding used to support rural areas under the UKSPF. The Rural Fund aimed to improve productivity and strengthen the rural economy and rural communities.

Any organisation with legal status could apply for funding to deliver a Rural Fund intervention. Which may include local authorities; public sector organisations; higher and further education institutions; private sector companies; voluntary organisations; registered charities; and, arms-length bodies of Government.

The Rural Fund provides capital funding to spend on lasting assets such as a building or equipment that:

- support rural businesses to develop new products and facilities that would be of wider benefit to the local economy. This would include farm businesses looking to diversify income streams. (£200,000)
- support new and improved community infrastructure, providing essential community services and assets for local people and businesses to benefit the local economy. (£200,000)

The Rural Fund allocation for third sector organisations would be awarded to projects in the designated rural areas with a maximum grant of £25,000 per project and a limit of one award per organisation/venue during the lifetime of the scheme, plus additional weighting given in the assessment process to projects located in Lower Super Output Areas that have higher Index of Multiple Deprivation 2019 scores and/or that had received lesser amounts of Community Partnership Fund monies in the past 3 years.

Members thanked the Head of Growth and Economic Development and commended the update and the work that had been undertaken.

EDS/21 **COMMITTEE WORK PROGRAMME**

The Strategic Director (Corporate Resources) presented the report to the Committee.

**RESOLVED:**

***1.1 The Committee considered and approved the updated work programme.***

EDS/22 **LOCAL GOVERNMENT ACT 1972 AS AMENDED BY THE LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985**

**RESOLVED:**

***That, in accordance with Section 100(A)(4) of the Local Government Act 1972 (as amended), the press and public be excluded from the remainder of the Meeting as it would be likely, in view of the nature of the business to be transacted or the nature of the proceedings, that there would be disclosed exempt information as defined in the paragraphs of Part 1 of the Schedule 12A of the Act indicated in brackets after each item.***

**EXEMPT QUESTIONS BY MEMBERS OF THE COUNCIL UNDER COUNCIL PROCEDURE RULE NO 11**

***The Committee was informed that no exempt questions from Members of the Council had been received.***

The meeting terminated at 19:10 hours.

COUNCILLOR S TAYLOR

CHAIR

<b>REPORT TO:</b>	<b>ENVIRONMENTAL AND DEVELOPMENT COMMITTEE</b>	<b>AGENDA ITEM: 6</b>
<b>DATE OF MEETING:</b>	<b>21 SEPTEMBER 2023</b>	<b>CATEGORY: DELEGATED</b>
<b>REPORT FROM:</b>	<b>STRATEGIC DIRECTOR (CORPORATE RESOURCES)</b>	<b>OPEN</b>
<b>MEMBERS' CONTACT POINT:</b>	<b>CHARLOTTE JACKSON</b> <a href="mailto:Charlotte.jackson@southderbyshire.gov.uk">Charlotte.jackson@southderbyshire.gov.uk</a>	<b>DOC:</b> s/finance/committee/2023-24/September
<b>SUBJECT:</b>	<b>BUDGET SETTING APPROACH 2024-25</b>	
<b>WARD(S) AFFECTED:</b>	<b>ALL</b>	<b>TERMS OF REFERENCE: FM08</b>

## **1.0 Recommendations**

1.1 That the Committee notes the budget setting approach within the report and Members provide feedback accordingly to the Strategic Director (Corporate Resources).

## **2.0 Purpose of the Report**

2.1 To consult Members on the approach for setting the 2024/25 budget.

## **3.0 Detail**

### **INTRODUCTION**

3.1 This report seeks feedback from Members on the proposed approach for setting the Council's budget for 2024/25, including any budget proposals Members wish to instruct officers to consider and develop.

### **BACKGROUND**

3.2 The Local Government Act 1992 requires the councils that are billing authorities complete and approve their budgets and set a council tax before 11 March immediately prior to the start of the financial year on 1 April.

3.3 Officers have now started to review the detailed income and expenditure budgets by service for the forthcoming 2024/25 financial year across all its operations – the General Fund and Housing Revenue Account (HRA) revenue accounts and the General Fund and HRA Capital Programmes.

- 3.4 The Strategic Director (Corporate Resources) has set out some early budget setting principles for services to work with (see below).
- 3.5 The purpose of this report is to consult Members on any further features or principles they would like to set as part of determining next year's budget, to ensure that proposals are considered in the context of the overall budget position and affordability. The early discussion also provides an opportunity for Members to instruct officers to consider and develop budget proposals.

## **KEY PRINCIPLES TO DEVELOPING BUDGET PROPOSALS**

- 3.6 The three key principles set out to Managers in preparing their budgets for next year are:

**3.6.1 Budgets should support Service Plan and the Council Plan** - Overall, services should align with Service Plans and the Council Plan. This is a fundamental principle to ensure that appropriate funding is in place. It will also reduce and remove the need for further reports to committee for additional funding requests, unless there are specific requests from members on this or there are other requirements around procurement or other approval considerations.

**3.6.2 Revenue investment should be based on demonstratable need or be self-funding** - This means that any cost-pressures (such as inflation pressures on supplies, services, and contracts), additional staff or reductions in income due to lower demand or reduced fees, should, insofar as is possible, be "self-funding". This means services should try as far as is reasonably practical to off-set increases in financial resources by making savings in other areas or alternatively, additional revenue investments should be fully demonstrated.

Overall, proposals will need to demonstrate an evidence-based business case which sets out the service need and how additional revenue funding will seek to meet that need, and where possible, reduce ongoing expenditure or increase income in other areas.

**3.6.3 Capital growth will be considered based on need and innovation meaning it is essential for the maintenance of service delivery or will improve service delivery by way of revenue improvement** - Ideally, if we are creating or enhancing an asset, it should be because it will improve the council's financial position through reducing spend or generating income, or it must be because we need to do this to maintain services.

Again, this requires services to document and demonstrate a sound business case and evidence service investment need.

## THE BUDGET SETTING APPROACH

- 3.7 There are several other features of the budget process that are different this year or that are important for members to have an understanding of and these are set out below.
- 3.8 The first key feature is that the budget will be set using an “incremental budgeting” approach. This is where the current year’s budget is taken forward into the new year, adjusted for changes presented to members and subsequently approved.
- 3.9 As such, all budgetary changes, will be set out in reports. This will be the case for individual changes above a de-minimis level of £5k, but for amounts lower than £5k, all service area changes will be consolidated and reported as “de-minimis changes”, by directorate.
- 3.10 Proposals around additional staffing resource will be set out clearly so that proposed increases to the establishment are well understood.
- 3.11 Similarly, proposals around variations to fees and charges will set out the basis of any changes and the resultant impact to income.
- 3.12 It is envisaged that, since proposals are to be presented in a way that identifies a clear business need, there will be a forthcoming reduction in any need for further reports to committee for additional funding requests. However, it is recognised that there may be specific requests from committees to sign off at future proposal milestones, receive updates on the progress of new initiatives, or other requirements, such as procurement award sign off.
- 3.13 To ensure effective financial scrutiny, early member engagement on the budget is being undertaken, starting with this context setting report. Engagement with each of the committees is proposed to be held with Environmental and Development Services Committee (ED&S) on 21 September 2023, Housing and Community Services Committee (H&CS) on 28 September 2023, Finance and Management Committee (F&MC) on 5 October 2023 and Overview and Scrutiny (O&SC) on 11 October 2023.
- 3.14 A draft budget position will then be prepared and presented to F&MC at its 23 November meeting. The Committee will agree the draft budget for approval to commence the public and statutory consultation.
- 3.15 During January, the draft budget will be presented to policy committees and O&SC. The reports will present the consolidated draft budget and individual proposals to give each policy committee the holistic view of the Council’s finances and affordability considerations, as well as the committee specific detail.
- 3.16 In the past, public consultation has been achieved through Area forums. This year, the process will be expanded to include online consultation, to run for 6 weeks. Feedback from the consultations will be reported to F&MC at its meeting on 15 February, alongside feedback and changes made as a result of policy

committee review. F&MC will review the final proposed budget considering consultation feedback and make its recommendations to Council for final approval.

## MEDIUM TERM FINANCIAL PLANNING

- 3.17 The Council’s current Medium Term Financial Plan (MTFP) includes provision for growth and inflationary demands. The assumptions and associated financial risks are considered as a worst-case scenario and there are recurring budget gaps being met by reserves over the life of the plan.
- 3.18 As the budget is developed, the plan will be reviewed and renewed to align with the new proposed budget from 2024. The review will include the assessment of all assumptions that drive the future financial forecasts in the plan as well as the creation of the worst- and best-case scenarios against a “base case” to set out the most likely outcome.
- 3.19 A new Medium Term Financial Strategy will also be developed later into the budget setting timetable and presented alongside the budget for approval in February. This overarching strategy will consider the future funding expectations and opportunities for increasing the Council’s self-sufficiency in the light of diminishing central government grants and an uncertain future funding outlook and a cycle of recurrent 1-year local government funding settlements, whilst ensuring the Council can continue to fund and deliver excellent services.

## TIMETABLE

3.20 The proposed timetable is as follows:

Date & Committee	Milestone
21 September – E&DS 28 September – H&CS 5 October – F&MC 11 October – O&SC	Consultation on budget setting principles/values and budget changes/proposals for development
<i>September – November</i>	<i>Budgets scoped and reviewed by officers and Leadership Team</i>
23 November – F&MC	Consideration of consolidated budget and individual proposals Approval to consult
4 January – E&DS 8 January – H&CS 11 January – F&MC 17 January – O&SC	Committee review of consolidated budgets and individual proposals relevant to Committee service budget <b>Draft MTFs presented to O&amp;SC</b>
24 November – end January	Statutory and public consultation with ratepayers (businesses) and residents

15 February – F&MC	Review of final consolidated budget, review of consultation responses <b>Draft MTFS</b>
28 February – Council	Final approval of Budget and Council Plan <b>Final MTFS</b>

## **SUMMARY**

3.21 Feedback is sought on the overall approach and main features of the budget setting timetable, the key principles, the proposed public consultation and any other areas of the budget Member wish to see developed.

### **4.0 Financial Implications**

4.1 None currently.

### **5.0 Corporate Implications**

#### **Employment Implications**

5.1 None.

#### **Legal Implications**

5.2 None.

#### **Corporate Plan Implications**

5.3 None

#### **Risk Impact**

5.4 None

### **6.0 Community Impact**

6.1 None currently.

#### **Equality and Diversity Impact**

6.2 None.

#### **Social Value Impact**

6.3 None.

#### **Environmental Sustainability**

6.4 None.

## 7.0 **Background Papers**

7.1 None

<b>REPORT TO:</b>	<b>ENVIROMENTAL AND DEVELOPMENT SERVICES</b>	<b>AGENDA ITEM: 7</b>
<b>DATE OF MEETING:</b>	<b>21 SEPTEMBER 2023</b>	<b>CATEGORY: RECOMMENDED</b>
<b>REPORT FROM:</b>	<b>STRATEGIC DIRECTOR (SERVICE DELIVERY)</b>	<b>OPEN</b>
<b>MEMBERS' CONTACT POINT:</b>	<b>CHRISTOPHER WORMAN PARKS AND GREEN SPACES MANAGER <a href="mailto:chris.worman@southderbyshire.gov.uk">chris.worman@southderbyshire.gov.uk</a></b>	<b>DOC:</b>
<b>SUBJECT:</b>	<b>WOODVILLE LINK ROAD BIODIVERSITY NET GAIN PROJECT – PROGRESS UPDATE</b>	
<b>WARD (S) AFFECTED:</b>	<b>ALL WARDS</b>	<b>TERMS OF REFERENCE: (EDS)</b>

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## **1.0 Recommendations**

1.1 That the Committee acknowledges the progress of the Woodville Link Road Biodiversity Net Gain project during 2022 and the outstanding works to be completed.

## **2.0 Purpose of the Report**

2.1 To provide a summary of progress during 2022 on the Woodville Link Road Biodiversity Net Gain project and justification for changes from the original works specification.

2.2 To provide a summary of, and recommendations for, outstanding works.

## **3.0 Executive Summary**

3.1 As part of the Woodville Link Road scheme, the Council offered three of its sites for biodiversity improvements to offset the biodiversity impact of the scheme. This was agreed by Committee and a monetary contribution of £147, 000 was paid to the Council by County to implement the improvements and manage and monitor the sites for a period of 32 years.

3.2 The three green space sites chosen for the improvements were:

- Site 1 – Sandholes, Midway
- Site 2 – Unnamed grassland, George Street, Church Gresley (now called 'Old Hall Meadow')
- Site 3 - Birch Plantations surrounding Salts Meadow (Swadlincote Woodlands)

- 3.3 A Biodiversity Net Gain report was produced in June 2020 by Derbyshire Wildlife Trust to support the project and outlines the work specifications – see Appendix 1.
- 3.4 The relevant committee report approving the project in August 2020 is provided in Appendix 2.
- 3.5 There was a delay to the implementation of the project due to the ongoing Covid pandemic.
- 3.6 The project has in 2022 been led by the Council's new Biodiversity Officer. The 2022 project work was tendered to three contracting companies, subsequently awarded to Heaths Contractors (a local firm).
- 3.7 This report sets out the work completed to date for each site, constraints encountered and changes to the original work specification by DWT and outstanding works which are still to be completed with recommendations.

#### **4.0 Site 1 – Sandholes, Midway**

##### **Works Proposed (DWT Report)**

- 4.1 Sow wildflower seeds over existing grassland area - 2ha.
- 4.2 Subsequently mow grassland once annually removing all grass arisings (>32 years).
- 4.3 Monitor success of improvements, report (over the 32-year period).

##### **Works Completed 2022**

- 4.4 Sowing of wildflower seeds over existing grassland area – approx. 0.6ha.

##### **Communications**

- 4.5 Approximately a week prior to works starting, a release was issued on the Council's social media outlets with a link to the Council's website explaining the works.
- 4.6 Signs were also installed on the site to provide users and residents information on the upcoming works.
- 4.7 The Parks and Green Spaces department are not aware of any comments or questions submitted to the Council in respect of works.

##### **Changes to DWT Works Specification**

- 4.8 Approximately 0.6ha of the 2ha Sandholes site was sown with wildflowers in October 2022.
- 4.9 As Sandholes is a well-used area of public open space, it was decided that a phased approach to sowing would be more acceptable to the public due to reduced levels of ground disturbance and subsequent wildflower development, in comparison to sowing across the whole site in a single operation. Additionally, this approach allows for the success of each phase of sowing to be evaluated and changes made in subsequent

sowing years, as necessary. The justification for the phased approach is further set out below.

- 4.10 The original DWT specification to utilise a chain harrow to break up the sward and allow for better seed-soil contact and reduce competition from grasses was ineffective, as was the use of a spike harrow. Despite harrowing the sward in several different directions repeatedly, both harrow types resulted in minimal effect to the sward surface.
- 4.11 The alternatives were to use a power harrow or spray off the required sowing areas with herbicide.
- 4.12 Whilst a power harrow would have broken up the sward to allow for good soil-seed contact, this would have caused significant disturbance to the soil surface and greatly increased the potential for injurious weeds to develop and outcompete the wildflowers in the spring.
- 4.13 Therefore, it was decided that herbicide treatments to prevent competition from grasses and a disc-overseeder to drill seeds directly but shallowly into the soil was the preferred option to maximise the potential for successful wildflower germination. The contractor had noted better results with this method on other sites which would also cause minimal disturbance to the soil surface and therefore the potential for injurious weeds to develop.
- 4.14 Due to utilising a disc-overseeder, the wildflowers had to be sown in linear strips. The location of these strips are marked on a plan in Appendix 3, which is additionally intended to act as a guide for the sowing of wildflowers in subsequent years.
- 4.15 The DWT wildflower seed specification was changed through advice from Naturescape Seeds Ltd (based in Nottinghamshire), to a seed mix more suitable to the specific conditions of the site which would maximise the potential of germination success and long-term wildflower vitality. The Biodiversity Officer undertook soil samples of the site and provided Naturescape with existing species-lists, site conditions and photographs to allow a bespoke neutral-soil seed mix to be developed. A bespoke acid-soil seed mix was also developed for part of the northern area of the site, this unique habitat type was not identified in the original DWT report. The wildflower seed specifications are provided in Appendix 5.

## **Outstanding Works**

- 4.16 Sow remaining wildflowers, in a phased approach (approx. 1.4ha).
- 4.17 Mow grassland once annually removing all grass arisings (>32 years).
- 4.18 Monitor success of improvements, report (over the 32-year period).

## **Recommendations**

- 4.19 Sowing of wildflowers should be undertaken in the autumn only. Important annual wildflower species (i.e. hay rattle) require winter frosts for spring germination.
- 4.20 The development of wildflowers should be monitored during spring and summer 2023 in the sowing strips, with any injurious weeds removed wherever possible should these persist.

- 4.21 The use of other ground preparation measures inclusive of herbicide could be utilised, such as power harrowing and re-trailing chain or spike harrow, which may not have been successful in 2022 due to the summer drought and hardness of the land. Observations from the monitoring of wildflower development in 2023 may also guide changes to the future approach.
- 4.22 The wildflower planting plan provided in Appendix 3 should be utilised to guide subsequent wildflower sowing. It is recommended as a minimum that wildflower sowing is phased over two more years (i.e. 2023 and 2024) to reduce ground disturbance and allow for changes and alterations to the approach.
- 4.23 It may be advisable in subsequent sowing years to add a range of native grass species to the sowing mix particularly if the herbicide preparation approach is continued, as the supplied mixes are 100% wildflower (seed bags are stored in the Parks office). Naturescape Ltd would be able to provide advice on grass species mix and percentages.
- 4.24 The mowing of the grass sward and removal of arisings should be undertaken prior to sowing of wildflowers. All monitoring data should be appropriately recorded and saved for future reporting. Monitoring could be undertaken by volunteers.

## **5.0 Site 2 – Old Hall Meadow, George Street, Church Gresley**

### **Works Proposed (DWT Report)**

- 5.1 Sow wildflower seeds over existing grassland area – 1.3ha.
- 5.2 Subsequently mow grassland once annually removing all grass arisings (>32 years).
- 5.3 Monitor success of improvements, report (over the 32-year period).

### **Works Completed 2022**

- 5.4 Sowing of wildflower seeds over existing grassland area – approx. 0.5ha.

### **Communications**

- 5.5 The communications plan as previously outlined was utilised for both the Sandholes and Old Hall Meadow sites.

### **Changes to Works Specification**

- 5.6 For the reasons described for the Sandholes site, the phased herbicide application and disc-overseeding approach was utilised for the wildflower sowing at Old Hall Meadow. A bespoke wildflower seed mix was also developed for Old Hall Meadow with Naturescape Ltd.
- 5.7 A wildflower planting plan is provided in Appendix 4 for Old Hall Meadow and the seed mix specification is outlined in Appendix 5.

## **Outstanding Works**

- 5.8 Sow remaining wildflowers in a phased approach (approx. 0.8 ha).
- 5.9 Mow grassland once annually removing all grass arisings (>32 years).
- 5.10 Monitor success of improvements, report (over the 32-year period).

## **Recommendations**

- 5.11 The recommendations set out the Sandholes site should be utilised for Old Hall Meadow.
- 5.12 It should be noted that the chain harrowing specification as outlined in the DWT report is highly unlikely to be effective at Old Hall Meadow irrespective of seasonal hardness of ground, due to the large and extensive grass tussocks present.

## **6.0 Site 3 – Birch Plantations, Salts Meadow, Swadlincote Woodlands**

### **Works Proposed (DWT Report)**

- 6.1 Woodland thinning, wildflower and bulb planting, tree and shrub planting – 1.2ha.
- 6.2 On-going woodland management, 5-year coppice cycle (>32 years).
- 6.3 Monitor success of improvements, report (over the 32-year period).

### **Works Completed 2022**

- 6.4 Woodland thinning, wildflower and bulb planting, tree and shrub planting – 1.2ha.

### **Works Overview**

- 6.5 The woodland thinning was undertaken by a local contractor in late-winter 2021 in accordance with the DWT specifications.
- 6.6 The wildflower and bulb planting were subsequently undertaken by the Council's Parks and Green Spaces department and The Conservation Volunteers in December 2021.
- 6.7 A range of woodland wildflowers and bulbs were planted – the planting stock supplied by Naturescape Ltd is listed in Appendix 6. The planting glades were surveyed by the Biodiversity and Park Life Officer in spring 2022 – over 2000 bluebells were in full flower amongst a range of other woodland plants.
- 6.8 The planting glades were subsequently cleared of long grasses and self-set trees by The Conservation Volunteers in September 2022, to promote new woodland wildflower in the spring of 2023.
- 6.9 Over 200 trees and shrubs were planted in the woodland by The Conservation Volunteers in December 2022 – the planting stock supplied by Coles Ltd is listed in Appendix 6. This was the lower end of the DWT specification (200-400 trees) but was felt sufficient for the planting areas available.

## **Outstanding Works**

- 6.10 On-going woodland management, 5-year coppice cycle (>32 years).
- 6.11 Monitor success of improvements, report (over the 32-year period).

## **Recommendations**

- 6.12 The wildflower glades will need to be cut and cleared of vegetation once every year in the autumn to promote new wildflower growth each spring. The glades have been added to the Council's register of grasslands sites requiring annual management.
- 6.13 Planted trees and shrubs should be checked annually with weeds suitably suppressed ideally through clearance by volunteers or as a last resort by herbicide applications. Any dead trees or shrubs should be replaced to specification. Guards should be removed and recycled once trees and shrubs have established i.e. after 4-5 years.
- 6.14 On-going woodland management i.e. coppicing could be undertaken by volunteers in accordance with the DWT specifications.
- 6.15 All monitoring data should be appropriately recorded and saved for future reporting. Monitoring could be undertaken by volunteers.

## **7.0 Financial Implications**

- 7.1 The Woodville Link Road Biodiversity Net Gain project has been funded through contributions from County therefore there are no financial implications directly arising from the report.

## **8.0 Corporate Implications**

### **Employment Implications**

- 8.1 There are no employment implications arising from this report.

### **Legal Implications**

- 8.2 The project contributes to Council's 'Biodiversity Duty' under the Environment Act 2021 to 'conserve' and 'enhance' biodiversity.

### **Corporate Plan Implications**

- 8.3 The project contributes to the Corporate Plan Priorities and Key Aims including:

#### **Our Environment**

- a. Improve the environment of the district
  - i. Enhance biodiversity across the district
- b. Enhance the attractiveness of South Derbyshire
  - i. Improve public spaces to create an environment for people to enjoy

## **9.0 Risk Impact**

9.1 The project was a condition of planning consent for the Woodville Link Road scheme, therefore by implementing and continuing project works the requirements of the condition will be met.

## **10.0 Community Impact**

10.1 The project will provide a positive contribution to local communities through investment in green spaces, making the green spaces more attractive to visit and increasing opportunities for the public to connect with nature and improve well-being.

## **11.0 Equality and Diversity Impact**

11.1 None known.

## **12.0 Social Value Impact**

12.1 See Community Impact.

## **13.0 Environmental Sustainability**

13.1 Grass arisings cut from the sites prior to sowing were delivered to a local farmer for winter silage. A local contractor was utilised to undertake the wildflower sowing works. Naturescape Ltd (Nottinghamshire) and Coles Nurseries (Leicestershire) supplied wildflower seeds and trees/shrubs – most of the stock is grown and developed on their sites.

### **Attached:**

Appendix 1: DWT Report Woodville Link Road BNG  
Appendix 2: Committee Report Woodville Link Road BNG  
Appendix 3: Sandholes Wildflower Sowing Plan 2022  
Appendix 4: Old Hall Meadow Wildflower Sowing Plan 2022  
Appendix 5: Wildflower Sowing Mixtures  
Appendix 6: Woodland Planting Lists

**END**



**Derbyshire**  
Wildlife Trust

# **WOODVILLE LINK ROAD BIODIVERSITY NET GAIN REPORT**

**July 2020**

**Author: Molly Gorman**

**Reviewer: Matt Buckler**

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## Summary

This report, prepared by Derbyshire Wildlife Trust, provides a supplementary Biodiversity Net Gain assessment of proposed habitat enhancement measures for off-site receptor areas in order to compensate for the identified biodiversity net loss of the Woodville Link Road scheme. A total of six sites were surveyed for their potential to provide enhancements, with three sites identified as being the most suitable in terms of amount of units delivered in the biodiversity metric, existing site tenure, enhancement feasibility, location and strategic position. The three sites; Sandholes, unnamed grassland at Church Gresley and Salts Meadow plantations have been assessed to have the potential to provide 23.9 habitat units through grassland and woodland enhancement measures, providing the scheme with suitable off-site compensation and no net biodiversity loss, satisfying condition 5 of the planning application. The capital works and 32 years of management has been estimated at £143,307, which is highly cost-effective, and the broader benefits of this approach, including heightened physical and mental health of the local community, good quality sites within dispersal range of lost habitats and potential for links with other conservation strategies, are extremely valuable.

# 1 Introduction

This report has been prepared by Derbyshire Wildlife Trust (DWT) on behalf of South Derbyshire District Council (SDDC) in response to the Woodville Link Road Ecological Design Strategy<sup>1</sup>. The strategy sets out the results of a Biodiversity Net Gain (BNG) assessment of on-site post development habitats for the Woodville Link Road (the 'scheme') in order to satisfy condition 5 of the planning application to '*ensure the proposals do not result in a net loss of biodiversity*' and a statutory requirement in the National Planning Policy Framework (NPPF, 2019). The initial calculations carried out by AECOM and presented within the design strategy concluded that the current scheme for on-site habitats is predicted to result in a 66.83% net loss of biodiversity area-based habitat units and a 2030% net gain for linear hedgerow units.

## 1.1 Aims

The aim of this report is to provide a supplementary BNG assessment of proposed habitat enhancement measures for off-site receptor areas in order to compensate for the identified biodiversity net loss within the scheme. This will include a site selection rationale, off-site baseline habitat data, habitat enhancement rationale, specifications for implementation and management, and an estimation of costs.

## 1.2 Context

The Woodville Link Road scheme is proposed on a former industrial site located 1.5 miles east of Swadlincote in South Derbyshire. The site comprises an industrial area, plantation woodland, restored grassland, ditches and hedgerows. The scheme will result in the loss of broad-leaved woodland, semi-improved grassland and scrub.

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<sup>1</sup> Woodville Link Road Ecological Design Strategy (2020) AECOM.

## 2 Methodology

### 2.1 Receptor Site Selection

Sites were selected based on their existing value, condition and proximity to the scheme in order to mitigate impacts of the scheme within the local area. SDDC owned sites were favoured to negate the requirement for land acquisition. A total of six SDDC sites were surveyed for their suitability to be included within the schemes metric.

### 2.2 Survey data

The receptor sites were surveyed by the author between the 8th and 18th May 2020 using Phase 1 Survey methods and the UK Habitat Classification. Vascular plant nomenclature follows Stace (2019)<sup>2</sup> and assessment of abundance for plants was made using the DAFOR scale:

- D – Dominant
- A – Abundant
- F – Frequent
- O – Occasional
- R – Rare
- L – Locally (e.g. LF Locally Frequent)

Assessment of the habitat condition was undertaken during the survey based on professional judgement and the condition assessment criteria outlined in Natural England's metric condition tables (technical supplement<sup>3</sup>). Good, Moderate and Poor conditions are assigned based on the number of criteria the habitat meets and the presence or absence of undesirable species.

### 2.3 Biodiversity Net Gain Calculations

The initial on-site post-development habitat calculations were carried out by AECOM using the Defra Biodiversity Metric 2.0. This calculates the overall loss or gain of biodiversity projects by assessing the distinctiveness (type of habitat and its value), condition, extent, ecological connectivity and strategic significance of habitats.

The off-site baseline habitat and enhancements have also been assessed using the Defra Metric 2.0 to give the overall result in the schemes biodiversity calculation.

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<sup>2</sup> Stace, C.A (2019) New Flora of the British Isles. 4<sup>th</sup> Ed. Stowmarket, UK. C&M Floristics.

<sup>3</sup> Natural England (2019) The Biodiversity Metric 2.0 – User Guide and Technical Supplement – Beta Test.

## 2.4 Constraints

The baseline habitat survey of receptor site 1 was undertaken at the beginning of May which is considered slightly early for a grassland survey. Whilst the majority of species will have been recorded and broad habitat types can be determined with a good degree of accuracy, some estimates of plant species percentage cover, required for condition assessments, may be slightly inaccurate. It is, however, not considered that this will have had an impact on the overall outcome of the calculation.

## 3 Results

### 3.1 Site Selection Rationale

Existing SDDC sites with relatively low existing ecological value and/or habitats in poor condition have been selected to provide the enhancements for the scheme. They provide a valuable area for the local community and stepping stones for a variety of wildlife but are not currently of high ecological distinctiveness or good condition due to lack of funding for appropriate enhancement and management. Use of these sites within the schemes BNG metric will secure their long-term management and prevent an otherwise inevitable decline in their ecological value. All of the sites are within the LPA and  $\leq 1.5$  miles of the link road scheme therefore providing mitigation directly within the impact zone. This has many and broad benefits:

- Enhanced habitats are within the dispersal range for species that may have been displaced from habitats lost to the scheme.
- The use of local, publically accessible sites will contribute to the physical and mental health and wellbeing of the local community and foster better connections between people and wildlife.
- The enhancements can be incorporated and strategically designed alongside other council habitat improvements to deliver bigger, better, more and joined up landscape scale conservation.

Three of the sites are existing Green Space or Local Wildlife Sites (LWS), protected by policy in the Local Plan and therefore have high strategic significance.

**Site 1**, here-in-after referred to as 'Sandholes' is located 1.2 miles north-west of the proposed scheme. It consists of improved grassland, broad-leaved woodland, scrub and hedgerows. The site is surrounded by housing and roads on all sides, therefore having low habitat connectivity.

**Site 2**, here-in-after referred to as 'Unnamed grassland' is located in Church Gresley and approximately 1 mile west of the proposed scheme. It comprises improved grassland with self-set scrub and small trees. It is surrounded by a small band of broad-leaf woodland to the south, playing fields and sports pitches to the west and housing and roads to the north and east, therefore having relatively low habitat connectivity.

**Site 3**, here-in-after referred to as 'Salt Meadow plantations' is located approximately 0.5 miles north of the proposed scheme. The plantations form part of a wider Local Wildlife Site comprising broadleaf woodland, scrub, semi-improved grassland and ponds. The site is surrounded by housing and roads to the east and west, with further a LWS (Midway Fishing ponds) and potential LWS (Swadlincote Woodlands) to the north

and south. Despite this apparent good connectivity to other sites, the technical advice<sup>4</sup> leads to this site being assigned a low habitat connectivity multiplier.

Three other SDDC sites were surveyed with the view to including their enhancement on this schemes BNG metric. Two of the sites, Salts Meadow and Swadlincote Woods, as a result of their existing moderate condition and an improvement in their management over the past few years by the councils Green Space team, were considered likely to achieve good condition over the next 5-10 years without further capital works. Therefore, any further enhancement and resources received through this scheme would demonstrate additionality and have therefore not been included. The third site, Hall Wood pond, while in poor condition and requiring enhancement works, was removed from the scheme due to the high risk of failure. The pond, shown in Photograph 1, was covered in a thick mat of duckweed caused by eutrophication. Before any enhancement work could take place, an investigation into the source of eutrophication would have been required and the findings of this would determine the success. Work was completed to try and include the pond, firstly for the importance of having good condition ponds within an LWS; secondly, to provide like-for-like habitat compensation for the loss of wetland habitats within the scheme, however, enough units could be achieved without the inclusion of the pond and it was considered the risk of failure was too high. Furthermore, enhancement of ponds is a very high cost to benefit ratio, with price per unit much higher than that of woodland or grassland.

**Photograph 1: Hall Wood pond**



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<sup>4</sup> In the beta version of biodiversity metric 2.0 all High and Very High distinctiveness habitats should be assigned a Medium connectivity multiplier, other habitats a Low connectivity multiplier.

## 3.2 Baseline Habitat Data

### 3.2.1 Site 1 – Sandholes (2Ha)

Sandholes is an amenity green space, used heavily by the local community, especially dog walkers. It supports species poor, improved grassland dominated by grasses including perennial ryegrass *Lolium perenne*, timothy *Phleum pratense* and meadow foxtail *Alopecurus pratensis*, frequent cocks-foot *Dactylis glomerata* and Yorkshire fog *Holcus lanatus* and occasional red fescue *Festuca rubra* and rough meadow grass *Poa trivialis*. Herb species include locally abundant white clover *Trifolium repens*, frequent creeping buttercup *Ranunculus repens*, common sorrel *Rumex acetosa*, hogweed *Heracleum sphondylium*, broad-leaved dock *Rumex obtusifolius* and ribwort plantain *Plantago lanceolata* and occasional chickweed *Stellaria media* and meadow buttercup *Ranunculus acris*. Anecdotal evidence suggests that the grassland was once much more diverse but has been improved through mowing for amenity purposes. In small areas in the main grassland, species indicative of slightly lower nutrient levels including pignut *Conopodium majus* and field woodrush *Luzula campestris* are present in low abundances. A small slope to the east of the site supported a slightly higher botanical diversity, with species including bird's-foot trefoil *Lotus corniculatus*, speedwell *Veronica sp.*, hairy sedge *Carex hirta* and mouse-ear hawkweed *Pilosella officinarum*.

The grassland is characterised by dominant, fast growing grasses on fertile, neutral soils, with the abundance of perennial ryegrass above 25% in areas. In addition, the presence and abundance of undesirable species such as white clover, curled dock *Rumex crispus*, ragwort *Senecio jacobaea*, nettle *Urtica dioica* and creeping buttercup (undesirable species shown in red on Appendix 1 – Species Lists) confirms that the grassland meets the **poor condition** assessment criteria.

#### Photograph 2: Species poor, improved grassland



### 3.2.2 Site 2 – Unnamed Grassland (1.3 Ha)

The unnamed grassland in Church Gresley is a former colliery spoil tip, with shale deposits still visible. It supports species poor, semi-improved grassland with a rough, tussocky, grass-dominant character. It had a dense sward and a thick thatch layer. Abundant/ locally abundant grasses included rough meadow grass, red fescue and perennial ryegrass with cock's-foot, sweet vernal grass *Anthoxanthum odoratum*, Yorkshire fog, meadow foxtail, crested dog's tail *Cynosurus cristatus* and tufted hair grass all present at lower abundances. Herb species within the sward included black knapweed *Centaurea nigra*, pignut and lesser stitchwort *Stellaria graminea* all recorded locally in small patches with more widespread herb species including dandelion, goats beard *Tragopogon pratensis*, common sorrel and cleavers *Galium aparine*. Species indicative of poor condition were widespread and abundant comprising common ragwort, creeping thistle, cow parsley, curled dock, common nettle, and creeping buttercup. Encroaching scrub and small trees were extensive across the site and included pedunculate oak *Quercus robur*, hawthorn *Crataegus monogyna*, blackthorn *Prunus spinosa*, bramble *Rubus fruticosus* agg. and silver birch *Betula pendula*. Ash *Fraxinus excelsior* trees present on the site showed signs of Ash Dieback *Hymenoscyphus fraxineus*. The site has many signs of physical damage including deep ruts and areas of bare shale deposits. These factors indicate that the grassland is in **poor condition** when assessed against the condition criteria.

**Photograph 3: Species poor, semi-improved grassland**



### 3.2.3 Site 3 – Salt Meadow Plantations (1.2 Ha)

The plantation woodlands surrounding Salts Meadow are dominated by silver birch. Trees are young and all the same age and height structure. A small amount of natural regeneration is present with occasional pedunculate oak and goat willow *Salix caprea* on the margins. Ground flora was dominated by grasses including tufted hair grass *Deschampsia caespitosa*, tall fescue *Festuca arundinacea* and cock's-foot. Robust herb species including rosebay willowherb *Chamerion angustifolium*, creeping thistle, common nettle and field horsetail *Equisetum arvense* were also present. The woodland block adjacent to the road recorded slightly higher species diversity with young regenerating species included hawthorn, hazel *Corylus avellana* and horse chestnut *Aesculus hippocastanum* at relatively low abundances. Given the lack of species and structural diversity within the canopy, the visible planting lines and absence of large standing or fallen deadwood, the woodland blocks are assessed to be in **poor condition**.

**Photograph 4: Silver birch plantations**



## 4 Habitat Enhancement

Site reference	Objective	Actions	Indicators of success
<b>1. Sandholes grassland</b>	To enhance the improved grassland, increasing the condition from poor to good by increasing species diversity and decreasing undesirable species.	Sow with wildflower grassland seed mix and manage with a late-summer hay meadow cut.	All of the following criteria are met: <ol style="list-style-type: none"> <li>1. Wildflowers and sedges above 30% excluding white clover and creeping buttercup.</li> <li>2. Cover of bare ground &gt;10%.</li> <li>3. Cover of undesirable species (creeping thistle, spear thistle, curled dock, broad-leaved dock, common ragwort, common nettle, creeping buttercup, white clover, cow parsley, marsh thistle and marsh ragwort) &lt; 5%.</li> <li>4. Cover of bracken &lt;20% and cover of scrub and bramble &lt;5%.</li> <li>5. No indicators of physical damage (from management, machinery etc).</li> </ol>
<b>2. Unnamed grassland</b>	To enhance the semi-improved grassland, increasing the condition from poor to good by increasing species diversity and decreasing undesirable species.	Sow with wildflower grassland seed mix and manage with a late-summer hay meadow cut. Retained scattered scrub at current levels.	All of the following criteria are met: <ol style="list-style-type: none"> <li>1. Wildflowers and sedges above 30% excluding white clover and creeping buttercup.</li> <li>2. Cover of bare ground &gt;10%.</li> <li>3. Cover of undesirable species (creeping thistle, spear thistle, curled dock, broad-leaved dock, common ragwort, common nettle, creeping buttercup, white clover, cow parsley, marsh thistle and marsh ragwort) &lt; 5%.</li> </ol>

			<p>4. Cover of bracken &lt;20% and cover of scrub and bramble &lt;5%.</p> <p>5. No indicators of physical damage (from management, machinery etc).</p>
<p><b>3. Salt Meadow plantations</b></p>	<p>To enhance the silver birch plantations, increasing the condition from poor to moderate by increasing species diversity, age range and structure, ground flora diversity and amount of deadwood, both standing and fallen.</p>	<p>Selective fell of silver birch, plant additional broadleaf species, ring-bark to create deadwood and seed ground flora with wildflower mix.</p>	<p>All of the following criteria are met:</p> <ol style="list-style-type: none"> <li>1. A diverse species, age and height structure of trees.</li> <li>2. Standing and fallen deadwood of over 20cm diameter are present.</li> <li>3. Original planting lines no longer obvious.</li> <li>4. Invasive non-native plants &lt;20%.</li> <li>5. No evidence of inappropriate management (deep ruts, poaching or compaction).</li> <li>6. Free from damage by animals.</li> </ol>

### 4.1 Habitat Enhancement Rationale

Neutral grassland makes up the majority of the habitat enhancement. The loss of species-rich neutral grassland within the UK over the past half-century has been well-documented, as summarised within the Lowland Derbyshire Biodiversity Action Plan<sup>5</sup> (BAP).

*'In Derbyshire it is estimated that there has been an 80 to 91% decline between 1984 and 1999.'*

The BAP has a target to restore 150 Ha of lowland neutral grassland within the National Forest action area by 2020. Whilst this date precedes the date for the period covered by this plan, future revision of the BAP will

<sup>5</sup> Lowland Derbyshire Biodiversity Action Plan 2011-2020 (2011) Lowland Derbyshire Biodiversity Partnership.

invariably see new targets set. Restoration of 3 Ha of neutral grassland would make a valuable contribution to current and predicted targets within the BAP.

The creation of woodlands in the National Forest action area over the last 20 years has been well supported, however, the BAP did not reach its target for mixed deciduous woodlands in appropriate management in 2011. The enhancement and long-term management of the woodlands surrounding Salts Meadow will contribute to the 2000 Ha current and future predicted targets within the BAP.

The habitats selected for enhancement provide an almost exact like-for-like replacement of those lost to the development of the scheme. Given the local proximity of the sites to the scheme, these areas have the potential to support a range of wildlife that have been affected by the loss of habitats.

## 5 Biodiversity Net Gain Calculations

Off-site baseline data and habitat enhancements were assessed using the Biodiversity Metric 2.0 in order to measure the habitat units gained through the enhancements. The results table below shows the proposed enhancement works to the three sites will have a total net unit change of 0.26 habitat units, providing a biodiversity net gain of 0.73%. This is an increase from the original scheme of 23.9 habitat units. Full biodiversity metric calculations are provided in a separate spreadsheet.

<b>On-site baseline</b>	<i>Habitat units</i>	35.37
	<i>Hedgerow units</i>	0.17
	<i>River units</i>	0.00
<b>On-site post-intervention</b> (Including habitat retention, creation, enhancement & succession)	<i>Habitat units</i>	11.73
	<i>Hedgerow units</i>	3.53
	<i>River units</i>	0.00
<b>Off-site baseline</b>	<i>Habitat units</i>	13.11
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
<b>Off-site post-intervention</b> (Including habitat retention, creation, enhancement & succession)	<i>Habitat units</i>	37.01
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
<b>Total net unit change</b> (including all on-site & off-site habitat retention/creation)	<i>Habitat units</i>	0.26
	<i>Hedgerow units</i>	3.36
	<i>River units</i>	0.00
<b>Total net % change</b> (including all on-site & off-site habitat creation + retained habitats)	<i>Habitat units</i>	0.73%
	<i>Hedgerow units</i>	2030.03%
	<i>River units</i>	0.00%

Detailed results of the habitat units delivered by each site is shown below. The majority of the units will be achieved through the enhancement of the grassland sites, with smaller units being achieved by enhancement of the plantation woodlands.

3	2	1	Ref	
Woodland and forest - Young Trees planted	Grassland - Modified grassland	Grassland - Modified grassland	<b>Baseline habitat</b>	<b>Baseline habitats</b>
1.2	1.3	2	<b>Area (Ha)</b>	
Medium	Low	Low	<b>Distinctiveness</b>	
Poor	Poor	Poor	<b>Condition</b>	
Low	Low	Low	<b>Ecological connectivity</b>	
High strategic significance	High strategic significance	High strategic significance	<b>Strategic significance category</b>	
5.52	2.99	4.6	<b>Habitat units</b>	
Woodland and forest - Other woodland; broadleaved	Grassland - Other neutral grassland	Grassland - Other neutral grassland	<b>Proposed habitat</b>	<b>Enhancement</b>
Medium - Medium	Low - Medium	Low - Medium	<b>Distinctiveness change</b>	
Poor - Moderate	Lower Distinctiveness Habitat - Good	Lower Distinctiveness Habitat - Good	<b>Condition change</b>	
Moderate	Good	Good	<b>Condition</b>	
Medium	Low	Low	<b>Ecological connectivity</b>	
Within area formally identified in local strategy	Ecologically desirable but not in local strategy	Within area formally identified in local strategy	<b>Strategic position</b>	
High strategic significance	High strategic significance	High strategic significance		
15	15	15	<b>Time to target condition</b>	
Medium	Low	Low	<b>Difficulty of enhancement category</b>	
Compensation inside LPA	Compensation inside LPA	Compensation inside LPA	<b>Spatial risk category</b>	
7.69	11.24	18.08	<b>Habitat units delivered</b>	

## 6 Habitat Implementation and Management

Site reference and habitat	Management Prescriptions	Monitoring
<p><b>Sites 1 &amp; 2</b></p> <p>Improved / semi-improved grassland</p>	<p><u>Year 1</u></p> <ul style="list-style-type: none"> <li>a) Carry out late summer (Aug/Sept) cut as short as possible.</li> <li>b) Immediately after chain harrow the grassland twice in immediate succession and in a different direction each time.</li> <li>c) Broadcast wildflower seed mix in October/ November once grass growth has started to slow. Example seed mix – Emorsgate EM2F Standard general purpose 100% wild flowers. This is designed to create a permanent wildflower area and includes 6% yellow rattle in order to suppress the competition of grasses.</li> <li>d) Flat roll the grassland to ensure good seed to soil contact.</li> <li>e) Limit trampling pressure whilst wildflowers establish using signs asking members of public to stay on the mown paths.</li> </ul> <p><u>Year 2-4</u></p> <ul style="list-style-type: none"> <li>f) Remove the grass canopy in early spring and late autumn to allow the wildflowers to become established and compete with the grasses in the area.</li> <li>g) Cut the area down to around 10cm leaving the cuttings for up to a week before removing. This will allow them to dry and shed seeds back into the soil.</li> <li>h) Mow paths through the grassland on a regular basis to avoid trampling throughout the field.</li> </ul> <p><u>Year 5 onwards</u></p> <ul style="list-style-type: none"> <li>i) Once the wildflowers have established and grasses are less vigorous, carry out an annual late-summer hay cut. Leave arising on site for 3-4 days before removing to ensure seed dispersal.</li> <li>j) If the weather is particularly mild or the grass growth is strong, additional cuttings may be required, however avoid doing so before or immediately after flowering to ensure best results.</li> </ul>	<p><u>Years 2-4</u></p> <p>Botanical survey including 20 2m x 2m quadrats per ha of grassland.</p> <p><u>Years 6, 8, 10 then every 5 years</u></p> <p>Botanical survey including 20 2m x 2m quadrats per ha of grassland.</p>

	<p>k) As an ongoing process, observe and remove any weeds which invade the area. Carry out targeted removal (pulling or cutting) of undesirable species as required.</p> <p><u>Site 2 only</u> Retained scattered scrub at current levels (approx. 5%). Monitor scrub encroachment and removed where necessary.</p>	
<p><b>Site 3</b></p> <p>Young plantation woodland</p>	<p><u>Year 1</u></p> <ul style="list-style-type: none"> <li>a) Thin woodland canopy up to 20%, favouring the removal of smaller trees and allowing larger trees more light to thrive.</li> <li>b) Ring bark approx. 10% of trees to provide standing deadwood. Lop ringbarked trees to 10ft to reduce safety risks.</li> <li>c) Retain all felled trees as fallen deadwood or habitat piles.</li> </ul> <p><u>Year 2</u></p> <ul style="list-style-type: none"> <li>d) Carry out late summer (Aug/Sept) cut to ground flora.</li> <li>e) Rake the ground to remove any thatch and open up the sward.</li> <li>f) Sow wildflower seed mix in October/ November once grass growth has started to slow.</li> <li>g) Trample seed to ensure seed to soil contact.</li> </ul> <p><u>Year 3</u></p> <ul style="list-style-type: none"> <li>h) Plant a mixture of broad-leaf trees (pedunculate oak, sessile oak, hazel, field maple, rowan) at 5-6 metre spacing filling the gaps created by felling.</li> <li>i) Protect trees from browsing using tree guards and stakes.</li> <li>j) In high light levels, ground flora may require a scythe, especially where nettle and bramble are outcompeting wildflower.</li> </ul>	<p><u>Year 2</u></p> <p>Carry out 50x50 quadrat survey.</p> <p><u>Year 3</u></p> <p>Carry out 50x50 quadrat survey.</p>

	<p><u>Year 5 onwards</u></p> <p>k) Coppice hazel on a 5-10 year rotation.  l) Thin 5% of woodland every other year and retain on woodland floor or in habitat piles.</p>	<p><u>Year 5</u></p> <p>Carry out 50x50 quadrat survey. Repeat every 5 years.</p>
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Management prescriptions for the enhancement of the grassland and woodland sites are provided above, however, it should be noted that for many of the outcomes a variety of capital works and long-term management methods could be used and an amount of flexibility is anticipated depending on timing, staff experience and habitat conditions providing the target condition is met. Standard seed mixes have been recommended but these could be varied depending on local conditions and an acid grassland or wet grassland mix may be more suitable on some areas of the sites. The monitoring of sites will feed back into the management prescriptions and where necessary changes can be made to ensure the target condition is achieved. Furthermore, additional council funded or volunteer work could run alongside enhancement within the metric, such as bulb planting or creation of bare ground providing that the overall habitats and target conditions are achieved.

## 6.1 Constraints

Ideally green hay would be used for the grassland enhancement in order to ensure local genetics and avoid the inclusion of agricultural varieties, however, diverse hay meadow donor sites are severely lacking in the South Derbyshire area and this is unlikely to be feasible. Wildflower seeding is therefore proposed, however two key points are recommended in order to avoid any negative impacts of seeding.

- It is recommended that the ground is prepared for seed application without the use of chemicals, using either chain harrow or disc overseeder. Chemicals should be avoided in the long-term management of the grasslands, even where non-desirable species are present. With the change in management soil nutrients will decrease and eventually non-desirable species will die out naturally. Targeted pulling or mowing of undesirable species will also speed up this decline where required.
- Seed mixtures should contain only native species from UK origin and should not include agricultural species such as cornflower and corn marigold.

## 7 Estimated Costs

Sandholes Grassland (2 Ha)			
Action	Amount	Estimated cost (exc. VAT)	Description
<b>Capital works</b>			
Preparations and improvements	2 Ha	£2,997	Including short cut, harrow, broadcasting and flat rolling.
Wildflower seed	30 Kg	£4,230	Based on a sowing rate of 15kg per Ha – Emorsgate EM2F Standard general purpose 100% wild flowers. <a href="http://www.wildseed.co.uk">www.wildseed.co.uk</a> .
<b>Management</b>			
On-going management – removing hay	2 Ha	£1,520 x 32 years = £48,640	32 years management. Possibility to reduce/eradicate this cost if an agreement with a local farmer can be arranged – they may accept it as a standing crop and take it for free. £350 per additional day as required to carry out smaller targeted cuts in March.
<b>Monitoring</b>			
Surveys, data analysis & report	5.5 days per survey. £350/day	£1925 x 10 years = £19,250	Quadrat surveys. Plus an annual inflation increase of approximately 2%.
<b>ESTIMATED TOTAL</b>		<b>£75,117</b>	(~£5,572 per unit)

Church Gresley Grassland (1.3 Ha)			
Action	Amount	Estimated cost (exc. VAT)	Description
<b>Capital works</b>			
Preparations and improvements	1.3 Ha	£2,304	Including short cut, harrow, broadcasting and flat rolling.
Wildflower seed	20 Kg	£2,820	Based on a sowing rate of 15kg per Ha – Emorsgate EM3F Standard general purpose 100% wild flowers. <a href="http://www.wildseed.co.uk">www.wildseed.co.uk</a> .
<b>Management</b>			

On-going management removing hay –	1.3 Ha	£980 x 32 years = £31,360	32 years management. Possibility to reduce/eradicate this cost if an agreement with a local farmer can be arranged – they may accept it as a standing crop and take it for free. £350 per additional day as required to carry out smaller targeted cuts in March.
<b>Monitoring</b>			
Surveys, data analysis & report	3.5 days per survey. £350/day	£1225 x 10 years = £12,250	Quadrat surveys. Plus an annual inflation increase of approximately 2%.
<b>ESTIMATED TOTAL</b>		<b>£48,734</b>	(~£5,907 per unit)

Silver Birch Plantations (1.2 Ha)			
Action	Amount	Estimated cost (exc. VAT)	Description
<b>Capital works</b>			
Woodland thinning, including ring barking and lopping.	1.2Ha	£2,054	Assumes tractor can access site, material to be chipped and remain on site.
Woodland planting	1.2 Ha	£2,347	Planting 200 - 400 trees with tube guards and stakes. P.Oak, S.Oak, Hazel, Rowan and Field Maple range between £0.78 and £0.95 – <a href="http://www.heathwood.co.uk">www.heathwood.co.uk</a> .
Woodland ground flora enhancement	1.2 Ha	£1,405	Creation of sections of woodland meadow within clearings. Including wildflower seed, based on a sowing rate of 15kg per Ha – Emorsgate EW1F Wild flowers for woodlands. <a href="http://www.wildseed.co.uk">www.wildseed.co.uk</a> .
<b>Management</b>			
Ongoing woodland management	£350/day.	£5,250	Coppicing on 5 year rotation. 5% thin every other year. Scythe ground flora where required. Additional days may be required where undesirable species are present.
<b>Monitoring</b>			

Surveys, data analysis & report	3 days per survey. £350/day	£1050 x 8 = £8,400	Quadrat surveys. Plus an annual inflation increase of approximately 2%.
<b>ESTIMATED TOTAL</b>		<b>£19,456</b>	(~£8,966 per unit)
<b>Contingency costs (10%)</b>			
Site 1		£7,511	
Site 2		£4,873	
Site 3		£1,946	
	<b>TOTAL</b>	<b>£16,344</b>	

## 7.1 Approach Rationale

The aforementioned proposals are considered to be the most cost-effective strategy whilst delivering valuable habitat enhancement and providing the scheme with no net loss in biodiversity. A number of factors highlight the benefit of this approach over alternative methods of delivering biodiversity offsetting:

- Mitigation is local and will provide enhanced habitats directly for wildlife that may have been displaced from the loss of habitats within the scheme.
- The local community will benefit from the enhanced sites, providing some compensation for their loss of natural areas and increase in development. This has many broader benefits including positive impacts on health and wellbeing.
- All proposed mitigation is in the same Local Planning Authority (LPA) as the development scheme meaning the units can be achieved with smaller areas (as they have a higher multiplier). This has significant capital works and long-term management cost benefits.
- The sites are of medium to high strategic importance, being designated as LWS's, Green Spaces or directly connected to such a site.
- Enhancements are cost-effective and much of the long-term management can be incorporated into the councils existing schedule. By the very nature of the enhancements, long-term management is not expected to be onerous once established.
- Sites are already owned by the council therefore reducing the initial capital outlay significantly.
- Other biodiversity offsetting methods include use of the habitat bank. This can cost up to £15,000 per unit (approx. £375,000 over the lifetime), as opposed to the proposed average of £5,996 per unit (approx. **£143,307** over the lifetime of the project).

## 8 Conclusion

To conclude, this report has identified three SDDC owned sites that have the potential to provide off-site compensation in order to deliver the Woodville Link Road scheme with no net biodiversity loss. The sites have been chosen as they can provide like-for-like habitat enhancement; achieving the required units in the biodiversity metric and offering valuable habitats within close proximity to the scheme. In addition, and not given weight within the metric, the sites are publically accessible; the increase in biodiversity and wildlife on these sites provides compensation for the loss of other natural areas and increase in development and contributes to the physical and mental health of the local community. The sites and enhancement proposals offer a highly cost-effective solution, with estimated costs less than half those of other strategies, and can be delivered quickly and effectively with relatively low risk of failure.

## Appendix 1: Botanical Species Lists

Site 1. Sandholes Improved Grassland			
Scientific Name	Common Name	Abundance	Location
<i>Acer pseudoplatanus</i>	Sycamore	O	Scattered
<i>Achillea millefolium</i>	Yarrow	LA	Grassland
<i>Alopecurus pratensis</i>	Meadow Foxtail	LD	Grassland
<i>Anthriscus sylvestris</i>	Cow Parsley	F	Grassland
<i>Arrhenatherum elatius</i>	False Oat-grass	O	Margins
<i>Capsella bursa-pastoris</i>	Shepherd's-purse	R	Grassland
<i>Cardamine hirsuta</i>	Hairy Bitter-cress	R	Grassland
<i>Carex hirta</i>	Hairy Sedge	LF	Grassland
<i>Cerastium fontanum</i>	Common mouse-ear	O	TN1
<i>Chamerion angustifolium</i>	Rosebay Willowherb	F	Margins
<i>Cirsium arvense</i>	Creeping Thistle	F	Margins
<i>Conopodium majus</i>	Pignut	R	Grassland
<i>Crataegus monogyna</i>	Hawthorn	O	Scattered
<i>Dactylis glomerata</i>	Cock's-foot	LA	Grassland
<i>Festuca rubra</i> agg.	Red Fescue	LF	Grassland
<i>Galium aparine</i>	Cleavers	O	Grassland
<i>Galium verum</i>	Lady's Bedstraw	R	TN1
<i>Geranium pyrenaicum</i>	Hedgerow Crane's-bill	O	Margins
<i>Heracleum sphondylium</i>	Hogweed	F	Grassland
<i>Holcus lanatus</i>	Yorkshire-fog	A	Grassland
<i>Hyacinthoides hispanica</i>	Spanish Bluebell	R	Grassland
<i>Lamium album</i>	White Dead-nettle	LF	Grassland
<i>Lolium perenne</i>	Perennial Rye-grass	LD	Grassland
<i>Lotus corniculatus</i>	Common Bird's-foot-trefoil	O	TN1
<i>Luzula campestris</i>	Field Wood-rush	R	Grassland
<i>Myosotis sylvatica</i>	Wood forget-me-not	O	Margins
<i>Phleum pratense</i> sens.lat.	Timothy	O	Grassland
<i>Pilosella officinarum</i>	Mouse-ear-hawkweed	R	TN1
<i>Plantago lanceolata</i>	Ribwort Plantain	F	Grassland
<i>Plantago major</i>	Greater Plantain	O	Grassland
<i>Poa annua</i>	Annual Meadow-grass	O	Grassland
<i>Poa trivialis</i>	Rough Meadow-grass	O	Grassland

<i>Populus alba</i>	White Poplar	F	Margins
<i>Quercus robur</i>	Pedunculate Oak	O	Scattered
<i>Ranunculus acris</i>	Meadow Buttercup	O	Grassland
<i>Ranunculus repens</i>	Creeping Buttercup	O	Grassland
<i>Rubus fruticosus</i> agg.	Bramble	F	Margins
<i>Rumex acetosa</i>	Common Sorrel	F	Grassland
<i>Rumex crispus</i>	Curled Dock	O	Grassland
<i>Rumex obtusifolius</i>	Broad-leaved Dock	F	Grassland
<i>Senecio jacobaea</i>	Common Ragwort	O	Grassland
<i>Stellaria media</i>	Common Chickweed	O	Grassland
<i>Taraxacum officinale</i> agg.	Dandelion	F	Grassland
<i>Trifolium repens</i>	White Clover	LA	Grassland
<i>Urtica dioica</i>	Common Nettle	LF	Grassland
<i>Veronica</i> sp.	Speedwell	R	TN1
<i>Vicia sativa</i>	Common Vetch	O	Margins

#### Site 2 – Unnamed Semi-improved Grassland

Scientific name	Common name	Abundance	Location
<i>Acer</i> sp.	a maple	O	Scattered
<i>Alopecurus pratensis</i>	Meadow Foxtail	LF	Grassland
<i>Anthoxanthum odoratum</i>	Sweet Vernal Grass	O	Grassland
<i>Anthriscus sylvestris</i>	Cow Parsley	LA	Grassland
<i>Arrhenatherum elatius</i>	False Oat-grass	O	Grassland
<i>Betula pendula</i>	Silver Birch	O	Scattered
<i>Centaurea nigra</i>	Common Knapweed	LF	Grassland
<i>Cerastium fontanum</i>	Common mouse-ear	R	Grassland
<i>Cirsium arvense</i>	Creeping Thistle	F	Grassland
<i>Conopodium majus</i>	Pignut	LO	Grassland
<i>Convolvulus arvensis</i>	Field Bindweed	O	Grassland
<i>Crataegus monogyna</i>	Hawthorn	O	Grassland
<i>Cynosurus cristatus</i>	Crested Dog's-tail	O	Grassland
<i>Dactylis glomerata</i>	Cock's-foot	F	Grassland
<i>Deschampsia caespitosa</i>	Tufted Hair-grass	F	Grassland
<i>Festuca rubra</i> agg.	Red Fescue	LA	Grassland
<i>Fraxinus excelsior</i>	Ash	O	Grassland
<i>Galium aparine</i>	Cleavers	O	Grassland
<i>Heracleum sphondylium</i>	Hogweed	LA	Grassland

<i>Holcus lanatus</i>	Yorkshire-fog	O	Grassland
<i>Juncus effusus</i>	Soft Rush	LF	Grassland
<i>Juncus inflexus</i>	Hard Rush	R	Grassland
<i>Lolium perenne</i>	Perennial Rye-grass	LA	Margins
<i>Luzula campestris</i>	Field Wood-rush	R	Grassland
<i>Malus sp.</i>	an apple	O	Scattered
<i>Plantago lanceolata</i>	Ribwort Plantain	R	Margins
<i>Poa annua</i>	Annual Meadow-grass	O	Grassland
<i>Poa trivialis</i>	Rough Meadow-grass	A	Grassland
<i>Prunus spinosa</i>	Blackthorn	O	Scattered
<i>Quercus robur</i>	Pedunculate Oak	O	Scattered
<i>Ranunculus acris</i>	Meadow Buttercup	R	Grassland
<i>Ranunculus repens</i>	Creeping Buttercup	O	Grassland
<i>Rubus fruticosus agg.</i>	Bramble	O	Scattered
<i>Rumex acetosa</i>	Common Sorrel	O	Grassland
<i>Rumex crispus</i>	Curled Dock	F	Grassland
<i>Senecio jacobaea</i>	Common Ragwort	F	Grassland
<i>Stellaria graminea</i>	Lesser Stitchwort	LF	Grassland
<i>Taraxacum officinale agg.</i>	Dandelion	O	Grassland
<i>Tragopogon pratensis</i>	Goat's-beard	O	Grassland
<i>Urtica dioica</i>	Common Nettle	F	Grassland
<i>Vicia sativa</i>	Common Vetch	O	Grassland
<i>Vicia hirsuta</i>	Hairy Tare	R	Grassland
<b>Site 3 – Salts Meadow Plantations</b>			
<b>Scientific name</b>	<b>Common Name</b>	<b>Abundance</b>	<b>Location</b>
<i>Fraxinus excelsior</i>	Ash	F	Understory/regen
<i>Rubus fruticosus agg.</i>	Bramble	O	Ground flora
<i>Rumex obtusifolius</i>	Broad-leaved Dock	O	Ground flora
<i>Dactylis glomerata</i>	Cock's-foot	O	Ground flora
<i>Urtica dioica</i>	Common Nettle	F	Ground flora
<i>Salix fragilis</i>	Crack Willow	R	Ground flora
<i>Cirsium arvense</i>	Creeping Thistle	O	Ground flora
<i>Equisetum arvense</i>	Field Horsetail	LF	Ground flora
<i>Salix caprea</i>	Goat Willow	A	Canopy
<i>Crataegus monogyna</i>	Hawthorn	F	Understory/regen
<i>Corylus avellana</i>	Hazel	F	Understory/regen

WOODVILLE LINK ROAD BIODIVERSITY NET GAIN

<i>Stachys sylvatica</i>	Hedge Woundwort	O	Ground flora
<i>Geranium robertianum</i>	Herb-robert	O	Ground flora
<i>Epilobium parviflorum</i>	Hoary Willowherb	O	Ground flora
<i>Aesculus hippocastanum</i>	Horse-chestnut	F	Understory/regen
<i>Acer sp.</i>	a maple	O	Understory/regen
<i>Quercus robur</i>	Pedunculate Oak	F	Understory/regen
<i>Chamerion angustifolium</i>	Rosebay Willowherb	O	Ground flora
<i>Betula pendula</i>	Silver Birch	D	Ground flora
<i>Festuca arundinacea</i>	Tall Fescue	O	Ground flora
<i>Deschampsia caespitosa</i>	Tufted Hair-grass	F	Ground flora



Site 1  
Sandholes  
Improved grassland  
2Ha

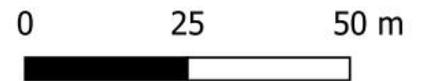
— Enhancement area





Site 2  
Unnamed grassland at  
Church Gresley  
Semi-improved grassland  
1.3Ha

— Enhancement area



Site 3  
Salts Meadow plantations  
1.2Ha

— Enhancement area



Proximity of sites to  
Woodville Link Road  
scheme



<b>REPORT TO:</b>	<b>ENVIRONMENT &amp; DEVELOPMENT SERVICES</b>	<b>AGENDA ITEM:</b>
<b>DATE OF MEETING:</b>	<b>13<sup>th</sup> August 2020</b>	<b>CATEGORY: RECOMMENDED</b>
<b>REPORT FROM:</b>	<b>ALLISON THOMAS, STRATEGIC DIRECTOR – SERVICE DELIVERY</b>	<b>OPEN</b>
<b>MEMBERS' CONTACT POINT:</b>	<b>Kevin Exley, Planning Policy Officer</b>	<b>DOC: 01283 228717</b>
<b>SUBJECT:</b>	<b>Biodiversity Offsetting and Update from Biodiversity Working Group</b>	
<b>WARD(S) AFFECTED:</b>	<b>ALL</b>	<b>TERMS OF REFERENCE: EDS01</b>

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## **1. Recommendations**

That the Committee:

- 1.1 Approves the proposed biodiversity enhancement works to sites outlined in the attached Biodiversity Net Gain Report.
- 1.2 Notes the update on the ongoing work of the Biodiversity Working Group

## **2. Purpose of the Report**

- 2.1. To seek authorisation to undertake biodiversity enhancement works to sites in the Swadlincote Urban Area in order to offset biodiversity losses associated with the Swadlincote Regeneration Area and provide Councillors with an update of the work of the Biodiversity working Group.

## **3. Detail**

### **A. Biodiversity Offsetting Proposals**

- 3.1. Planning Permission for the construction of an all-purpose single carriageway connecting between the existing roundabout spur at Occupation Lane, Woodville and the A514 Derby Road Swadlincote was approved by Derbyshire County Council in September 2019. Since then a Compulsory Purchase Order (CPO) has been made to allow the required land to be purchased, and funding for the road agreed.
- 3.2. One of the conditions (Condition 8) of the planning approval for the project requires that “No development, including preparatory works, shall take place until an Ecological Design Strategy (EDS), addressing biodiversity mitigation, compensation and enhancement to ensure the proposal does not result in a net loss of biodiversity in line with the DEFRA approved Biodiversity Accounting

Metrics, has been submitted and approved in writing by the Local Planning Authority”

- 3.3. Having undertaken a review of the ecological impact, the County Council received a report, undertaken by its retained consultants for the final project AECOM that the scheme would lead to a net loss of around two thirds of the ecological habitat on site, This is equivalent of 23.64 area-based habitat units based on the DEFRA Metric.
- 3.4 In trying to offset ecological losses associated with development it is possible to deliver improvements on the site where there is sufficient land to do so, however, in this instance the land parcel being developed for the road does not include sufficient additional land to accommodate the necessary biodiversity enhancements. As an alternative the Council has sought to work with a partner to deliver gains. Should this approach not be possible the County Council could utilise habitat banks, which are previously identified strategic offset sites. This option requires a payment to purchase the amount of “conversion credits” required, but this would fund works elsewhere in the UK.
- 3.4. It is understood that DCC approached the National Forest to ascertain whether any ecological enhancement works could be undertaken in South Derbyshire on land that it owns or manages. No such opportunities could be identified in South Derbyshire, although the potential for projects outside of the District was highlighted. Subsequently, a similar request was made to this Council for assistance as the County was keen to keep the required biodiversity enhancements in the District.
- 3.5. Following this request, a number of sites with potential for ecological enhancements (as identified in the Council's Nature Sites List, reported to this Committee in August 2019, and located close to the proposed road) were identified by officers of this Council's Biodiversity Working Group. The sites were then surveyed for the District Council by an ecologist from Derbyshire Wildlife Trust. Five sites were surveyed, of which three were identified as being suitable for ecological enhancement. These are sites at:

**Sandholes:**

- 3.6 This site is a proposed Local Green Space and has been identified as a site capable of enhanced management in the Council's Nature Sites List. The grassland is in poor condition. The proposals for this site are increase the quality of 2 ha of grassland through some initial works and secure a maintenance contribution for next 32 years and monitoring contribution from Derbyshire County Council. The total costs of the project will be circa £75K and it will deliver a net improvement of around 13.5 habitat units at an average cost of under £5,600 per unit.

**Unnamed Grassland (off George Street Church Gresley).**

- 3.7 This site is around 1.3ha and like Sandholes is characterised by species poor grassland. The proposals are to improve the diversity and condition of this grassland to good and in doing so deliver a net increase of 8.25 habitat units.

The costs of these works which will include initial works, 32 years management and monitoring will be circa £49K at an average cost of £5,900 per habitat unit.

**Swadlincote Woodlands.** (Area of plantation woodland)

- 3.8 This site forms parts of a larger local wildlife site which has been identified as a local site for further invention and improvements on the Council's nature sites list. The parcel to be improved comprises if around 1.2ha of plantation woodland. Works would seek to improve the quality of this woodland by thinning existing trees, planting new trees and improving the ground flora. The cost of these work is around £19K, this will cover initial work, ongoing management and monitoring for 32 years and the proposals will deliver about 2.2 habitat units of gain at a cost of around £9,000 per habitat unit created.
- 3.9 Cumulatively these three projects will deliver sufficient biodiversity enhancements on the receptor sites of a similar nature to losses associated with the road to fully offset the identified losses resulting from the construction of the new highway. Whilst the cost of works to the County Council will be around £143K, this investment into the proposed sites will have clear benefits for local communities and biodiversity in the District and will allow the Council to invest in nature on a number of sites identified for priority action in a previous report to this Committee in August 2019. Moreover, initial guidance on the likely cost of securing biodiversity gain published by DEFRA<sup>1</sup> indicates that offsite gains will cost in the order of £9,000 and £15,000 per biodiversity unit. On this basis the initial assumed costs for the necessary enhancements were expected to be of the order of £210-350K. The projects proposed by the District Council will cost an average of £6,000 per biodiversity unit. On this basis the proposals provide a clear benefit to both authorities.
- 3.10 It is expected that management of the offset sites will be undertaken by the Council's open spaces team and could help build capacity for managing other Council owned or managed sites in the interests of biodiversity.

**B. Biodiversity Working Group Update**

- 3.11 Councillors may recall that a Biodiversity Working Group was set up by the Council in June 2019, its terms of reference being confirmed in August 2019 by this Committee. Its purpose is to:
- identify and review existing policies, strategies, plans and practices, identify gaps and issues and identify remedial actions
  - benchmark these against good practice elsewhere
  - collate existing data and evidence on habitats and species and identify key issues
  - audit and analyse the range and roles of interested stakeholders and communities of interest, geography and/ or practice
  - prepare a Strategic Action Plan for Nature which will set out a range Council priorities and actions to conserve and enhance biodiversity through a coordinated, Council-wide approach to the creation and/or management of new and existing sites.

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<sup>1</sup> Natural England (2019) The Biodiversity Metric 2.0 – User Guide and Technical Supplement – Beta Test.

- 3.12 To date, progress has been made in a number of areas. Work has commenced on the Action Plan For Nature and a number of meetings have held with key stakeholders including County Ecologist, National Forest and the Environment Agency to devise an approach to biodiversity opportunity mapping and collate available evidence on the ecological condition of the District's habitats and the opportunities for habitat creation/enhancement.
- 3.13 Work on collating data and formulating the methodology for identifying biodiversity opportunity areas is ongoing. There has been some delay to this work due in part to Covid-19, the ability of partners to support/undertake work on biodiversity mapping, a delay in the progression of the Environment Bill due to the general election earlier in the year and the need to reassign an officer at Derbyshire Wildlife Trust to the Biodiversity Net Gain project considered earlier in this report. However, this work is again being prioritised.
- 3.14 Presently it is anticipated that a draft of the biodiversity opportunity mapping (BOM) for the District will be available in the Autumn. The BOM work will collate existing data to identify opportunity areas for the creation of new or enhancement of existing biodiversity and audit and analyse the range of roles of other agencies for delivering improvements. Following receipt of this key work it will be combined by the review of existing policies and strategies within the Council, information held by the Council on how Council-owned or managed sites are currently managed and best practice elsewhere and a draft Action Plan for Nature will be compiled shortly after. The draft Action Plan for Nature will be brought before the Committee for comment.

#### **4. Financial Implications**

- 4.1 Neutral Impact – It is expected that funding for improvements will be met from S106 capital and maintenance sums together with external funding. It is likely that the work of the Biodiversity Group, future plan making and management, including the commissioning of consultants can be delivered within the cost of existing budgets with any specific upfront costs associated with plan preparation being funded out of existing departmental spending. For example, the Strategic Action Plan for Nature will form part of the evidence base for any future Local Plan and will negate the need for a Local Plan focussed biodiversity study and strategy.

#### **5. Corporate Implications**

##### **Employment Implications**

- 5.1 Beneficial. Environmental conservation and enhancement will improve the attractiveness of the District as a great place to live, visit and invest.

##### **Legal Implications**

- 5.2 Beneficial. This work will allow an updated audit of Council functions against the requirements of the Natural Environment and Rural Communities (NERC) Act (a previous NERC Audit of Council functions was undertaken in 2009) and the emerging Environment Bill which is expected to be enacted by the end of 2020.

### **Corporate Plan Implications**

- 5.3 The work of the Biodiversity Working Group and the preparation of the Action Plan for Nature is likely to contribute to the delivery of a number of aims set out in the Corporate Plan. These include:
- to enhance biodiversity across the District (Our Environment)
  - to improve public spaces to create an environment for people to enjoy. (Our Environment)
  - Promote health and wellbeing across the District. (Our People)
  - To influence the improvement of infrastructure to meet the demands of growth. (Our Future)
  - Enable the delivery of housing across all tenures to meet Local Plan targets (our Future)
  - Provide modern ways of working that support the Council to deliver services to meet changing needs (Our Future)

### **Risk Impact**

- 5.4 The actions of the Biodiversity Working Group will have a beneficial mitigating action against the corporate risk of failing to meet increasing community aspirations for environmental stewardship.

## **6. Community Impact**

### **Consultation**

- 6.1 None.

### **Equality and Diversity Impact**

- 6.2 None.

### **Social Value Impact**

- 6.3 Beneficial. The proposed projects and preparation of the Action Plan for Nature will support improved access and awareness of biodiversity in the District.

### **Environmental Sustainability**

- 6.4 Beneficial. Enhancements to identified sites will improve their ecological condition and will enable the delivery of the Swadlincote Regeneration Route in accordance with the terms of its permission. The preparation of an Action Plan for Nature will allow the Authority to better coordinate management and delivery of biodiversity resource in the District.

## **7. Conclusions**

- 7.1 The specific projects identified in part A of this report will ensure that the development of the road does not lead to a loss of biodiversity in the District by working with the applicant (DCC) to improve sites elsewhere in the Swadlincote area to offset losses. However, future development in the District could, if inappropriately managed, lead to losses in biodiversity. The preparation of an Action Plan for Nature will allow the Council to manage existing sites in the interests of biodiversity and target new habitat creation associated with new development to areas where the greatest benefits can be realised.

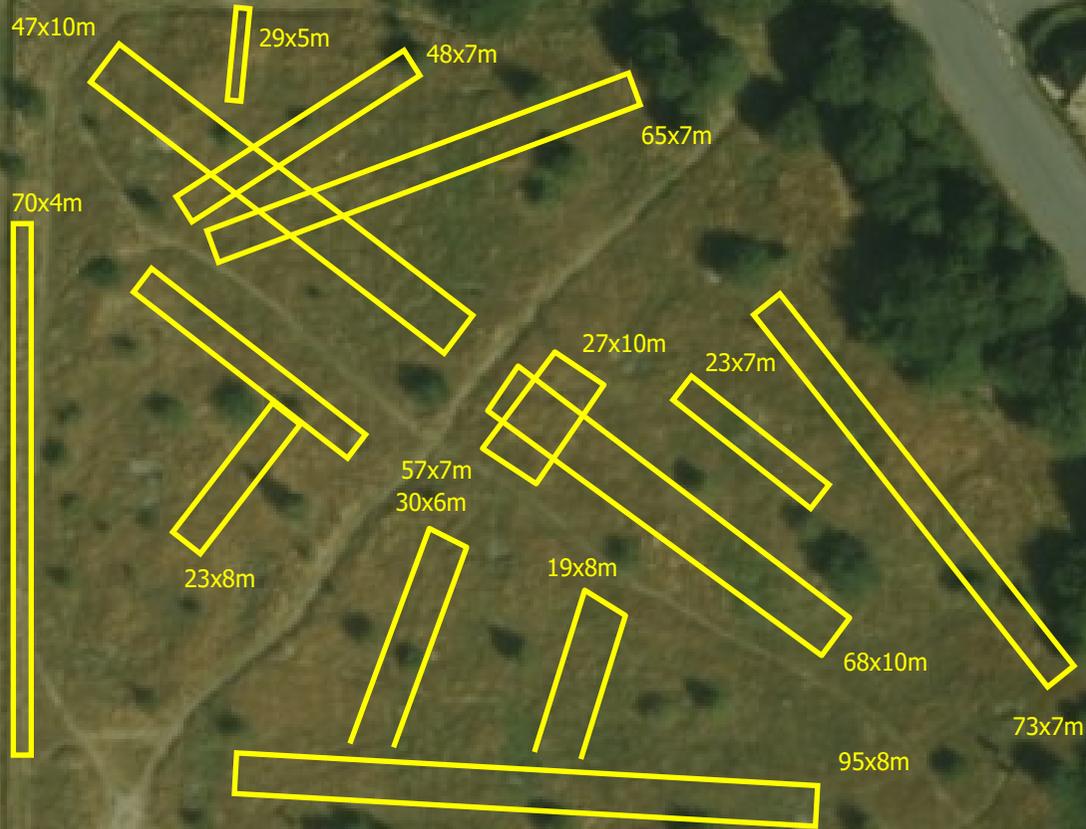
**8. Background Papers**

8.1 Woodville Link Road Biodiversity Net Gain Report.

# SANDHOLES WILDFLOWER PLANTING 2022



# OLD HALL MEADOW WILDFLOWER PLANTING 2022



 Neutral N6F Clay Soil Mix Flowers Only + Yellow Rattle + NCA1

All strips sprayed off with herbicide and seed direct drilled into ground

**Naturescape Limited**  
 Maple Farm, Coach Gap Lane  
 Langar  
 Nottinghamshire  
 NG13 9HP  
 01949 860592  
 sales@naturescape.co.uk  
 VAT Registration No.: 200676047  
 Company Registration No. 05034196  
 UKPlant Passport 127891



**ADDRESS**

South Derbyshire District Council  
 PO BOX 6657  
 Swadlincote  
 DE11 0WF  
 Derbyshire  
 DE11 0WF

**SHIP TO**

South Derbyshire DC  
 Steven Weber  
 Steven.Weber@southderbyshire.  
 gov.uk

**Estimate 1290**

**DATE** 01/09/2022

**SHIP VIA**

DPD

**P.O. NUMBER**

Steven Email 01/09/2022

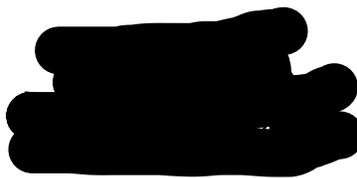
DESCRIPTION	QTY	RATE	AMOUNT	VAT
Please Label As SITE 1 - Sandholes		0.00		
BESPOKE MIX N1F General Purpose Mix Flowers Only 25kg Yellow Rattle 4.2kg + NCA1 5.1kg	34.35	121.411936	4,170.50	20.0% S
BESPOKE MIX: N12F Acid Soils Flowers Only 4.5kg Yellow Rattle 750g + NCA1 900g	6.15	170.00	1,045.50	20.0% S
Please Label As SITE 2 - Gresley Cemetery		0.00		
BESPOKE MIX: N6 Clay Soil Flower and Grass Meadow Mix 11.5kg Yellow Rattle 575g + NCA1 690g	12.765	59.1891892	755.55	20.0% S
Please Label As SITE 3 - Old Hall Meadow, George Street, Church Gresley		0.00		
BESPOKE MIX: N6F Clay Soil Mix Flowers Only 19.5kg Yellow Rattle 3.25kg + NCA1 3.9kg	26.65	156.8292683	4,179.50	20.0% S

INCLUDES TAX TOTAL 1,692.83

SHIPPING 4.99

**TOTAL £10,157.04**

**TAX SUMMARY**



RATE	TAX	NET
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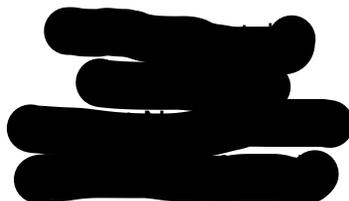
VAT @ 20%

1,692.83

8,464.21

Accepted By

Accepted Date

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**Coles Nurseries**

JAMES COLES & SONS (NURSERIES) LTD.

Registered Office:  
James Coles & Sons (Nurseries) Ltd.  
The Nurseries  
Thunby  
Leicester LE7 9QB  
Tel. 0116 241 2115  
Fax. 0116 243 2311  
Email. info@colesnurseries.co.uk  
Web. www.colesnurseries.co.uk

**South Derbyshire District Council  
Civic Offices  
Civic Way  
Swadlincote  
Derbyshire  
DE11 0AH**

## ORDER CONFIRMATION

Sales order no.: 81214  
Account code: DERBY6  
Entry date: 23/11/2022      Tel: 01283 595 795  
Page: 1      Fax: 01283 595 964

Details: COLLECT TBA

Reference STEVEN WEBER

Terms: 30 days nett.

Quantity	Plant name	Size	Reference	Price	Amount
25	Quercus robur	60/80 cm b/r	STEVEN WEBER	0.85	21.25
25	Quercus petraea	40/60 cm b/r	STEVEN WEBER	0.95	23.75
	All now available				
25	Crataegus monogyna	40/60 cm b/r	STEVEN WEBER	0.50	12.50
	Sold in bundles of 25				
50	Corylus avellana	40/60 cm b/r	STEVEN WEBER	0.65	32.50
	Sold in bundles of 25				
25	Sorbus aucuparia	40/60 cm b/r	STEVEN WEBER	0.80	20.00
	Sold in bundles of 25				
15	Acer campestre	80/100 cm C2	STEVEN WEBER	2.45	36.75
25	Viburnum opulus	40/60 cm b/r	STEVEN WEBER	0.60	15.00
	Sold in bundles of 25				
25	Rosa canina	30/40 cm C3	STEVEN WEBER	2.25	56.25
215	Bamboo Canes - 3FT		STEVEN WEBER	0.11	23.65
215	Rabbit guards	Spiral	STEVEN WEBER	0.35	75.25
			<b>Total</b>	<b>£</b>	<b>316.90</b>

# Purchase Order

Civic Office  
Civic Way  
Swadlincote  
Derbyshire  
DE11 0AH  
Tel: 01283 221000  
Web: www.southderbyshire.gov.uk



**Supplier:**  
Naturescape Limited

Maple Farm  
Coach Gap Lane  
Langar  
Nottinghamshire  
NG13 9HP

Email: sales@naturescape.co.uk

**Order Number** 2037927  
**Supplier No.** 109433  
**Order Date** 26/10/2021  
**Delivery Date** 26/10/2021  
**Contact** Yvonne Waring  
**Telephone** 01283 228766  
**Payment Terms** Net 30 Days  
**Your Reference**

**Delivery Address:**

Civic Deliveries  
Civic Offices  
Civic Way  
Swadlincote  
Derbyshire  
DE11 0AH

**Invoice Address:**

PO Box 6657  
Swadlincote  
Derbyshire  
DE11 0WF  
To speed payment, email your invoice to  
accounts@southderbyshire.gov.uk

Description	No. of Units	Unit	Price per Unit	Amount £
Estimate 1161 3000 x Anemone nemorosa (Wood Anemone) rhizomes	3000.00	UN	0.18	540.00
Estimate 1161 - 300 x Narcissus Pseudonarcissus (Wild Daffodil) bulbs	300.00	UN	1.08	324.00
Estimate 1161 2000 x Galanthus nivalis (single snowdrop) bulbs	2000.00	UN	0.19	380.00
Estimate 1161 5000 x Hyacinthoides non-scripta (English Bluebell) bulbs	5000.00	UN	0.36	1,800.00
Estimate 1161 60 x Arum Maculatum (Cuckoo Pint) bulb	60.00	UN	6.50	390.00
Estimate 1161 100 x Convallaria majalis (Lilly of the valley~) pips	100.00	UN	0.58	58.00
Estimate 1161 200 x Digitalis purpurea (Wild Foxglove) plugs	200.00	UN	0.48	96.00
Estimate 1161 200 x Primula vulgaris (Wild Primrose) plugs	200.00	UN	0.48	96.00
Estimate 1161 60 x Scrophularia Nodosa (Common Figwort) Plug	60.00	UN	0.60	36.00
Estimate 1161 900 x N10 Woodland Plant Collection Plug	900.00	UN	0.00	0.00
Estimate 1161 0.5 kg x N10F Woodland Seed Collection Flowers only 1kg bag	1.00	UN	0.00	0.00
Estimate 1161 - shipping	1.00	UN	8.29	8.29
Supply of works, goods and services are subject to SDDC Terms & Conditions at www.south-derbys.gov.uk/orderterms			<b>Total Amount</b>	<b>3,728.29</b>

ALL INVOICES MUST STATE THE OFFICIAL ORDER NUMBER OTHERWISE PAYMENT MAY BE DELAYED

# Purchase Order

Civic Office  
Civic Way  
Swadlincote  
Derbyshire  
DE11 0AH  
Tel: 01283 221000  
Web: [www.southderbyshire.gov.uk](http://www.southderbyshire.gov.uk)



South  
Derbyshire  
District Council

**Supplier:**  
Naturescape Limited  
  
Maple Farm  
Coach Gap Lane  
Langar  
Nottinghamshire  
NG13 9HP  
  
Email: [sales@naturescape.co.uk](mailto:sales@naturescape.co.uk)

<b>Order Number</b>	<b>2037968</b>
Supplier No.	109433
Order Date	02/11/2021
Delivery Date	29/10/2021
Contact	Yvonne Waring
Telephone	01283 228766
Payment Terms	Net 30 Days
Your Reference	

**Delivery Address:**  
Civic Deliveries  
Civic Offices  
Civic Way  
Swadlincote  
Derbyshire  
DE11 0AH

**Invoice Address:**  
PO Box 6657  
Swadlincote  
Derbyshire  
DE11 0WF  
To speed payment, email your invoice to  
[accounts@southderbyshire.gov.uk](mailto:accounts@southderbyshire.gov.uk)

Description	No. of Units	Unit	Price per Unit	Amount £
Estimate 1166 N10 Woodland Plant Collection Plug	900.00	UN	0.57	513.00
Estimate 1166 N10F Woodland Seed Collection Flowers only	0.50	UN	220.00	110.00
			<b>Total Amount</b>	<b>623.00</b>

Supply of works, goods and services are subject to SDDC Terms & Conditions at [www.south-derbys.gov.uk/orderterms](http://www.south-derbys.gov.uk/orderterms)

**ALL INVOICES MUST STATE THE OFFICIAL ORDER NUMBER OTHERWISE PAYMENT MAY BE DELAYED**

<b>REPORT TO:</b>	<b>ENVIRONMENTAL AND DEVELOPMENT SERVICES COMMITTEE</b>	<b>AGENDA ITEM: 8</b>
<b>DATE OF MEETING:</b>	<b>21 SEPTEMBER 2023</b>	<b>CATEGORY: RECOMMENDED</b>
<b>REPORT FROM:</b>	<b>STRATEGIC DIRECTOR (SERVICE DELIVERY)</b>	<b>OPEN</b>
<b>MEMBERS' CONTACT POINT:</b>	<b>MATT HOLFORD, HEAD OF ENVIRONMENTAL SERVICES,</b> <a href="mailto:matthew.holford@southderbyshire.gov.uk">matthew.holford@southderbyshire.gov.uk</a>	<b>DOC:</b>
<b>SUBJECT:</b>	<b>ANNUAL REVIEW OF THE COUNCIL'S CLIMATE AND ENVIRONMENT ACTION PLAN (2021-30)</b>	
<b>WARD(S) AFFECTED:</b>	<b>ALL</b>	<b>TERMS OF REFERENCE: EDS01</b>

## 1 Recommendations

- 1.1 That the Committee notes the current progress made in reducing carbon emissions as described in the SDDC Annual Carbon Reduction Progress Report 2022/23 (attached as Appendix 1).
- 1.2 That the Committee approves the recommendations set out in the Annual Climate and Environmental Action Plan Review 2023 (attached as Appendix 2).
- 1.3 That the Committee approves the proposed amendments to the Climate and Environment Action Plan attached as Appendix 3.
- 1.4 That the Committee recognises that to achieve the Climate Emergency declaration to "Strive to make South Derbyshire District Council carbon neutral by 2030" that the transformation actions T1 to T6 will need to be included in the future Council Plan.
- 1.5 That the current SDDC In-house Carbon Emission Roadmap will need to be revised to reflect the current realities of delivering net zero emissions.
- 1.6 That the Committee approves a revised Environment Policy.

## 2 Purpose of the Report

- 2.1 To inform Committee of the carbon emissions caused by Council activities during 2022/23 and the reduction in carbon emissions compared to a 2018/19 baseline.
- 2.2 To provide the Committee with a structured annual review of the progress of the Climate & Environmental Action Plan and its 57 actions as approved by the Committee in August 2022.
- 2.3 To obtain Committee approval to revise the existing Climate & Environmental Action Plan.

- 2.4 To emphasise the importance of including the transformation actions contained in the C&EAP as the key priorities of the Council over the life of the next Council Plan.
- 2.5 To acknowledge that the SDDC In-house Carbon Emission Roadmap is an evolving piece of work and that it will need to be revised after the approval of a new Council Plan and periodically thereafter.
- 2.6 To obtain Committee approval of proposed changes to the Corporate Environment Policy.

### **3 Background detail to this Annual Review**

- 3.1 As part of the Council's commitment to its carbon neutral targets, the Climate and Environment Action Plan (C&EAP) 2021-30 details 57 actions required to reduce the Council's carbon footprint of its in-house services and to support the reduction of the District-wide carbon emissions. These 57 actions are categorised as:
  - Transformation actions (eight) that will reduce the carbon emissions from the largest Council emission sources (e.g. public buildings, fleet and council housing)
  - In-house actions (30) for individual Council Services that will reduce carbon emissions of those emission sources aligned to services (e.g. transitioning grounds maintenance equipment from petrol to battery powered)
  - District-wide actions (19) for individual Council services that will reduce emissions across the whole of South Derbyshire (e.g. embedding carbon emission reduction in the new SDDC Local Plan).
- 3.2 The successful delivery of these 57 actions will achieve the reduction of carbon emissions in line with the Council commitments of becoming a carbon neutral Council by 2030 and supporting South Derbyshire to become carbon neutral by 2050.
- 3.3 The action to review the Council's C&E Action Plan on an annual basis was agreed by this Committee in July 2021.
- 3.4 The review is based on,
  - The results, analysis and comparisons of both in-house and District-wide carbon emissions contained in the SDDC Annual Carbon Reduction Progress Report 2022/23 (attached as Appendix 1).
  - The results and feedback from quarterly meetings with Heads of Service from across the Council that details the progress of the individual Service actions throughout 2022/23.
  - The outcomes of any external audits over the course of the past year.
- 3.5 The review has been published as an Annual Climate and Environment Action Plan Review, and this report is attached as Appendix 2.

#### 4 Key Findings from the SDDC Annual Carbon Reduction Progress Report 2022/23

4.1 SDDC in-house annual carbon emissions (Scope 1 and 2) are summarised in Table 1 below.

**Table 1 – Scope 1 and 2 Emissions**

Year	2018/19	2019/20	2020/21	2021/22	2022/23
SDDC In-house carbon emissions (tCO2e)	2,494	2,154	1,982	2,066	2,074

4.2 The figures illustrate that SDDC In-house carbon emissions have reduced as a direct result of the action that the Council has and is taking. However, progress with reducing carbon emissions over the last two years has stalled.

4.3 The most significant sources of carbon emissions from Council activity are illustrated at Figure 2 (page 6) of the Progress report and Figure 3 (page 7) of the Progress Report.

4.4 Figure 2 of the Progress Report shows that diesel and petrol emissions were the biggest source of carbon emissions in 2022/23 (828 tCO2e), followed by emissions from the use of natural gas for heating (629 tCO2e), then the use of refrigerants for air conditioning (359 tCO2e), then the consumption of electricity (258 tCO2e).

4.5 Figure 3 of the Progress Report shows that by location, the biggest source of carbon emissions was Greenbank leisure centre, followed by other public buildings, followed by Civic way offices. Emissions from the transport fleet or mobile plant are not included in this data.

4.6 The Progress Report also includes a calculation of Scope 3 emissions. Scope 3 emissions are what is estimated to be produced by other suppliers working on behalf of the Council. The Scope 3 emissions calculations are reproduced in Table 2 below.

**Table 2 – Scope 3 Emissions**

Scope 3	2018/19	2019/20	2020/21	2021/22	2022/23
Supply Chain carbon emissions	6,362 tCO2e	6,316 tCO2e	8,223 tCO2e	8,243 tCO2e	8,449 tCO2e

4.7 Scope 3 emissions are over four times higher than direct emissions from Council activity. This highlights the importance of Action ref ISP23 relating to working with our supply chain to help them decarbonise.

4.8 Table 2 above illustrates how Scope 3 emissions have increased over the past five years.

4.9 This data conceals a positive story, in that the increase in Scope 3 emissions is primarily as a result of the extensive work commissioned by the Council to decarbonise both public sector and private sector housing over the last three years.

4.10 The ‘cost’ in carbon emissions from the construction activities to deliver this work will be repaid many times over in future years from the reduction in carbon emissions from the properties which have been improved.

4.11 Table 3 below reproduces the most up to date available estimated change in carbon emissions across all of South Derbyshire.

**Table 3 – District-wide Carbon Emissions**

Sector carbon emissions (kt CO2)	2017	2018	2019	2020
Industry	136	120	112	97
Agriculture	23	25	25	24
Commercial	31	30	28	25
Public Sector	15	15	14	13
Domestic	152	151	149	146
Transport	313	309	310	248
Net emissions (forestry, crops, grass)	-10	-10	-11	-10
Total	660	649	628	542
SDDC Emissions/head tCO2e	6.4	6.2	5.9	4.9

4.12 The data illustrates that there have been meaningful reductions in carbon emissions in all sectors in recent years.

## 5 Key Findings from the Annual Climate and Environment Action Plan Review 2023

5.1 Of the 57 actions contained in the C&EAP, the Council had started or completed 88% of these in 2022/23 and 12% have not been started.

5.2 Achieving net zero is extremely challenging, therefore it is important to celebrate and reflect on successes. The Review has identified and highlighted actions which have delivered carbon reductions, and these are reproduced in Table 4 below.

**Table 4 – Successful Actions in 2022/23**

Actions	Success
Transport	
DSP5 – Public EV Infrastructure expansion	SDDC now have installed 42 EV charge points in six car parks across South Derbyshire, displacing 51.7 tCO2e per year. Funding has also been sourced to install 3 EV charge points at the Boardman Depot (D2N2 Shared charge points) and potential for additional public EV charge points at a further 6 SDDC owned car parks from the DCC LEVI scheme.
DSP7 – Review of Hydrogen supply & infrastructure for transport.	Innovation project funding sourced for reviewing hydrogen supply, storage & refuelling infrastructure at the Boardman Depot for the Council's refuse waste collection trucks.
Buildings and Heating	
T7 – Social Housing decarbonisation scheme	SHDF Wave 1 & 2 funding has been sourced to retrofit over 200 SDDC social houses to improve their EPC ratings to C or above and reduce tenants' energy bills. This programme, when complete is estimated to reduce carbon emissions by 450 tCO2e per year
DSP4 – programme to improve energy efficiency of private and	In 2022/23, 44 privately owned properties have had measures to increase their energy efficiency installed

tenanted houses	which are estimated to reduce carbon emissions by 92.4 tCO <sub>2</sub> e per year. Funding has been secured to continue decarbonising private houses to 2025.
DSP1 - Healthy homes assistance funding programme for private housing energy efficiency measures and supporting fuel poverty reduction	In 2022/23 SDDC have co-ordinated 56 fuel poverty interventions utilising the Healthy Homes Assistance Fund. A further £314k of private sector funding has been delivered to private sector housing energy improvements under the ECO4 Flex eligibility routes.
<b>Biodiversity</b>	
ISP26 – Mapping of all the SDDC owned green spaces	In 2022/23 SDDC has GIS mapped the 862 ha of green spaces owned by it for the purposes of Biodiversity Net Gain programmes and carbon sequestration estimates.
DSP8 – Utilise all tree planting schemes	In 2022/23, SDDC have co-ordinated the planting of 1,777 trees, planted by community groups, residents, and schools. Since 2018/19 over 8,500 trees have been planted, which has the potential to sequester 85 tCO <sub>2</sub> e per year as they mature.
<b>Partnership/Communication</b>	
ISP19 – Engage with local businesses to support carbon emission reduction	In 2022/23 SDDC have engaged with 35 small businesses through South Derbyshire providing decarbonisation expertise. Through the Shared Prosperity Funding the Council has been supporting small business to decarbonise and promote their green economy expertise.
DSP13 – Promoting sustainable travel plans to support job creation	Bus route subsidy for Swadlincote /East Midlands business park, Swadlincote to Mercia Park & Uttoxeter to Dove Valley connections established to support residents, job seekers and sustainable travel.
DSP 19 - Developing a forum for energy consumption reduction advice for South Derbyshire residents	Created a bespoke designated external web page for easy access to continually updates energy consumption reduction advice and tips.
<b>Governance and Finance</b>	
ISP22 – Ongoing identification of carbon reduction funding	Over the last 3 years SDDC has successfully bid for just under £8 million of funding for private sector housing decarbonisation, social housing stock decarbonisation, electric vehicle charge points and innovation funding to support hydrogen low carbon fuels.
<b>Planning and Land Use</b>	
ISP3 - Embedding climate, environment & decarbonisation in the new SDDC Local Plan.	The issues and options consultations included a significant section on climate change and decarbonisation.

- 5.3 The review has identified that five (5) actions have been completed and can be removed from the C&EAP.
- 5.4 From the ongoing quarterly progress reviews with Heads of Service a further ten (10) actions have been identified which will directly or indirectly deliver carbon reductions.
- 5.5 The Review proposes that the five completed action are removed, and the ten newly identified actions are included, in a new iteration of the C&EAP for 2023.

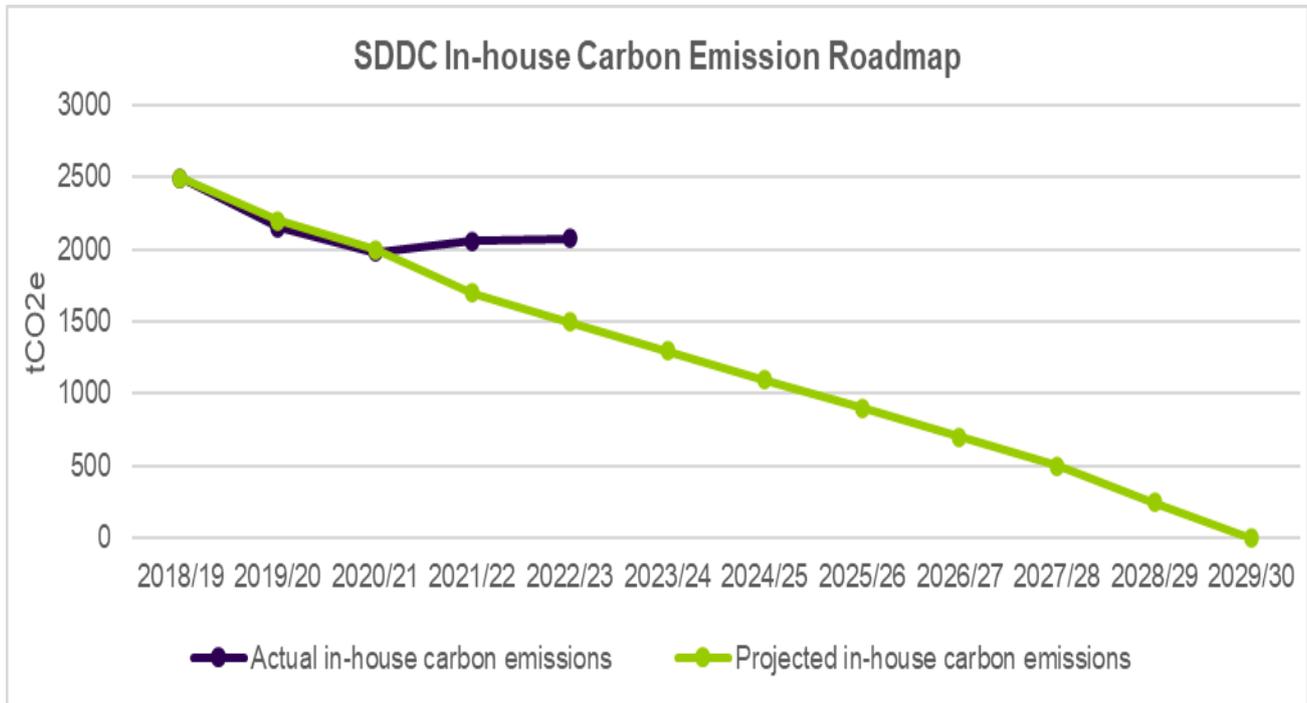
## **6 Transformation Actions and the Council Plan**

- 6.1 The content of both the SDDC Annual Carbon Reduction Progress Report and the Annual Climate and Environmental Action Plan review, highlight the critical importance of six Transformation Actions to the Council achieving net zero by 2030.
- 6.2 The six Transformation Actions are:
- Decarbonising Civic Way offices,
  - Decarbonising Greenbank leisure centre,
  - Decarbonising Etwall leisure centre,
  - Decarbonising the Councils transport fleet,
  - Decarbonising Boardman Road depot,
  - Decarbonising Rosliston Forestry centre,
- 6.3 Achieving these six transformation actions will reduce in-house carbon emissions by an estimated 80%.
- 6.4 None of these actions are currently budgeted.
- 6.5 The developing Council Plan will create the priorities for the Council over the course of the next five years. Therefore the inclusion of these transformation actions into the Council Plan considerations is critical if the net zero ambition is to have a realistic chance of delivery.

## **7 Reprofile the Roadmap to Net Zero**

- 7.1 A profile of the roadmap to net zero was produced in the first C&EAP published in 2020. This profile was produced at a time when the Council had generated the first calculation of its carbon emissions and it was based on an assumption that carbon emissions could be reduced at a consistent rate year on year from 2020 to 2030.
- 7.2 The profile of the roadmap to net zero is therefore a linear downward trend. Figure 1 below illustrates the linear profiled roadmap to net zero along with the actual emissions profile achieved over the last five years taken from the data in Table 1 earlier in this report.

**Figure 1 – SDDC In-House Carbon Emission Roadmap**



- 7.3 As has been described in section 6 of this report, the most significant future carbon emissions reductions will come from the six transformation actions contained in the C&EAP.
- 7.4 All of these transformation actions require large capital spend and when delivered will result in step changes in carbon emissions, rather than the progressive linear reductions assumed in the existing roadmap.
- 7.5 The existing roadmap does not therefore provide an accurate portrayal of the journey which the Council will take to net zero.
- 7.6 Officers propose to revise the roadmap. Given the current uncertainty over the delivery of the six transformation actions it is not possible to accurately reprofile the roadmap. More certainty is expected once the new Council Plan is agreed and approved.
- 7.7 It is therefore proposed to reprofile the roadmap once the Council Plan is complete and to publish it in the Annual Climate and Environment Action Plan Review 2024.

## **8 Corporate Environmental Policy**

- 8.1 South Derbyshire District Council has an accredited Environmental Management System since 2008 and has been certified to the ISO14001 Environmental Management Standard since 2010.
- 8.2 In 2016 the Council became one of the first public bodies in the world to achieve certification to the new ISO14001:2015 version which gave more focus on the improvement of environmental performance rather than the improvement of the management system itself. This version also aimed at making environmental management more comprehensive and relevant to the supply chain. One of the main updates required the Council to consider environmental impact during the entire life cycle. Additionally, the commitments of top management and the methods of evaluating compliance have also been strengthened.
- 8.3 In order to maintain certification, the Council is subject to an annual external audit. The next external surveillance audit is programmed for November 2023.

- 8.4 A central requirement of the ISO14001 standard is that the Council has an Environment Policy. The purpose of the Policy is to demonstrate an organisational commitment to strive to improve environmental performance and provide a framework for doing so that is “*appropriate to the purpose and context of the organisation*” in line with its Environmental Management System.
- 8.5 The Policy was last reviewed in 2021 to reflect the priorities in the 2020-24 Corporate Plan. The format of the Policy was also made consistent with a corporate template.
- 8.6 A recommendation of a recent external audit was that the format of the existing Environment Policy is too ‘busy’ and that it needed to be simplified to fit onto a single page of A4.
- 8.7 The Policy format has therefore been updated to simply it in response to the audit recommendation. The detailed content of the Policy remains largely unchanged.
- 8.8 The 2023 version of the Environment Policy is contained as Appendix 4 to this report.

## 9 Financial Implications

- 9.1 The financial implications of the existing commitments in the C&E Action Plan remain significant.
- 9.2 The total cost of all Transformation Actions (excluding improvements to SDDC housing stock) is estimated to be in the range **£10 – 15 million over the course of the next six years**.
- 9.3 However, the maintenance and improvement of all these assets, irrespective of achieving carbon neutrality, carry embedded costs and therefore an estimate of the additional costs of decarbonisation for each option has been sought.
- 9.4 The total additional cost of including decarbonisation of all the Transformation Actions is estimated to be in the range **£5.6 to 6.8million**. This figure is included in the £10 - £15 million estimate above. These estimates relate to capital costs alone and do not factor in the anticipated long-term reduction in revenue costs associated with reduced fuel use, etc.
- 9.5 There are some existing capital expenditure commitments from reserves which relate to the transformation actions.
- 9.6 Officers involved in the implementation of the C&EAP and those involved in the implementation of existing capital expenditure commitments will collaborate to ensure that the delivery of the existing commitments can be aligned as closely as possible with the carbon neutral aspirations.
- 9.7 The estimated total cost of the non-transformation actions in the C&EAP to reduce in-house carbon emissions is £743k, with an estimated requirement of 4,730 employee hours.
- 9.8 Currently £315k and 3,350 employee hours to deliver these actions are uncommitted. This estimate does not include the cost of replacing existing fluorinated gases in air conditioning and heat pump plant for which an accurate figure is not yet available. Fluorinated gases are powerful greenhouse gases, with a global warming effect much greater than carbon dioxide.

- 9.9 The estimated cost of the of the non-transformation actions in the C&EAP to continue the decarbonisation of South Derbyshire as a District is £1,346,000, along with an estimated requirement of 6,000 employee hours.
- 9.10 Currently £43k and 2,000 employee hours to deliver these actions are uncommitted.
- 9.11 The additional actions proposed to be included if this report is approved will cost an estimated £100,000 and 5,500 employee hours.
- 9.12 All of the proposed new actions included in the revised C&E Action Plan have been agreed with the respective Heads of Service and appropriate funding has been secured and resources have been allocated.
- 9.13 The co-benefit of the large investment required to deliver these Transformation actions is that they all result in significant reductions in energy consumption and consequential reductions in operating costs.

## **10 Corporate Implications**

### **Employment Implications**

None

### **Legal Implications**

None

### **Corporate Plan Implications**

The C&E Action Plan 2021-30 and the recommendations of this Committee Report meet the Corporate Plan key aims of:

- Striving to make South Derbyshire District Council carbon neutral by 2050
- Working with residents, business, and partners to reduce their carbon footprint.
- Encourage and support business development and new investment in the District.

### **Risk Impact**

The recommendations will have a beneficial mitigating action against the corporate risk of 'Managing the environmental impact of incidents across the District'.

## **11 Community Impact**

### **Consultation**

None

### **Equality and Diversity Impact**

One of the recommendations of the C&EAP is that a full Equality, Diversity and Inclusion Impact study should be completed in 2023/24 to understand and act on the impact of climate and environment change.

### **Social Value Impact**

Beneficial

## **12 Conclusions**

As the Council's current Climate Change strategy, aspirations and commitments are aligned to reducing emissions from the Councils own activity to carbon neutral by 2030 and supporting partners to reduce the districts carbon emission to carbon neutral by 2050, it is recommended that the council endorses the changes to the C&E Action Plan 2021-30 for the 2023/24 period.

## **13 Background Papers**

Appendix 1 – Annual Carbon Reduction Progress report (2021/22)

Appendix 2 – Climate and Environment Action Plan Review 2022

Appendix 3 – Proposed revision to the Climate and Environmental Action Plan 2021-30

Appendix 4 – 2023 Environment Policy.

[Climate and Environment Strategy 2020](#)

[Climate and Environment Action Plan 2021 -2030](#)

# SDDC

# Annual Carbon Reduction Progress Report

**Project:** Climate and Environment Action Plan 2021-30

**Team:** Environmental Services

**Date:** June 2023

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## Version Control

Version	Description of version	Effective Date
0.1	DRAFT	May 2023

## Approvals

Approved by	Date
Matt Holford, Head of Environmental Services	13/06/2023

## Associated Documentation

Description of Documentation	
Climate and Environment Strategy	2019
Climate and Environment Action Plan 2021-30	2021 -2030
UK local authority and regional CO2 emissions national statistics	2015 - 2019

## Executive Summary.

Carbon emissions are a direct result of energy (fossil fuel) consumption. By supporting the reduction of energy consumption, South Derbyshire District Council’s (SDDC) have the potential to meet their carbon reduction commitments with the co-benefit of significantly reducing their energy costs.

This 2023 Annual Carbon Report details and estimates the main carbon emission sources resulting from the Councils direct activity (In-house) and those resulting from the whole of South Derbyshire (District-wide) during the 2022/23 financial year.

The estimation and analysis of both In-house and District-wide carbon emissions helps to evidence the effectiveness (or otherwise) of the delivery of the SDDC’s Climate and Environment Action Plan (2021-30) and the progress the Council is making towards its carbon neutral targets.

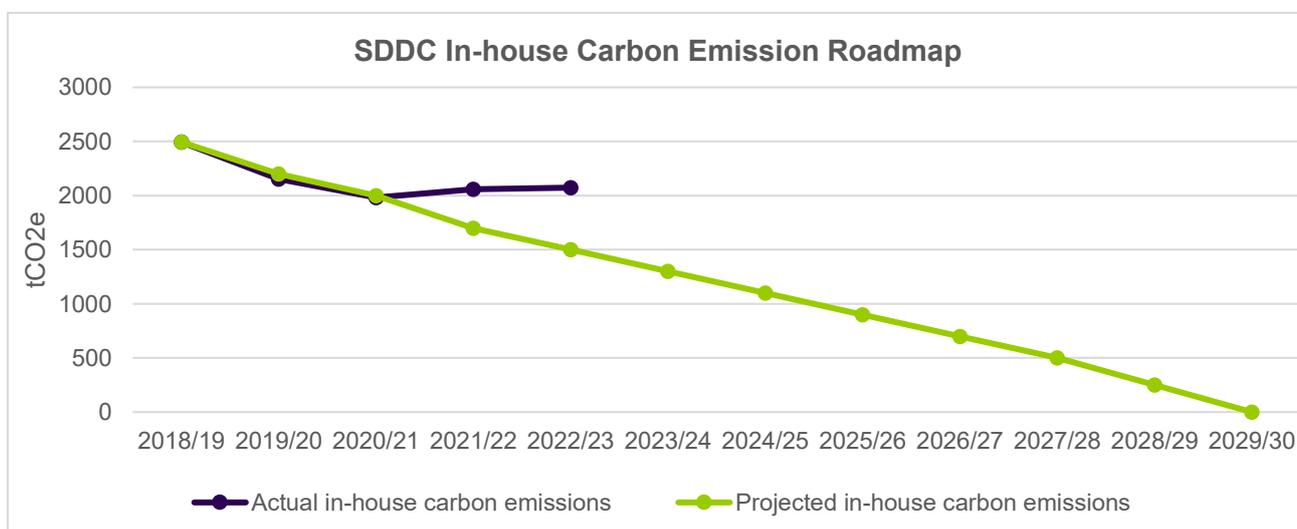
### In-house carbon emissions for 2022/23 – summary

The annual In-house carbon emissions resulting from the Council’s own activity (heat, refrigerants, electricity across the public estate and vehicle fleet fuel) for 2022/23 is **2,074 tonnes of carbon dioxide (CO2e)**, which is 420 tCO2e (17%) below the baseline year of 2018/19. This is a direct result of the Climate and Environment actions that the Council is taking. The table below shows the annual In-house carbon emissions for each year, from 2018/19 to 2022/23.

Year	2018/19	2019/20	2020/21	2021/22	2022/23
SDDC In-house carbon emissions (tCO2e)	2,494	2,154	1,982	2,066	2,074

Although SDDC’s In-house carbon emissions have reduced as a direct result of the actions the Council have and are taking, these reductions have flatlined over the last two years. The flatlining of the last two years illustrate that to further reduce In-house carbon emissions the Council needs to tackle the high emission sources (public buildings, leisure centres and vehicle fleet) detailed later in this report.

The graph below shows the projected Council’s roadmap to carbon neutral by 2030 (green line) compared to the actual reduction in carbon emissions (blue line). This illustrates this flatlining effect and demonstrates the scale of the challenge required over the next seven years. The Councils stated



aim is to reduce its In-house carbon emissions by 2,074 tCO<sub>2</sub>e per year to meet its carbon neutral target by 2030.

**District-wide carbon emissions for 2022/23 – summary.**

The Council has committed to supporting residents, businesses, households, and the travelling public to reduce carbon emissions across the South Derbyshire District to carbon zero by 2050. The UK local authority greenhouse gas emissions national statistics are published by the Department for Energy Security and Net Zero (DESNZ) and the table below shows the latest District-wide carbon emissions resulting from all sectors are 542,000 tCO<sub>2</sub>e which has reduced by just over 16.5% from the 2018 baseline.

Year	2017	2018	2019	2020
SDDC District-wide carbon emissions (tCO <sub>2</sub> e)	660,000	649,000	628,000	542,000

The Council is currently taking direct action to support the reduction of District-wide carbon emissions through the work it is doing around the energy efficiency of houses, the installation of an electric vehicle charging network and the actions around improving the natural capital across South Derbyshire through tree planting and green space habitat improvement actions.

This report is the first time that SDDC have attempted to estimate the carbon emission reduction from direct District-wide action. There is no approved and verified methodology for this calculation, therefore the data is presented with some caution. However, it is important to at least estimate the impact that the Council is having in installing EV charge points, developing tree planting schemes and improving and tracking habitat gain in the green spaces it owns (see Appendix 6). This has the potential to help deliver the Council’s commitments for supporting South Derbyshire to be carbon neutral by 2050.

Later in this report the main in-house emission sources and district-wide emission sectors are identified and linked to the actions that are or need to be delivered to ensure the Council meets its commitments.

Finally, the report summarises recommendations for the next steps that should be included in the annual review of the Climate and Environment Action Plan to increase its effectiveness.

**1. Context**

South Derbyshire District Council (SDDC) has a key role to play in tackling climate change, setting out clear aspirations and commitments to reduce carbon emissions across South Derbyshire.

As part of these commitments, SDDC has been collating and monitoring its annual in-house and district-wide carbon emissions since 2018/19 (emission baseline) to evaluate the progress of delivering its Climate and Environment Action Plan (2021-30).

The Councils In-house carbon emissions are calculated using the Local Government Associations (LGA) reporting guidance and the District-wide carbon emissions are obtained from the UK Government’s National Statistics that were last published in 2022 for the 2005 to 2020 period.

In line with the DEFRA Environmental Reporting Guidelines and the Department for Business, Energy, and Industrial Strategy (BEIS) (2020) reporting guidance, Council in-house carbon emissions are categorised into Scope 1, Scope 2, or Scope 3 emissions, as detailed below:

**Definition of In-house Scope 1, 2 and 3 Emissions**

Category	Description	Energy consumption source
Scope 1	Direct emissions – directly controlled by Councils.	Metered heat (gas) consumed for public buildings. Refrigerants used for public buildings. Fuel used in SDDC vehicle fleet
Scope 2	In-direct emissions – directly controlled by Councils	Metered electricity – emissions from producing the electricity.
Scope 3	In-direct emissions – only influenced by Councils	Grey mileage – employee business mileage Employee mileage commuting to work. Water and wastewater usage Waste disposal Supply chain – purchased goods and services

**2. SDDC In-house Carbon Emission Reporting (Scope 1, 2 and 3)**

The In-house carbon emissions detailed in this annual report are based on the Council’s energy consumption during the financial year 2022/23 and are calculated as tonnes of equivalent carbon dioxide (CO2e). The Council monitors, tracks, and reports on Scope 1, 2 and 3 carbon emissions, although its In-house carbon neutral commitments are confined to Scope 1 and 2 only. The breakdown of In-house (Scope 1, 2 and 3) carbon emissions which result from the activities that the Council is in control of and are shown in Table 1 below.

**Table 1: Scope 1,2 & 3 Annual Carbon Emissions by emission source**

tCO23	Scope 1			Scope 2	Scope 1 & 2	Scope 3				Scope 3	Scope 1, 2 & 3
	Heat	Cooling	Fleet	Electricity	Total	Grey Fleet	Commuting	Waste/ Water	Supply chain	Total	Total
2018-19	811	485	722	476	<b>2,494</b>	54	86	30	6,192	<b>6,362</b>	8,857
2019-20	651	348	742	414	<b>2,154</b>	54	86	31	6,145	<b>6,316</b>	8,471
2020-21	492	351	837	294	<b>1,982</b>	27	39	26	8,131	<b>8,223</b>	10,205
2021-22	655	359	818	238	<b>2,066</b>	36	40	19	8,148	<b>8,243</b>	10,308
2022-23	629	359	828	258	<b>2,074</b>	24	40	22	8,414	<b>8,499</b>	10,573

**Progress of SDDC’s In-house carbon emission reduction (Scope 1,2 & 3):**

Progress is measured relative to the 2018/19 emission baseline (2,494 tCO2e), main highlights are:

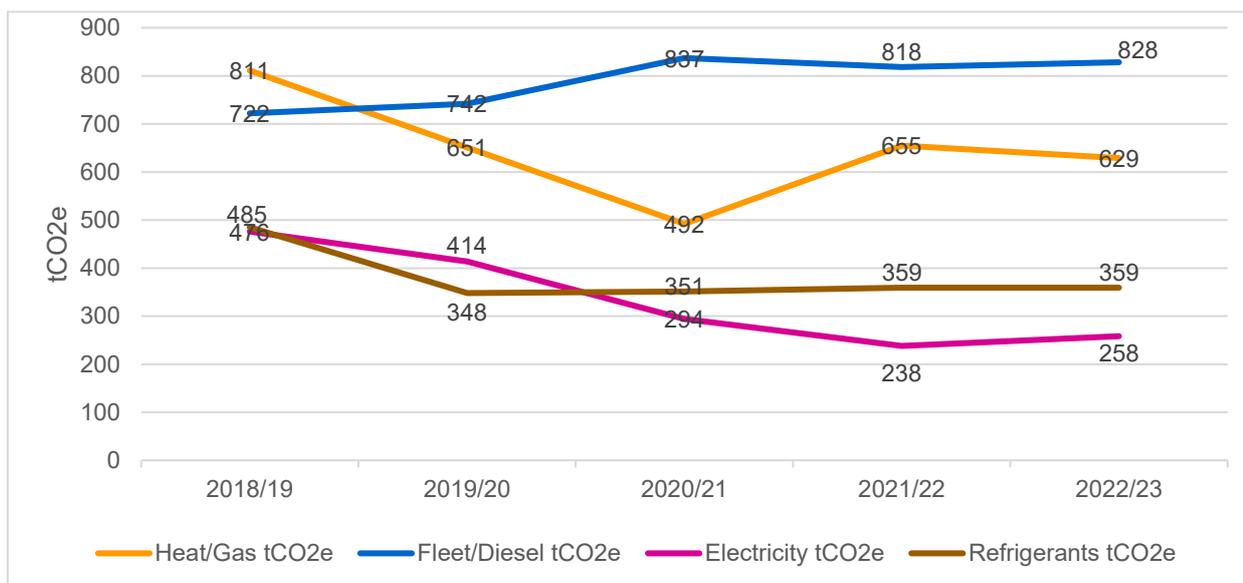
- Scope 1 & 2 annual carbon emissions (SDDC commitment)
  - Have reduced by 426 tCO2e (17%) compared to the 2018/19 emission baseline.
  - Have increased by 8 tCO2e (0.4%) from 2021/22 due to the increase in fleet fuel and overall electricity use.

- Are up 92 tCO<sub>2</sub>e (4.6%) compared to lockdown year.
- To achieve carbon neutral by 2030 SDDC needs to reduce its in-house carbon emissions by a yearly average of 296 tCO<sub>2</sub>e from 2023 to 2030.
- Scope 3 annual carbon emissions
  - Grey fleet (employee business mileage) has reduced by 33% on prior year – probably driven by significant increases in fuel price.
  - Supply chain carbon emissions are increasing year on year, primarily a result of the increase in housing decarbonisation work being completed by the Council over the last few years. These works generate a short-term increase in carbon emissions but will deliver much bigger long term savings in carbon.

## 2.1 The main SDDC In-house carbon emission sources (Scope 1 and 2)

The total SDDC in-house carbon emissions (Scope 1 and 2) shown in Table 1 are from all the main operational areas of energy consumption under Council control (fleet vehicle fuel, heat/gas, electricity, and refrigerants from public buildings). The SDDC In-house carbon emissions sources are illustrated in Figure 2 below:

**Figure 2: Source Specific Scope 1 and 2 Emissions**



### Progress of the main SDDC In-house carbon emission sources:

Progress of each of the individual In-house carbon emission sources above as compared to the 2018/19 emission baseline, are:

- Heat/gas emissions have reduced (4%) compared to prior year and is 22% lower than the 2018/19 baseline, largely due to actions taken to reduce gas consumption at the Leisure Centres.
- The vehicle fleet emissions have increased by 1.2% compared to prior year and are up by 15% on the baseline year. This is largely due to the increase in the number of refuse collection

vehicles required by bringing in control of previously outsourced contracts. Fleet emissions are the Council’s largest In-house carbon emission source.

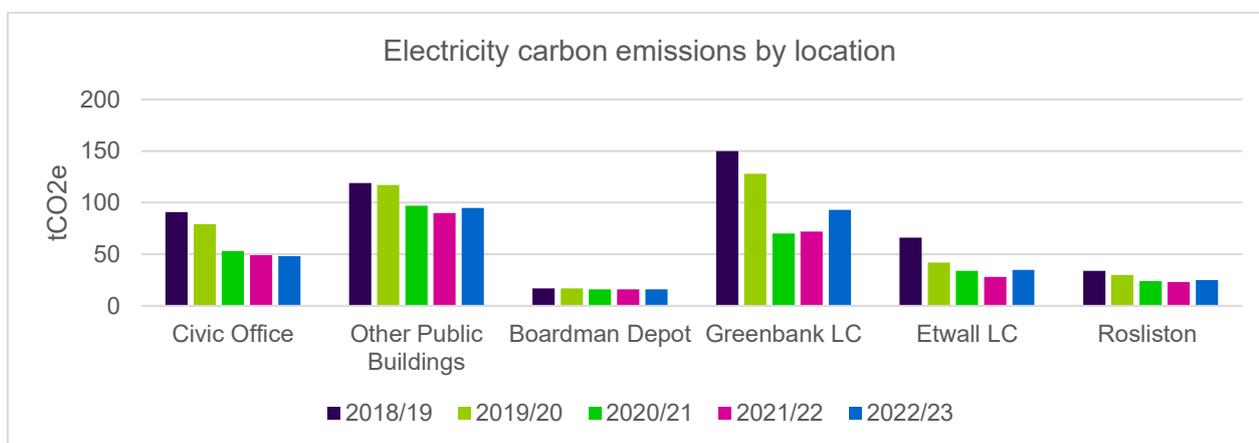
- Emissions from refrigerants are the same as prior year and stable.
- Emissions from electricity use have increased slightly (8%) compared to prior year but are significantly below (47%) the baseline year.
- Apart from the vehicle fleet, all other carbon emission sources have kept significantly below the pre-Covid levels.

Between 2019 and 2021, Covid19 lockdowns significantly reduced carbon emissions as most employees worked from home and residents were in lockdown. This significantly reduced the heating and electricity consumption in all public buildings, especially the two leisure centres at Greenbank and Etwall. During 2021 to 2023, as employees and residents find the new ‘normal’, energy consumption has increase slightly as new hybrid working develops and residents return to the leisure centres, resulting in slight growth in carbon emissions post Covid.

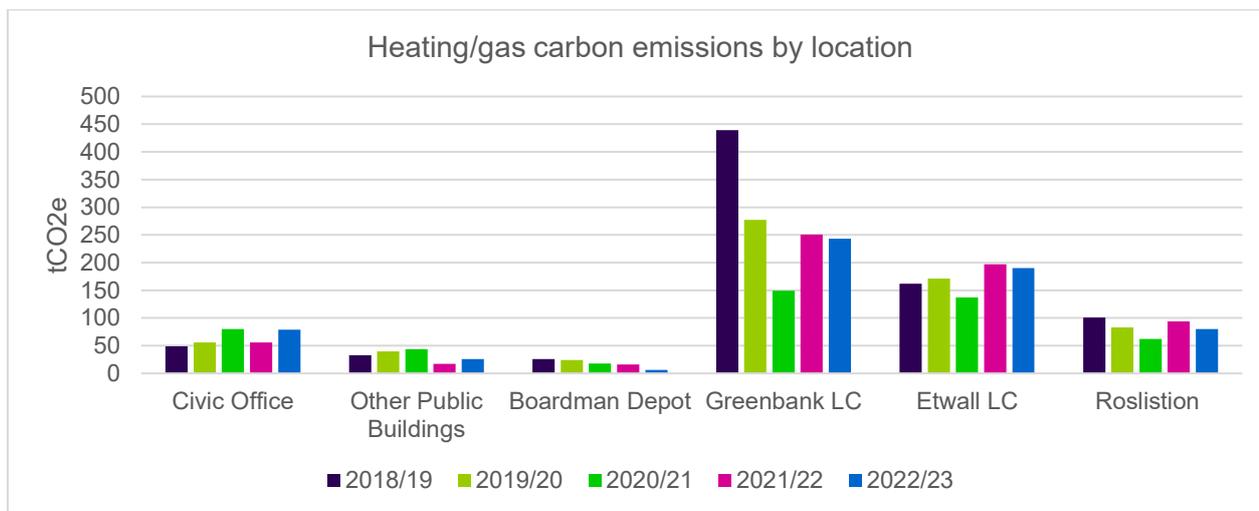
### 2.2 Public Building carbon emissions by location (Scope 1 and 2)

As well as showing the carbon emission sources, this report details the carbon emissions by the main individual high emitting public building locations. The combined carbon emissions from the heating and powering of public buildings (gas, electric and refrigerants) contribute 60% of the Council’s in-house totals. Reducing the energy consumption of individual high energy consumption public buildings has a significant impact on emission reductions as well as reducing the operating energy costs. Figures 3 and 4 below show the comparisons between the main Council public buildings:

**Figure 3: Annual Electricity Carbon Emissions by Building**



**Figure 4: Annual Natural Gas Carbon Emissions by Building**



**Progress of carbon emissions reduction from the high gas/electric public buildings:**

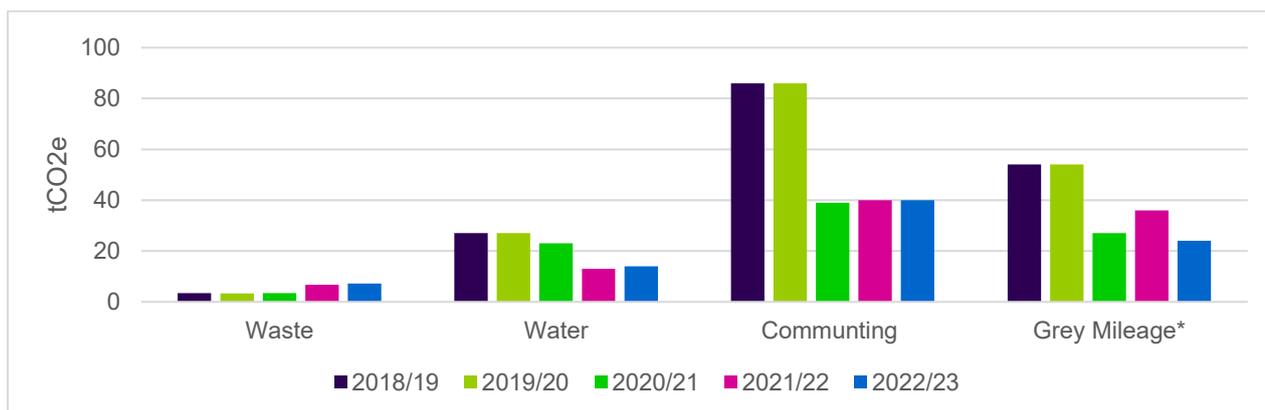
Energy consumption is a significant operational cost to the running of all the Council’s public estate, especially the individual buildings identified in this report. Gas consumption at the six operational locations emits approximately three times the amount of carbon as that caused by electricity consumption.

- Electricity carbon emissions from high consuming buildings
  - Overall electric emissions from all high consuming buildings have shown significant reductions from the baseline year.
  - The two Leisure Centres have shown increases in electric emissions on prior year.
- Heating/gas carbon emission
  - All buildings have been showing reductions of heating/gas emissions apart from the Civic Offices, whose heating/gas emissions have increased on prior year as more employees are working at the offices compared to Covid lockdown.
  - Heat/Gas emissions at the Leisure Centres have reduced slightly on prior year because of direct action being taken to reduce heat/gas consumption (pool covers, pool temperatures, etc)
  - Although the heat/gas consumption of the Leisure Centres has reduced slightly on prior year, they are by far the highest gas consuming locations because of the high energy demands of swimming pools and the low energy efficiency of the buildings, especially Greenbank.
- Overall, the Leisure Centre’s are by far the highest carbon emitter locations.
  - Each Leisure Centre on average uses double the amount of electricity and triple the amount of heating/gas than the Civic Offices.
  - Carbon emissions from heating/gas in the Leisure Centre’s are double that of electricity emissions.
  - Both Leisure Centres reduced emissions in the first year of Covid lockdown but increased significantly in the second year as they opened to the public.
  - Heating/gas of the two Leisure Centres are the most significant single contributors to the Council’s in-house carbon emissions after those of the vehicle fleet.

### 2.3 Scope 3 In-house carbon emission sources

Scope 3 in-house carbon emissions can only be influenced by the Council, unlike Scope 1 and 2 emissions that can be directly controlled. The Scope 3 carbon emissions can be split into those connected to the Council’s activities (waste, water, commuting and grey fleet mileage) and those emissions resulting from the Council’s procurement of goods and services from its supply chain. Figure 5 below shows the Scope 3 emissions resulting from the Councils waste, water consumption, employee commuting and grey mileage (employees business mileage).

**Figure 5: Scope 3 carbon emissions resulting from Council in-house activities**



Grey Mileage\* is the SDDC business mileage of employees using their own vehicles.

The other element of Scope 3 carbon emissions is those resulting from the SDDC Supply Chain. These scope 3 emissions are generated by other supplier organisations as part of the process of providing goods and services to the Council. The table below shows the estimated carbon emissions from the Council’s supply chain over the last four years.

**Table 6: Estimated scope 3 Supply Chain Emissions**

Scope 3	2018/19	2019/20	2020/21	2021/22	2022/23
Supply Chain carbon emissions	6,362 tCO2e	6,316 tCO2e	8,223 tCO2e	8,243 tCO2e	8,449 tCO2e

**Progress of reducing Scope 3 carbon emissions:**

- Scope 3 emissions from waste, water, commuting and grey mileage:
  - All these scope 3 carbon emissions reduced because of the Covid19 lockdown.
  - Carbon emissions from employees commuting to work has reduced by over 50% for the past two years because of Covid lockdown and working from home.
  - Grey mileage emissions have reduced by 33% over prior year, most likely to be driven by different ways of meeting (MS Teams etc) and the significant increase in fuel prices.
  - Carbon emissions from water have reduced with increased numbers of employees working from home.
- Scope 3 Supply Chain emissions
  - Supply chains emissions are, over three times the size of the Council’s total In-house scope 1 & 2 carbon emissions.

- Supply Chain carbon emissions are increasing year on year.
- The increases in 2020/21 to 2022/23 are a result the additional building sector works that are being delivered to support the decarbonisation of social and residential housing by Novus, Westville & Renuvo. Construction and building sector activity are one of the highest carbon emission sectors. Ultimately this work will deliver long term carbon savings.

### 3. South Derbyshire District-wide carbon emission reporting

The South Derbyshire area has a carbon footprint that results from the activity of district-wide businesses, transport, buildings, homes, households, residents and all the vehicles travel across the district. The Council as part of its carbon neutral targets has committed to support the reduction of these district-wide emissions to carbon neutral by 2050 in line with the UK Governments legislation.

#### 3.1 The main District-wide carbon emission sources

Local Authority district-wide carbon emission reporting is completed by the Office of National Statistics and gives the annual carbon emissions in ktCO<sub>2</sub> categorised into the sectors whose activities result in carbon emissions.

The South Derbyshire District-wide carbon emissions are categorised into the main carbon emission sectors of Industry, Commercial, Public Sector, Domestic Transport and Land use and are shown in Table 7 below:

**Table 7: District-wide Carbon Emissions Sources (kt CO<sub>2</sub>e)**

Sector carbon emissions (kt CO <sub>2</sub> )	2017	2018	2019	2020
Industry	136	120	112	97
Agriculture	23	25	25	24
Commercial	31	30	28	25
Public Sector	15	15	14	13
Domestic	152	151	149	146
Transport	313	309	310	248
Net emissions (forestry, crops, grass)	-10	-10	-11	-10
<b>Total</b>	<b>660</b>	<b>649</b>	<b>628</b>	<b>542</b>
<b>SDDC Emissions/head tCO<sub>2</sub>e</b>	<b>6.4</b>	<b>6.2</b>	<b>5.9</b>	<b>4.9</b>

(Local Authority territorial CO<sub>2</sub> emissions – GOV.UK)

#### Progress of reducing District-wide carbon emissions:

The Council’s Climate and Environment Action Plan (2021 - 2030) has 18 specific actions for delivering carbon emissions reduction across the district. These range from supporting households to make their homes more energy efficiency, developing an electric vehicle charging infrastructure, running tree planting schemes, improving the districts natural habitats to engaging with business and community groups to advise and encourage carbon reduction measures. The carbon emission reductions from the Council delivering these district-wide actions are detailed in the Appendix and support the progress in carbon emission reductions shown in the table above:

- District-wide carbon emissions have reduced by 4.4% since 2017/18
- Largest reduction of carbon emission source is the Commercial sector.

- Highest carbon emission sources in South Derbyshire are the Transport sector and the Domestic (Residential) sectors.
- Lowest carbon emission source in South Derbyshire is Agriculture sector, although it is showing no decrease in emissions year-on-year.
- The carbon sequestration by natural sources is increasing year-on-year.
- Overall, the South Derbyshire emissions/population head on average is reducing year-on-year.

In terms of comparisons with other local authorities, table 8 below shows the total carbon emissions and the emissions per head of all other district councils in Derbyshire:

**Table 8: Derbyshire Annual Carbon Emissions Estimate (1.2 Local Authority territorial CO2 emissions – GOV.UK)**

Local Authority	Total emissions (ktCO2e)			Emissions/Head of population		
	2018	2019	2020	2018	2019	2020
South Derbyshire	649	628	542	6.2	5.8	4.9
N E Derbyshire	510	497	435	5.0	4.9	4.3
High Peak	2,855	2,875	2,667	30.9	30.7	28.8
Erewash	536	514	464	4.6	4.5	4.0
Derbyshire Dales	519	501	436	7.2	6.9	6.0
Chesterfield	445	431	396	4.3	4.1	3.8
Bolsover	945	929	824	11.9	11.5	10.1
Amber Valley	647	629	566	5.1	4.9	4.4
Derby	1,184	1,109	1,021	4.6	4.3	4.0
Derbyshire CC	7,108	7,004	6,329	8.9	8.7	7.8

**Highlights of district-wide emissions compared to other local authorities:**

- The latest figures shows that South Derbyshire is responsible for 542,000 tCO2e annual carbon emissions (270 times more than the Councils In-house emissions).
- District wide carbon emissions have reduced by 16% since the baseline year of 2018/19
- Carbon emissions are reducing in all areas of Derby and Derbyshire year on year.
- Carbon emissions in South Derbyshire have reduced per head of population by 21% since 2017/18, one of the highest across Derbyshire.
- South Derbyshire has the fifth highest carbon emissions in Derbyshire, after High Peak, Bolsover, Derby City and Amber Valley.

**4. Overall Achievement Summary**

Although SDDC must make some key decisions around the decarbonisation of their public buildings, leisure centres and vehicle fleet, there are some major achievements in their approach to reducing their In-house and District-wide carbon emissions.

**In-house progress summary.**

Achievement	Summary
Council tracking carbon emissions	Annual in-house Scope 1, 2 and 3 emissions tracked, and 2018/19 emission benchmark established.

Council Annual Carbon Reporting established.	This is the second Annual in-house and District-wide carbon emission report, showcasing established governance.
Overall in-house carbon emissions have reduced year-on year	Against 2018/19 benchmark, the 2022/23, the In-house scope 1 & 2 carbon emissions have reduced by 17%
Most of the in-house Scope 1 and 2 emissions are reducing year-on-year	Emissions from heat/gas, refrigerants and electricity have all reduced significantly from the 2018/19 baseline. Only fleet vehicle emissions have increased.
Most in-house Scope 3 emissions are reducing year-on year	Emissions from waste, water, employee commuting and grey fleet are showing reductions from the baseline year.
District-wide emissions are reducing year-on year	District-wide emissions have reduced by 4% since the 2017/18 benchmark
SDDC has started to track Scope 3 Supply Chain emissions	Scope 3 Supply Chain carbon emissions are over three times the size of SDDC in-house emissions
District-wide emissions per head of population are reducing	Emissions per head of population have reduced by 23% from the 2017/18 benchmark.
Compared to other districts in Derbyshire	The total emissions of South Derbyshire are the fifth highest in Derbyshire, the reduction in emissions per head of population is one of the highest.

### District-wide progress summary

Achievement	Summary
District-wide emissions are reducing year-on year	District-wide emissions have reduced by 4% since the 2017/18 benchmark
District-wide emissions per head of population are reducing	Emissions per head of population have reduced by 23% from the 2017/18 benchmark.
Compared to other districts in Derbyshire	The total emissions of South Derbyshire are the fifth highest in Derbyshire, the reduction in emissions per head of population is one of the highest.
The Council has installed 42 EV charging bays across South Derbyshire.	The annual carbon displaced is 51.7 tCO <sub>2</sub> e (the equivalent amount of carbon that would result from using a petrol/diesel car).
The Council has retrofitted a total of 42 private homes throughout South Derbyshire using the LAD/HUG funding schemes	This has led leading to more energy efficient homes and a carbon emission reduction of 92.4 tCO <sub>2</sub> e
Tree Planting Schemes	Since 208/19 SDDC has co-ordinated the planting of 8,577 tree saplings that has the potential to sequester (absorb) 86 tCO <sub>2</sub> per year

Although SDDC still has a long way to go to achieve carbon neutrality, this 2022/23 Annual Carbon Report illustrates that SDDC has established progress in reducing and supporting its In-house and District-wide carbon emission reduction journey.

## 5. Recommendations

This Annual Carbon Report also demonstrates what else needs to be done to ensure the carbon neutral targets and commitments will be met. The following recommendations and next steps are required to support SDDC’s carbon neutral journey:

Recommendations	Next Steps
<p>That management, leadership and elected members understand and are aware of the Council’s high carbon emitting sources and locations for both In-house and District-wide carbon emissions.</p> <p>That the above stakeholders are also aware of which emission sources are reducing, static or increasing on an annual basis because of the Council’s activity.</p>	<p>That management, leadership and elected members are aware that without the reduction of these high emitting sources/locations, SDDC will not meet its carbon neutral commitments.</p> <p>Council decisions will have to be made on the next steps required for these sources and locations if the carbon neutral commitments are to be met.</p>
<p>Stakeholders are aware of the individual highest carbon emission sources resulting from the Council’s In-house activities:</p> <ul style="list-style-type: none"> <li>• Vehicle Fleet</li> <li>• Heat/Gas consumption in public sector buildings</li> </ul>	<p>The replacement vehicle fleet transitions to low or zero carbon over the next 8 years.</p> <p>The public sector buildings identified as high emission sources need retrofitted energy efficiency measures, low carbon heating installed &amp;/or where appropriate the development of new zero carbon buildings.</p>
<p>Stakeholders are aware of the highest carbon emission SDDC locations in priority order of carbon emissions:</p> <ol style="list-style-type: none"> <li>1. Greenbank Leisure Centre</li> <li>2. Etwall Leisure Centre</li> <li>3. Civic Offices</li> <li>4. Rosliston Forestry Centre</li> <li>5. Boardman Depot</li> </ol>	<p>Council decisions need to be made on the decarbonisation of these locations and plans for renewable energy sources and energy efficiency measures need to be developed for each of these locations.</p> <p>Level of investment required to decarbonise will need to be established.</p>
<p>Stakeholders are aware of the scale of Scope 3 Supply Chain carbon emissions.</p>	<p>To establish next steps for tackling the Supply Chain emissions</p>
<p>Stakeholders are aware of the largest District-wide carbon emission categories</p>	<p>Ensure the actions that SDDC are taking are aligned to the largest District-wide carbon emission sectors for South Derbyshire</p>
<p>Stakeholders are aware of the carbon emission tracking of the actions that SDDC are taking across the district and the positive impact these are having in supporting the district-wide</p>	<p>Verify the methodology of carbon emission estimation and the potential to use these carbon emission reductions in any offsetting process.</p>

commitments to carbon neutrality by 2050 – see Appendix 6	
Stakeholders are aware of how other Districts are reducing their district-wide emissions	Compare SDDC District-wide actions with all other Districts to include any specific best practice actions SDDC are missing.
That this Annual Carbon Report is used in reviewing individual decarbonisation actions & their effectiveness. This evaluation is then used in the annual update of the Climate & Environment Action Plan	Feed recommendations and learnings of this Report into the Climate and Environment Action Plan reviewing programme.

## 6. Appendix - District Wide Carbon Emission Reductions through SDDC Action

This is the first year that SDDC have started to monitor the carbon emissions reductions / displacement resulting from the delivery of the main district wide actions. These direct actions that the Council is taking within the Transport Sector, the Domestic (residential) Sector and the Net Emissions (carbon sequestration) Sectors are detailed below:

### SDDC owned EV charge points – District-wide carbon emissions displaced

Over the last two years, the Council has installed 42 charging bays, the table below shows the quantity of carbon displaced, based on the charge point usage at each charge point.

The annual carbon displaced is the equivalent amount of carbon that would result from a petrol/diesel car.

In 2022/23 the installation & use of EV charge points across South Derbyshire has supported the displacement of 51.7 tCO<sub>2</sub>e.

Car Park	2021/22	2022/23
Bus Station	6329	29,139
Rink Drive	8363	10,797
Arnold Close	204	1067
Hilton	0	6508
Hatton	0	3532
Melbourne Assembly Rooms	0	705
<b>Total carbon (kgCO<sub>2</sub>e) displaced</b>	<b>14896</b>	<b>51,748</b>
<b>Annual Carbon displaced (tCO<sub>2</sub>e)</b>	<b>14.9</b>	<b>51.7</b>

### Housing retrofit programme – District-wide carbon emissions reduced

SDDC are delivering a few funding schemes (LADs/HUGs) that are supporting residents (private homeowners and private rentals) to retrofit energy efficiency measures. There are several caveats around these schemes including the main ones of householder income being less than £30k and the homes must have an EPC rating of D or higher, with the aim that the efficiency measures selected will get them to an EPC rating of C.

The reduction in EPC ratings increase the energy efficiency and reduces the carbon emissions from heating these homes.

Throughout the 2022/23 financial year a total of 42 private homes throughout South Derbyshire were retrofitted through these schemes, leading to more energy efficient homes and a carbon emission reduction of 92.4 tCO<sub>2</sub>e

SDDC are also delivering a scheme to reduce carbon emission and improve thermal efficiency in its own housing stock through the Social Housing Decarbonisation Fund (SHDF). The first phase of this scheme is nearing completion at the time of the production of this report and funding has been approved for a SHDF Phase 2. No data is currently available for the carbon savings achieved through SHDF Phase 1, although they can reasonably be assumed to of a similar magnitude to those achieved in the private sector.

### Tree Planting Programme – carbon sequestration (carbon emissions removed)

Every year SDDC deliver a tree planting programme (the ‘Free Tree Scheme’), the table below shows the number of trees planted per year. Although the science of how trees sequester carbon is established, the estimations of carbon sequestered per tree is complex and varies on age, density of woodland, tree species and climate. There are no specific or verified calculations around this emerging analysis, but a typical ‘rule of thumb’ estimation is that a tree will sequester 10kgs per tree per year for the first 20 years of its life.

Since commencing the tree planting in the base year of 2017/18, the tree planting schemes now have the potential to sequester (soak up) 85.78 tCO<sub>2</sub>e per year.

	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	Total
Trees Planted	610	1,733	1,490	1,280	1,687	1,777	8,577
CO <sub>2</sub> sequestration per year (kg)	6,100	17,330	14,900	12,800	16,870	17,770	85,770
SDDC Tree sequestration cumulative Total per year (tCO <sub>2</sub> e)	6.1	23.43	38.33	51.13	68.0	85.78	

### SDDC owned Green Spaces – carbon sequestration (carbon emission removed)

SDDC owns and manages 862.56 hectares of green spaces across South Derbyshire of varying habitat types. Green spaces (natural habitats) play a vital role in tackling climate change as healthy

ecosystems soak up (sequester) significant amounts of carbon by the vegetation or surrounding soils.

Natural England have completed a review of evidence (NERR094) and have collated carbon flux sequestration coefficients by various habitats that have been used in the following calculations. Where no carbon flux coefficients have been established for certain habitats, the carbon sequestration has been zeroed.

Habitats	Area (m <sup>2</sup> )	Flux coefficient (tCO <sub>2</sub> e ha y)	Carbon sequestered (tCO <sub>2</sub> e)
h2a - Hedgerow (priority habitat) (m)	28.05	-1.99	-0.06
h2b - Other hedgerow (m)	865.8	-1.99	-1.72
g1- Other Lowland Grassland (m <sup>2</sup> )	3268.97	0	0
g3a- Lowland neutral meadow (m <sup>2</sup> )	6585.35	0	0
g3c- Other neutral grassland (m <sup>2</sup> )	133044.28	0	0
g4- Modified grassland (m <sup>2</sup> )	140777.03	-0.36	-50.68
h3h- Mixed scrub (m <sup>2</sup> )	14223.99	0	0
f2e-Reedbeds (m <sup>2</sup> )	924.7	-12	-11.1
f2f- Other fen marsh and swamp (m <sup>2</sup> )	1713.52	-0.93	-1.59
w1g6-Line of trees (m)	395.84	-1.99	-0.79
w1d-Wet woodland (m <sup>2</sup> )	11057.87	n/a	0
w1g- Other woodland (broadleaved) (m <sup>2</sup> )	442691.25	-7	-3099
w1g- Other woodland (broadleaved) (m <sup>2</sup> )	36110.48	-11	-397.2
w2b- Other Scots pine woodland (m <sup>2</sup> )	18918.8	n/a	0
r1a-Eutrophic standing water (m <sup>2</sup> )	27342.3	n/a	0
u1a-Open mosaic on previously developed land (m <sup>2</sup> )	24624.34	n/a	0
<b>TOTAL</b>	<b>862572.57</b>		<b>-3562.14</b>

There is no verified or established methodology for calculating carbon sequestration rates of various habitats and the use of flux coefficients is still in the research and development phase. However, the above calculations showing the potential of the Councils’ owned green spaces sequestering (soaking up) an indicative 3,562 tCO<sub>2</sub>e per annum show the huge potential that improving the Councils own land assets could deliver towards the national net zero goal.

# Annual Climate and Environment Action Plan Review 2023.

**Project:** Climate and Environment Action Plan

**Date:** July 2023

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## Version Control

Version		Description of version	Effective Date
0.1	DRAFT		June 2023

## Approvals

Approved by		Date
Matt Holford		27/07/2023
Committee		

## Associated Documentation

Description of Documentation	
Climate and Environment Action Plan 2021-30	
SDDC Annual Carbon Report 2023	

## Executive Summary

This Climate and Environment Action Plan Review examines the Climate and Environment Action Plan 2021-30 using the outcome from the Q4 Head of Service Progress Report (2023) that tracks the progress of each of the 57 individual climate and environment aligned to their service plan and the results of the Councils Annual Carbon Report 2023. Overall, the highlights of this Action Plan Review (2022/23) shows:

- The Council has completed 26 of the 57 actions (46%), a further 20 actions (42%) are in progress and 7 actions (12%) have not started.
- There are some significant successful In-house and District-wide actions that the Council is taking that illustrate the progress that is being made by the Council, these are highlighted in this report.
- The Council's Annual Carbon Report (2023) illustrate that carbon emissions from both In-house and District-wide activities have reduced from the 2018/19 baseline figures.
- The six C&E Transformation Actions that are planned to decarbonise the Councils In-house highest carbon emission sources and locations are detailed. Without the delivery of these Transformation Actions, the Council will not deliver their In-house commitment of becoming carbon neutral by 2030 and so they do require priority awareness and focus.
- This review details the progress made on all the 57 Climate and Environment actions in 2022/23, highlights the successes and makes recommendation for amending the 2023/24 Climate and Environment Plan. These recommendations have the potential to improve the scope of individual actions and create several new actions for 2023/24 that should improve the Councils performance of achieving carbon neutrality.

## Overview of the Climate and Environment Action Plan 2021-30.

The current version of the SDDC Climate and Environment Action Plan 2021-30 (C&E Action Plan) was approved in August 2022. It was agreed that it should be reviewed on an annual basis. The C&E Action Plan details the 57 actions SDDC selected to reduce its In-house carbon emissions to carbon neutral by 2030 and to support the reduction of the district-wide carbon emissions to zero in line with the UK Governments 2050 target. These 57 actions are categorised in the table below.

Types of Climate and Environment Actions.	Number of actions	Number of committed actions*
<b>Transformative Actions</b> High cost, high impact actions to reduce the carbon footprint of the Councils largest emission sources. The completion of these actions will deliver in-house carbon neutrality.	8	2
<b>In-house Service Plan Actions</b> Actions that each Service deliver through the annual service plans to reduce the carbon emissions aligned to and resulting from their service area.	30	13
<b>District Wide Service Plan Actions</b> Actions that each Service will deliver through their annual service plans to reduce the carbon emissions across the district that are aligned to their service area.	19	12
<b>Total Actions</b>	57	27
* Committed actions are those that have financial budgets attached to them		

### 1.1 Action Progress Methodology

This 2022/23 Annual Review is based on the outputs from the processes described below:

1. The Council’s ISO14001 Environmental Management processes and audit feedback
2. The Quarterly Service Action Plan and feedback from Heads of Service on all individual actions
3. The 2023 Annual Carbon Report that gives the current progress on both In-house and District-wide carbon emission reduction.

The outputs from these three processes give a clear indication of:

1. The Council’s governance of the Climate and Environment action delivery
2. External audited verification of the Climate and Environment Action Plan
3. The annual progress of the actions that SDDC has selected to deliver its carbon neutral commitments and progress on the carbon neutral roadmap to 2030.

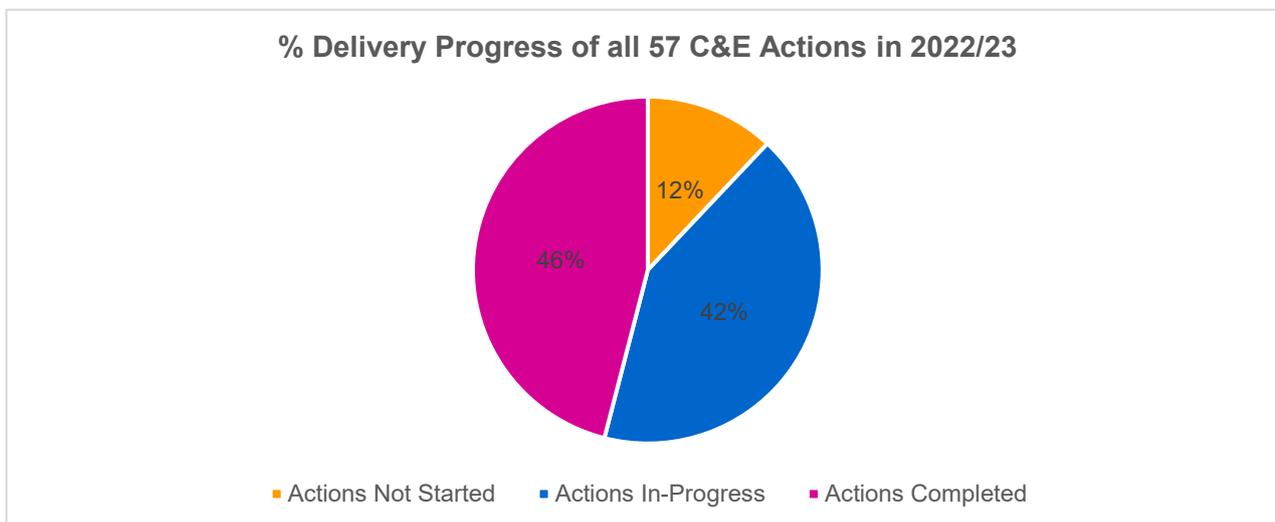
### 1.2 Governance Progress - Outcomes of External Audits.

During the 2022/23 period the Council’s C&E Action Plan was included within the scope of the annual ISO 14001 audit.

Audit 2022/23	Outcomes for 2023/24
ISO14001	<p>ISO14001 certification is the external accreditation of SDDC’s Environmental Management System, which is the way by which the Council manages all of its environmental impacts, including the use/dispose of natural resources and reduction of greenhouse gas emissions.</p> <p>External auditors carried out a three-day surveillance audit in December 2022. The audit did not identify any non-conformities or observations relevant to the Climate and Environment Action Plan. This outcome verifies the governance and project management processes behind the monitoring and delivery of the Climate and Environment Action Plan which will continue without change into 2023/24.</p>

### 1.3 Progress of the individual C&E actions in 2022/23

A major part of the review is to gain feedback from all HoS and track the progress of all the 57 actions by evaluating them in terms of what stage they are at; completed, in-progress or not started. The results of this delivery progress evaluation for 2022/23 is illustrated below:



The above pie chart illustrates that the Council has started or completed 88% of the C&E actions in 2022/23. The 12% of actions that have not been started, include in the main the transformation actions that tackle the largest carbon emission sources and locations.

As part of this Review, each individual action is rag rated (red: not started, orange: in-progress and green: completed) with the progress made and the next steps required for 2023/24, as shown below. For the purposes of this report the actions have been separated into different emissions sectors such as transport, buildings, etc.

#### 1. Transport

Ref	Action	Progress 2022/23	2023/24
T4A	Transition of Operational Vehicle Fleet from diesel to low or zero carbon fuel.	Hydrogen innovation project for refuse trucks & EV charge point installation project for vans etc at the Boardman Depot.	Ongoing action
T4B & 4C	Transition of other Vehicle Fleet to low or zero carbon fuel	Replacement plan to transition under 3.5t vehicles to electric as part of the above.	Ongoing action
SP4	Delivery of the Sustainable Travel Plan and the annual Employee Travel Survey	Complete - Sustainable Travel Plan in place and 2022 Employee Travel Survey completed.	Ongoing action
ISP5	Review fleet procurement to transition to low or zero carbon vehicles	Replacement plan to transition under 3.5t vehicles to electric. Refuse truck replacement plan subject to outcome of Hydrogen pilot.	Ongoing action
ISP7	Appropriate route optimisation software for SDDC fleet vehicles in Housing and Env Health	Housing Service has installed Dynamic Scheduling that will optimise journeys & Env Health only have 2 x vans, so no requirement	Remove
ISP8	Transition to electric grounds maintenance machinery from petrol	All strimmer's & hedge cutters are now electric, and transition of grass mowers has commenced	Ongoing action
DSP5	Public EV charge points infrastructure expansion across the district using OZEV & DCC LEVI funding partnership	Successful OZEV funding rounds across 6 public car parks providing 41 EV charge points in partnership with BP Pulse	Ongoing action
DSP6	Develop a feasibility study to support the transition of South Derbyshire private taxi service to low carbon emission vehicles	Collaboration with Licensing to develop a consultation plan with private hire companies across South Derbyshire.	Ongoing action

DSP7	Review of hydrogen fuel production and infrastructure across South Derbyshire	Innovation project funding sourced for reviewing hydrogen supply, storage & refuelling infrastructure at the Boardman Depot.	Ongoing action
DSP13	Promote sustainable travel to work plans for job creation in growth development areas	Bus route subsidy for Swadlincote /East Midlands business park, Swadlincote to Mercia Park & Uttoxeter to Dove Valley connections established.	Ongoing action

## 2. Buildings and Heating

Ref	Action	Progress 2022/23	2023/24
T1	Decarbonisation of the Civic Offices	Decision to be made on retrofitting energy efficiency measures on existing offices or development of new build	Ongoing action
T2	Decarbonisation of Greenbank Leisure Centre	Decision to be made on installation of future renewable energy source or vision/decision on a new build carbon neutral leisure centre	Ongoing action
T3	Decarbonisation of Etwall Leisure Centre	Partnership Board to decide on renewable energy source future.	Ongoing action
T5	Decarbonisation of Boardman Depot	Future low carbon transport infrastructure plan aligned to fleet vehicle transition/replacement plan.	Ongoing action
T6	Rosliston Environmental Exemplar	Interim short-term decarbonisation action (replacement of biomass boiler) & longer-term vision/decision on Rosliston becoming an Environmental Exemplar.	Ongoing action
T7	SDDC Housing Stock Decarbonisation	Completion of both SHDF 1 & 2 programmes Exploit the opportunity for potential further bid submissions.	Ongoing action
T8	Develop a programme to decarbonise worst performing housing stock	This action should be taken out & replaced with a 2-part action around the feasibility of building carbon neutral social houses and dealing with the climate change impact (e.g. drying clay soil affecting foundations) to certain identified social houses.	Complete, take out & replace with 2 actions.
ISP1	Improving the data content of the Social Housing Stock condition survey data	Procuring an ongoing stock condition survey that focuses on energy efficiency & decarbonisation	Ongoing action
ISP2	Decarbonisation of all public buildings as part of the Corporate Asset Management strategy to future proof all public buildings	Continue this action & establish a funding/budget programme to pay for this.	Ongoing action
ISP6	Creating and developing a Low Carbon Homes Team that supports home decarbonisation across the district	Ongoing delivery of household decarbonisation funding	Ongoing action
ISP13	To create and develop a programme to educate and inform residents/public on using low carbon heating sources	Guidance information developed to support residents & public on low carbon heating	Complete, take out.
ISP9	Install Smart metering at all Council buildings	Awaiting suppliers' collaboration	Ongoing
ISP10	Leisure Centre energy reduction	Act Results to be monitored	Ongoing action
ISP11	Align ongoing Leisure Centre maintenance plan for energy and carbon reduction	Continue to grow this action	Ongoing action
ISP12	F gas replacement/efficiency across Council buildings	Continue this action	Ongoing action
DSP1	SDDC Healthy homes assistance funding programme for private domestic housing energy efficiency and supporting fuel poverty reduction	Continue this action	Ongoing action
DSP2	Energy efficiency regulations – effective enforcement programme across private rented housing.	This action should be taken out for 2023/24	Complete, take out

DSP4	Green Home Grant/LAD funding delivery of retrofit measures to private and tenanted houses.	Ongoing continued funding applications	Ongoing action
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### 3. Planning and Land use

Ref	Action	Progress 2022/23	2023/24
ISP3	Embed carbon neutral in new SDDC Local Plan	Issues and options for Local Plan review drafted for feedback	Ongoing action
DSP3	Develop a database of renewable energy sources across South Derbyshire and track renewable energy production to support planning policy	Data collation completed on existing renewable energy sites across South Derbyshire. DCC have produced a Spatial Renewable Energy Study that will be used in conjunction with this data.	Ongoing action
DSP14	Freeport Plan influencing, promoting, and partnering with local business to deliver green innovation and technology	South Derbyshire District Council has representation on the Freeport development	Ongoing action
DSP18	Embed Active Travel in Swadlincote town centre access plan.	Included in the Levelling Up Funding Bid to install E-bike hub & active travel infographics in the town centre	Ongoing action

### 4. Food and Waste

Ref	Action	Progress	
ISP30	Ongoing waste collection service review to support reduction in waste and increase in recycling and composting delivery rates.	Current review complete, but ongoing government changes to waste collection through 2023/24	Ongoing

### 5. Biodiversity

Ref	Action	Progress 2022/23	2023/24
ISP21	Alteration to grounds maintenance practices to increase biodiversity net gain	Completed – wildflower verges and extended mow schedules have been implemented	Ongoing action
ISP26	Monitoring biodiversity net gain – mapping all green spaces owned by SDDC	Categorisation and mapping completed. Incorporated into GIS.	Ongoing action
ISP28	Create and develop a methodology to estimate the carbon sequestration of council owned green areas across the district	Methodology completed and carbon sequestration estimate as part of the Annual Carbon Report	Ongoing action
DSP8	Utilise Free Tree Schemes across this District.	Completed – free tree schemes are being implemented with public engagement program	Ongoing action
DSP9	Review and detail the climate adaption actions (tree planting and flood resilience) that SDDC are taking across the district	Tree planting and flood adaptations across South Derbyshire is being monitored.	Ongoing action

### 6. Governance and Finance

Ref	Action	Progress 2022/23	2023/24
ISP14	Environmental review of tendering/procurement process	Reviewing program in place, linking with supply chain scope 3 estimations, and adding social value content to procurement and tender evaluations	Ongoing action

ISP15	Investment review to embed decarbonisation	Ongoing review by Finance. Derbyshire County Council have completed a pension review	Ongoing action
ISP16	Review of costings and financing of decarbonisation actions & funding awarded	Updated indicative costings completed for all transformation actions.	Ongoing action
ISP22	Continuous Review of climate change funding and grants	All decarbonisation bids applied for; OZEV, SHDF1&2, LADs, GHG, HUGs, PSDS3b & D2N2	Ongoing action
ISP23	Annual carbon review of SDDC suppliers (Scope 3) and develop a supply chain reduction guidance	Annual Scope 3 (supply chain) estimation complete, based on spend.	Ongoing action
ISP24	Ongoing monitoring and reporting of carbon emissions and delivery of an annual carbon report	Annual carbon report completed and published	Ongoing action
ISP25	Review of all Council policies/strategies to embed carbon neutral	Reviewing of policies and strategies has been completed.	Complete, take out
ISP27	Annual review of SDDC Climate and Environment Action Plan (2021/30)	Annual Climate & Environment Review completed and published	Ongoing action
ISP17	Develop a full equality, diversity, and inclusion impact assessment of SDDC's Climate and Environment Action Plan	Initial EDI impact assessment has been completed. Full EDI impact needs to be assessed with HR.	Ongoing action

## 7. Partnership and Communication

Ref	Action	Progress 2022/23	2023/24
ISP18	Ongoing Environmental/Carbon Literacy training	Online delivery of carbon literacy training for parish councils and residents. Ongoing Climate and Environmental induction for all new employees to the Council	Ongoing action
ISP19	Embed carbon emission reduction into the new Economic Development Plan for SDDC	Decarbonisation, environmental sustainability & biodiversity net gain included in the draft plan	Ongoing action
ISP20	Promotion of the Rosliston Forestry Education Centre as an environmental exemplar	Existing environmental training, workshops, infographics complete. External outdoor corporate training sessions being developed	Ongoing action
ISP29	Develop an annual Climate and Environment Communication Plan	Completed – annual communication plan with focus on social media channels, press releases, internal & external communication updates.	Ongoing action
DSP19	Creating and developing a forum for energy consumption reduction advice for South Derbyshire residents	Completed – specific designated external web page for easy access. Marches Energy Agency commissioned for roadshows & outdoor events across the district	Ongoing action
DSP10	Supporting the promotion of green tourism throughout South Derbyshire	Collaboration has commenced with the National Forest Company to develop a joint programme to support Green Tourism across South Derbyshire	Ongoing action
DSP11	Work in partnership with Derbyshire CC to create a collaborative pathway to carbon zero across Derbyshire	Completed – working with Derbyshire County Council on buildings & transport decarbonisation, fuel poverty & energy reduction, climate change strategy, action plan delivery & engagement.	Ongoing action
DSP12	Partner with Derbyshire CC to engage with UK Government for resource, funding, and relevant powers to deliver Climate and Environment Plans.	Completed - Engaged with Derbyshire CC feedback to government organisations (BEIS, Salix, OZEV) & local government associations to further	Ongoing action

		the cause of decarbonisation, funding & relevant powers	
DSP15	Develop a business engagement programme to support decarbonisation projects.	Completed – process has been developed to promote decarbonisation, renewable energy, energy reduction, suitable green funding and showcasing of green technology operations across South Derbyshire	Ongoing action
DSP16	Create a community engagement programme around Climate Change	Programme of communication, events and engagement of specific community groups has been established for residents and organisations across South Derbyshire.	Ongoing action
DSP17	Support the implementation of the community engagement programme (SD18)	Delivery of the community engagement program is in progress	Ongoing action

From this rag rated table, the actions can be divided into actions completed that should be taken out or kept as ongoing actions for 2023/24 and successful actions that showcase the success of individual service teams in 2022/23.

### Actions completed in 2022/23

From the above table, 26 actions are classed as actions completed in 2022/23 which can be divided into completed actions that should be taken out of the 2023/24 C&E Action Plan or completed action that are ongoing every year and should continue to be included for 2023/24. There are 5 completed actions which can be removed from the next version of the C&EAP.

Action	Completed and to be taken out of 2023/24
ISP7	Appropriate route optimisation software for SDDC fleet vehicles in Housing and Env Health
T8	Develop a programme to decarbonise worst performing housing stock
ISP13	To create and develop a programme to educate and inform residents/public on using low carbon heating sources
DSP2	Energy efficiency regulations – effective enforcement programme across private rented housing.
ISP25	Review of all Council policies/strategies to embed carbon neutral

### Successful Actions in 2022/23

There are a further 18 actions that although not completed have shown real progress and success in 2023/23 either by showcasing the Council's ability to innovate or by delivering significant reduction in carbon emissions, as shown below:

Actions	Success
<b>Transport</b>	
DSP5 – Public EV Infrastructure expansion	SDDC now have installed 42 EV charge points in six car parks across South Derbyshire, displacing 51.7 tCO <sub>2</sub> e per year. Funding has also been sourced to install 3 EV charge points at the Boardman Depot (D2N2 Shared charge points) and potential for additional public EV charge points at a further 6 SDDC owned car parks from the DCC LEVI scheme.

DSP7 – Review of Hydrogen supply & infrastructure for transport.	Innovation project funding sourced for reviewing hydrogen supply, storage & refuelling infrastructure at the Boardman Depot for the Council's refuse waste collection trucks.
<b>Buildings and Heating</b>	
T7 – Social Housing decarbonisation scheme	SHDF Wave 1 & 2 funding has been sourced to retrofit over 200 SDDC social houses to improve their EPC ratings to C or above and reduce tenants' energy bills. This programme, when complete is estimated to reduce carbon emissions by 450 tCO <sub>2</sub> e per year
DSP4 – programme to improve energy efficiency of private and tenanted houses	In 2022/23 44 properties have had measures to increase their energy efficiency & is estimated to reduce carbon emissions by 92.4 tCO <sub>2</sub> e per year.
DSP1 - Healthy homes assistance funding programme for private housing energy efficiency measures and supporting fuel poverty reduction	In 2022/23 SDDC have co-ordinated 56 fuel poverty interventions utilising the Healthy Homes Assistance Fund. A further £314k of funding has been allocated to private sector housing energy improvements under the ECO4 Flex eligibility routes.
<b>Biodiversity</b>	
ISP26 – Mapping of all the SDDC owned green spaces	In 2022/23 SDDC have GIS mapped its 862 ha of green spaces throughout the region that will support its Biodiversity Net Gain programmes and carbon sequestration estimates.
DSP8 – Utilise all tree planting schemes	In 2022/23, SDDC have co-ordinated the planting of 1,777 trees, planted by community groups, residents, and schools. Since 2018/19 over 8,500 trees have been planted, which has the potential to sequester 85 tCO <sub>2</sub> e per year as they mature.
<b>Partnership/Communication</b>	
ISP19 – Engage with local businesses to support carbon emission reduction	In 2022/23 SDDC have engaged with 35 small businesses through South Derbyshire providing decarbonisation expertise. Through the Shared Prosperity Funding they are supporting small business to decarbonise and promote their green economy expertise.
DSP13 – Promoting sustainable travel plans to support job creation	Bus route subsidy for Swadlincote /East Midlands business park, Swadlincote to Mercia Park & Uttoxeter to Dove Valley connections established to support residents, job seekers and sustainable travel.
DSP 19 - Developing a forum for energy consumption reduction advice for South Derbyshire residents	Created a bespoke designated external web page for easy access to continually updates energy consumption reduction advice and tips.
<b>Governance and Finance</b>	
ISP22 – Ongoing identification of carbon reduction funding	Over the last 3 years S DDC has been successful in winning just under £8 million of decarbonisation funding for private sector housing decarbonisation, social housing stock decarbonisation, electric vehicle charge points and innovation funding to support hydrogen low carbon fuels.
<b>Planning and Land Use</b>	
ISP3 - Embedding climate, environment & decarbonisation in the new SDDC Local Plan.	The issues and options consultants included a significant section on climate change and decarbonisation.

## 1.4 Progress from the 2022/23 Annual Carbon Report

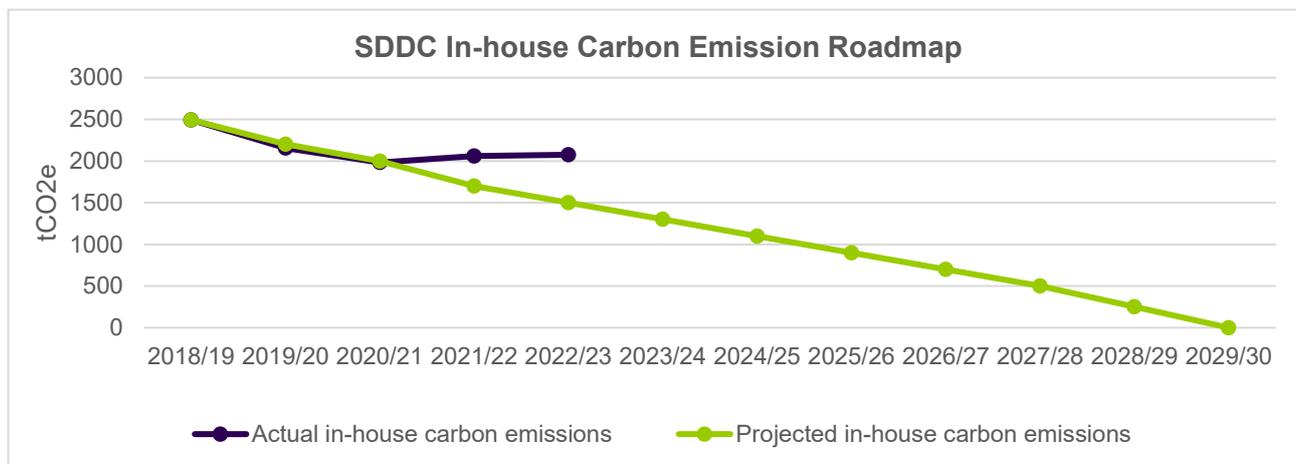
The Annual Carbon Report 2022/23 details the progress the Council has made in reducing its annual In-house and district-wide carbon emissions and the progress being made on its journey to carbon neutrality.

The amount of annual carbon emissions reduction is a significant measure of the success of delivering the C&E Action Plan. It gives an indication of the effectiveness of the individual actions and ultimately whether the Council will deliver its carbon neutral commitments. The table below shows a summary of the Council's progress in 2022/23 in reducing the carbon emissions.

### Carbon emissions reduction achievements in 2022/23

Achievement	Summary
Overall in-house carbon emissions have reduced against baseline year.	Against 2018/19 benchmark, the 2022/23 in-house carbon emissions have reduced by 17%.
The last 2 years have seen in-house carbon emission reduction flat line.	Largely due to the increases in fleet vehicle emissions and increased electricity consumption.
Some individual in-house Scope 1 and 2 emissions are reducing year on year, others have seen increases.	<ul style="list-style-type: none"> <li>Heat (gas) reduced by 4%</li> <li>Electricity increased by 8%</li> <li>Refrigerant remained static</li> <li>Fleet (diesel) increased by 1.2%</li> </ul>
Most categories of in-house Scope 3 emissions are reducing year-on year, whilst the supply chain scope 3 emissions have increased.	Emissions from waste, water, employee commuting and grey fleet are showing reductions from 2018/19 baseline. Supply chain Scope 3 emissions are increasing year on year.
Specific in-house high energy consumption sources are priority areas in delivering in-house carbon neutrality.	Energy consumption of the leisure centres and specific public buildings such as Civic Offices & Rosliston as well as the vehicle fleet are critical to tackle in delivery of carbon neutrality.
District-wide emissions are reducing year-on year	District-wide emissions have reduced by 4% since the 2017/18 benchmark by 4% and by 23% per head of population
The district-wide actions are specifically focused on reducing the high energy sectors (transport, buildings) & improving biodiversity net gain across the region.	Carbon emissions resulting from Transport, Domestic/Residential and Business are making the largest reductions, which is where SDDC are focusing their climate and environment action delivery.

The actual annual In-house carbon emissions can be plotted against the forecasted roadmap to 2030. This plot is shown in the graph below.



The original projection for in-house carbon emissions reductions assumed a linear, steady reduction in carbon emissions from the baseyear of 2018/19 to the target year of 2030.

Emissions reduced between 2018/19 and 2020/21 as the Council made good progress with the delivery of low-cost emissions reductions actions. As these low-cost options have been completed, so the progressive reduction in carbon reductions has flatlined.

The actions which will deliver significant and sustained carbon emissions reductions are the transformation actions (Ref T1 to T8). The graph illustrates that without the completion of the transformation actions, the Council will not meet its carbon neutral commitments.

### 1.5 New actions to be included in the C&E Action Plan for 2022/23

After analysing the overall progress and gaining feedback from Heads of Service on all individual actions there are 10 additional new actions that should be included in the C&E Action Plan for 2022/23 that are required to support ongoing carbon emission reduction progress:

Additional New Actions	Detail
<b>Transport</b>	
EV Infrastructure plan for Housing	EV charging options available for housing team vans
<b>Renewable Energy</b>	
Mine water heating	Feasibility of developing a mine water district heating system in Swadlincote
<b>Buildings and Heating</b>	
Climate Mitigation/Adaption for social housing	Awareness & delivery of mitigation actions required for social housing because of climate - foundations affected by drying clay
Developing new carbon neutral social housing	Feasibility study on developing new build carbon neutral & high efficiency social housing
<b>Governance and Finance</b>	
Full EDI Impact Assessment	Understanding the impact of climate change & associated action on vulnerable communities across South Derbyshire
<b>Partnership/Communication</b>	

Climate/Environment solutions training for Councillors	To develop and create a training programme for Councillors to support awareness & decision making on climate action.
Housing energy efficiency demonstrator	Feasibility of developing the Rosliston bungalow as an energy efficiency demonstrator
<b>Waste</b>	
Improved internal recycling rates	Promotion within public buildings & reduction of single use plastics at Council organised events
Reduce waste & increase recycling & composting	Included in Operations Annual Service Plan
Refurbished laptops for local schools	End of life SDDC laptops to be refurbished for use in local schools.

## 1.6 Recommendations for updating the C&E Action Plans 2023/24

As a result of this annual review of the Climate and Environment Action Plan, the following recommendations are proposed.

	<b>Recommendations</b>
1	Decision around 6 of the 8 Transformation Actions (high carbon emission sources & required high investment) need to be prioritised, as the delivery of these actions is necessary for the Council to reach carbon neutral by 2030.
2	The 5 completed actions should be recorded as 'complete', removed from the C&E Action Plan, but continue to be detailed in an appendix to demonstrate the successful progress SDDC are making.
3	The success of the 12 actions detailed are showcased as demonstrating the Council's commitment and success in taking action to reduce both In-house and District-wide carbon emissions.
5	The 10 new additional actions recommended as part of this review should be incorporated into the revised C&E Action Plan for 2023/24
6	There should be a continued monitoring process and focus of the following public buildings with the highest energy consumptions, both from a carbon and operational cost perspective: <ol style="list-style-type: none"> <li>1. Greenbank Leisure Centre</li> <li>2. Etwall Leisure Centre</li> <li>3. Rosliston Centre</li> <li>4. Civic Offices</li> </ol>
7	Ensure there is an ongoing awareness of the scale of SDDC's Scope 3 Supply Chain carbon emissions and how these can be potentially reduced in a measured way on the journey to 2050.

# Climate and Environment Actions 2023/24

## Including:

1. Ongoing Transformation actions 2021-30
2. Actions successfully completed in 2022/23
3. New actions included for 2023/24
4. Summary of all 2023/24 Actions
5. 2023/24 Actions categorised by Service

**Project:** Climate and Environment Action Plan 2021-30

**Date:** July 2023

## Appendix: Climate and Environment Actions

### 1. Ongoing Transformation Actions in 2021-30

The Transformation Actions tackle the highest in-house emission sources, and their progress is critical to achieving the carbon neutral target for South Derbyshire District Council.

Transformation Action	Decarbonisation Progress
<b>T1 – Civic Hub</b> <ul style="list-style-type: none"> <li>a) Embedding carbon emission reduction measures into the scheduled maintenance and replacement works of the Civic Hub</li> <li>b) Carbon neutrality decision making of the future of the Civic Hub Project.</li> </ul>	<ul style="list-style-type: none"> <li>a) F Gas replacement schedule has reduced emissions year on year. Two PSDs funding applications have been submitted (individual radiator thermostats and replacement LED lighting), both were unsuccessful.</li> <li>b) Hybrid employee working patterns post covid have reduced carbon emissions through reduced electricity consumption. Corporate Property have commissioned a feasibility assessment (technical and investment) from Nottingham City Council into potential renewable energy sources for Civic Offices.</li> </ul>
<b>T2 – Greenbank Leisure Centre</b> <ul style="list-style-type: none"> <li>a) Ongoing scheduled maintenance and replacement works that reduce carbon emissions</li> <li>b) Feasibility study of renewable energy source options for existing Leisure Centre</li> <li>c) Carbon neutrality decision making of the future of Greenbank Leisure Centre</li> </ul>	<ul style="list-style-type: none"> <li>a) More efficient filters have been installed All pumps have had inverters fitted to increase efficiency, saving 30% in operational costs. Active Nation have developed a 25-point energy reduction action plan. Carbon emission reduction is embedded into impending new contract.</li> <li>b) Ongoing discussion</li> <li>c) Ongoing discussion</li> </ul>
<b>T3 – Etwall Leisure Centre</b> <ul style="list-style-type: none"> <li>a) Ongoing scheduled maintenance and replacement works that reduce carbon emissions</li> <li>b) Feasibility study of renewable energy source options for existing Leisure Centre</li> <li>c) Carbon neutrality decision making of the future of Etwall Leisure Centre</li> </ul>	<p>Etwall Leisure Centre is a more modern structure than Greenbank and because of this is more efficient and has a smaller carbon footprint.</p> <p>Etwall is not under the direct control of SDDC and can only use its influence in investment for decarbonisation.</p> <p>Active Nation have developed a 25-point energy reduction plan</p>
<b>T4A – Waste Vehicle Fleet</b> <ul style="list-style-type: none"> <li>a) Installation of low carbon vehicle infrastructure</li> <li>b) Transition to a low carbon vehicle fleet</li> </ul>	<ul style="list-style-type: none"> <li>a) Agreement &amp; funding secured to install 3 EV charge points at the Boardman Depot, as part of the D2N2 Shared Charging Network Scheme</li> <li>b) SDDC, D2N2 and TMUK Hydrogen Dual Fuel RCV proof of concept project in process for 23/24</li> </ul>

<p><b>T4B – Housing Vehicle Fleet</b></p> <ul style="list-style-type: none"> <li>a) Installation of low carbon vehicle infrastructure</li> <li>b) Transition to a low carbon vehicle fleet</li> </ul>	<ul style="list-style-type: none"> <li>a) Feasibility required to develop an EV charging infrastructure plan for the Housing vehicles, since operators are mobile.</li> <li>b) None</li> </ul>
<p><b>T4C – EH Vehicle Fleet</b></p> <ul style="list-style-type: none"> <li>a) Installation of low carbon vehicle infrastructure</li> <li>b) Transition to a low carbon vehicle fleet</li> </ul>	<ul style="list-style-type: none"> <li>a) Feasibility of using EV charge point budget for installation of 2 dual EV charge points at Civic Office car park</li> <li>b) None</li> </ul>
<p><b>T5 – Boardman Depot Infrastructure</b></p> <ul style="list-style-type: none"> <li>a) Decarbonisation of the Depot premises</li> <li>b) Installation of a hydrogen/EV infrastructure</li> <li>c) Embed carbon neutrality into any future potential decision making for relocating the depot</li> </ul>	<ul style="list-style-type: none"> <li>a) None</li> <li>b) Temporary mobile Hydrogen pilot RCV Project to be based at Boardman Depot site limitations. D2N2 EV shared network funding for installation of 3 EV chargers in 2023</li> <li>c) Strategic Property Services aware</li> </ul>
<p><b>T6 – Rosliston Environmental Exemplar</b></p> <ul style="list-style-type: none"> <li>a) Biomass boiler to be repaired or replaced</li> <li>b) Create and deliver a demonstrator renewable energy programme</li> </ul>	<ul style="list-style-type: none"> <li>a) Budget allocated for Biomass boiler</li> <li>b) Renewable energy sources have been discussed, awaiting further development of Rosliston Forestry Centre vision.</li> </ul>
<p><b>T7 – Develop a programme to decarbonise housing stock</b></p> <p>Continued development of a decarbonisation programme for the complete housing stock</p>	<p>SHDF Wave 1 bid application successful to support a £1.2 million fund to retrofit the worst and most needy 90 households within the SDDC housing stock. The programme has started for SHDF Wave 2 with an additional 110 houses to be retrofitted.</p>
<p><b>T8 – Develop a programme to deliver climate resilience and carbon neutral social housing</b></p> <p>Feasibility study and development programme to deliver carbon neutral housing stock.</p>	<ul style="list-style-type: none"> <li>a) Feasibility study completed on the design of carbon neutral &amp; low energy consumption social housing stock.</li> <li>b) Study on existing housing stock to identify required climate adaption/resilience measures (subsidence, instability due to drying or flooding of foundations).</li> </ul>

## 2. Actions successfully completed in 2022/23

5 actions have been completed in 2022/23 & the success of these is shown below:

Action	Completed and to be taken out of 2023/24
ISP7	Appropriate route optimisation software for SDDC fleet vehicles in Housing and Env Health
T8	Develop a programme to decarbonise worst performing housing stock
ISP13	To create and develop a programme to educate and inform residents/public on using low carbon heating sources
DSP2	Energy efficiency regulations – effective enforcement programme across private rented housing.
ISP25	Review of all Council policies/strategies to embed carbon neutral

## 3. New Actions to be added into 2023/24 Action Plan

8 new actions are to be included in the 2023/24 action plans as shown below:

New Action	New action added for 2023/24
T8	i/ Feasibility study on developing new build carbon neutral & high efficiency social housing ii/ Awareness & delivery of mitigation actions required for social housing because of climate - foundations affected by drying clay
ISP7	EV charging options available for housing team vans
DSP2	Feasibility of developing a mine water district heating system in Swadlincote
ISP13	To develop and create a training programme for Councillors to support awareness & decision making on climate action.
ISP25	Feasibility of developing the Rosliston bungalow as an energy efficiency demonstrator
ISP31	Promotion of recycling within public buildings & reduction of single use plastics at Council organised events
ISP30	Reduce waste & increase recycling & composting
ISP32	End of life SDDC laptops to be refurbished for use in local schools.

## 4. Summary of Actions for 2023/24.

### Transformation Actions - The 8 high emission source actions

Committed Actions – costs are budgeted for		Uncommitted Actions – no current budget				New actions for 2023/24			
Action Ref.	Decarbonisation Actions.	Total Indicative £Cost of Action	DE carbon £cost of Action	Hours	Current tCO <sub>2</sub> e	tCO <sub>2</sub> e Reduction	Start	Finish	Co-benefit
T1	<b>Carbon Neutral Civic Hub Options</b> 1. Retrofit of existing Civic Way. 2. Energy efficient new build.	1. £3 m 2. £8 m	1. £1.2m 2. £2.4m	0	208	208	2024	2030	Reduced energy consumption and operating costs
T2	<b>Carbon Neutral Greenbank Leisure Centre</b> · Energy efficient retrofit measures · Renewable energy source.	£750k	£750k	0	589	589	2024	2030	Reduced energy consumption and operating costs
T3	<b>Carbon Neutral Etwall Leisure Centre</b> · Energy efficient retrofit. · Renewable energy source.	£280k	£280k	0	228	228	2024	2030	Reduced energy consumption and operating costs
T4A	<b>A. Transition to Low Carbon Waste Fleet</b> o EV replacement of small vans. (38) o EV/Hydrogen replacement of trucks (13)	£1.3m £5.2m	£325k £2.6m						Reduce fuel costs
T4B	<b>B. Low Carbon Housing Fleet</b> o EV replacement of small vans. (13)	£422k	£110.5k	0	722	722	2021	2030	
T4C	<b>C. Other Fleet.</b> o <b>Other small vans.</b> (6)	£204k	£51k						
T5	<b>Carbon Neutral Boardman Depot</b> o Renewable energy source - heating o Installation of Hydrogen/EV infrastructure o Potential Depot relocation	£200k £120k £1m plus?	£200k £120k £1m plus	0	75	75	2021	2030	Reduce energy consumption Reduce fuel
T6	<b>Rosliston Environmental Exemplar</b> o Biomass repair or replace o On-site renewable energy source	£117k tbc	0 Tbc	0 0	102 36	102 36	2024 2024	2030 2030	Reduce energy Reduce energy cost
T7*	<b>SDDC Housing Stock Decarbonisation</b> Continued programme to decarbonise SDDC housing stock	tbc	tbc	0	8,000*	tbc	2021	2050	Reduce energy consumption and cost
T8*	Develop a programme to deliver climate resilience and carbon neutral social housing	tbc	tbc	0	1,200*	tbc	2024	2050	Reduce energy consumption and cost
<b>Totals</b>		<b>£10 – £15m</b>	<b>£6-£7m</b>	<b>0</b>	<b>2,500</b>	<b>2,020</b>	<b>2021</b>	<b>2050</b>	

\*T7 and T8 CO<sub>2</sub>e emissions are classed as District-wide emissions and as such are not included in the 2018/19 In-house emissions baseline (2,500 tCO<sub>2</sub>e).

**In-house Service Plan Action Summary 2023/24** -The 33 In-house Actions aligned to individual Council Services as part of their 2023/24 Service Plans.

Action Ref.	Decarbonisation Action	Total indicative £cost of Action	DE carbon £cost of Action	Hours	Current tCO <sub>2</sub> e	tCO <sub>2</sub> e Reduction	Start	Finish	Co-Benefit
	<b>Buildings and Heat decarbonisation</b>								
ISP1	Improving the data content of the Social Housing Stock condition survey data	0	0	300	tbc	tbc	2023	2024	Fuel saving
ISP2	Maintenance programme for all public building estate linked to decarbonisation	£300k	£150k	0	152	tbc	2021	2024	Energy reduction
ISP3	Embed carbon neutral in new SDDC Local Plan	0	0	300	tbc	tbc	2021	2024	Energy reduction
ISP6	Creating and developing a Low Carbon Homes Team that supports home decarbonisation across the District	£100k	£100k	3,000	tbc	tbc	2022	2024	Energy reduction
ISP25	Feasibility of developing the Rosliston bungalow as an energy efficiency demonstrator	tbc	tbc	500	tbc	tbc	2023	2024	Energy reduction
	<b>Transport and Fleet decarbonisation</b>								
ISP4	Ongoing delivery of the Sustainable Travel Plan and the annual Sustainable Travel Questionnaire	£40k	0	300 pa	26	2	2021	2024	Energy reduction
ISP5	Review fleet Procurement to transition to low/zero carbon vehicles	0	0	300	722	0	2021	2024	Fuel reduction
ISP7	EV charging options available for housing team vans	tbc	tbc	Tbc	tbc	tbc	2023	2024	Fuel saving
	<b>Energy decarbonisation</b>								
ISP8	Transition to electric grounds maintenance machinery	£250k	£125k	0	tbc	10	2021	2024	Fuel saving
ISP9	Install Smart metering at all Council buildings	£5k	£5k	0	477	48	2021	2025	Electricity saving
ISP10	Leisure Centre electricity reduction and review	0	0	50	216	22	2021	2024	Electricity saving
ISP11	Ongoing Leisure Centre maintenance plan for emission reduction	tbc	0	50	1202	120	2021	2024	Energy saving
SPI12	F gas replacement/efficiency across Council buildings*	tbc	tbc	0	485	242	2021	2030	Reduce pollution
	<b>Finance decarbonisation</b>								
ISP14	Carbon review of procurement process	0	0	30	tbc	tbc	2021	2024	Social Value
ISP15	Investment review to embed decarbonisation	0	0	50	0	0	2021	2024	Higher returns
ISP16	Review of costings and financing of Transformative Actions	0	0	500	0	0	2021	2024	None
	<b>Community Engagement</b>								
ISP13	Create a climate & environment training/awareness programme for Councillors	0	0	500	0	0	2023	2024	Social value
ISP18	Ongoing Environmental/Carbon Literacy training	0	0	400 pa	0	0	2021	2024	Social value
ISP19	Embed carbon emission reduction into the new Economic Development Plan for SDDC	0	0	300 pa	0	0	2022	2024	Social value
ISP20	Rosliston Exemplar Sustainable Hub Plan	0	0	500	136	0	2021	2024	Revenue channel
	<b>Biodiversity and Environment</b>								
ISP21	Alteration to grounds maintenance practices	0	0	50	tbc	tbc	2021	2024	Fuel/time reduction
ISP26	Monitoring biodiversity net gain – mapping all green spaces owned by SDDC	0	0	300 pa	tbc	tbc	2022	2024	Carbon offsetting

ISP28	Ongoing development of a methodology to estimate the carbon sequestration of council owned green areas across the district	0	0	300 pa	tbc	tbc	2022	2024	Carbon offsetting
	<b>Performance and Governance</b>								
ISP22	Continuous Review of climate change funding and grants	£1k	0	100 pa	0	0	2021	2024	Cost benefit
ISP23	Annual carbon review of SDDC suppliers (Scope 3) and develop a supply chain reduction guidance	0	0	200 pa	tbc	tbc	2021	2024	None
ISP24	Ongoing monitoring and reporting of carbon emissions and delivery of an annual carbon report	0	0	500 pa	2,500	125	2021	2024	Reduce energy
ISP27	Annual review of SDDC Climate and Environment Action Plan (2021/30)	0	0	50pa	2,500	0	2022	2030	None
ISP17	Develop a full equality, diversity and inclusion impact assessment of SDDC's Climate and Environment Action Plan	0	0	100 pa	0	0	2022	2024	Social value
	<b>Waste</b>								
ISP30	Ongoing waste collection service review to support reduction in waste and increase in recycling and composted	0	0	100 pa	tbc	0	2022	2024	Waste reduction
ISP31	Promotion of recycling within public buildings & reduction of single use plastics at Council organised events	0	0	100	tbc	0	2023	2024	Waste reduction
ISP32	End of life SDDC laptops to be refurbished for use in local schools.	0	0	100	tbc	0	2023	2024	Waste reduction
	<b>Communications</b>								
ISP29	Develop an annual Climate and Environment Communication Plan	0	0	200	2,500	0	2021	2024	None

\*This estimate does not include the F gas replacement, for which an accurate figure is not yet available.

### **District-wide Service Plan Action Summary 2023/24** – The 19 District-wide actions aligned to individual Council Services as part of their Service Plans for 2023/24.

Action Ref.	Decarbonisation Actions	Total Indicative £costs of Action	DE carbon £cost of Action	Hours	Current tCO2e	tCO2e Reduction	Start	Finish	Co-benefit
	<b>Energy decarbonisation</b>								
DSP1	SDDC Healthy homes assistance funding programme for private domestic housing energy efficiency and supporting fuel poverty reduction	£200k	0	2000	Tbc	Heating decarbonisation	2021	2024	Reduce energy
DSP2	Feasibility of developing a mine water district heating system in Swadlincote	£100k	tbc	500	tbc	Heating decarbonisation	2023	2024	Eliminate energy costs
DSP3	Identify opportunities to support the development of renewable energy sources and track large scale renewable developments across South Derbyshire	0	0	100 pa	Tbc	Renewable energy source	2022	2024	Eliminate energy costs
DSP4	Green Home Grant/LAD funding delivery of retrofit measures to private and tenanted houses.	£2.5m	0	1,500	Tbc	Renewable energy sources	2021	2024	Eliminate energy costs
DSP19	Creating and developing a forum for energy consumption reduction advice for South Derbyshire residents	0	0	200pa	tbc	Heating decarbonisation	2022	2024	Reducing energy costs
	<b>Transport decarbonisation</b>								
DSP5	EV funding and infrastructure programme for South Derbyshire	£200k	0	200	Tbc	Transport decarbonisation	2021	2024	Reducing motoring costs

DSP6	Develop a feasibility study to support the transition of South Derbyshire private taxi service to low carbon emission vehicles	0	0	200 pa	Tbc	Transport decarbonisation	2022	2024	Reduce fuel costs
DSP7	Review of hydrogen fuel production and infrastructure across South Derbyshire	0	0	500	Tbc	Renewable energy source	2022	2024	Share hydrogen refuelling costs
	<b>Biodiversity and Environment</b>								
DSP8	Utilise Free Tree Schemes	0	0	100 pa	Tbc	Carbon sequestration	2021	2024	Tree canopy, flood resilience
DSP10	Supporting the promotion of green tourism throughout South Derbyshire	0	0	100	Tbc	Carbon sequestration	2022	2050	Increase tourism economy
	<b>Climate Adaption</b>								
DSP9	Review and detail the climate adaption actions (tree planting and flood resilience) that SDDC are taking across the District	0	0	300 pa	Tbc	Adaption	2022	2024	Future proofing
	<b>Green Economic Growth</b>								
DSP11	Work in partnership with Derbyshire CC to create a collaborative pathway to carbon zero across Derbyshire	£10k	£0	500 pa	Tbc	Reduce all emission sources	2022	2024	Share costs
DSP12	Partner with Derbyshire CC to engage with UK Government for resource, funding, and relevant powers to deliver Climate and Environment Plans.	0	0	100 pa	Tbc	n/a	2022	2024	Collaboration of resource
DSP13	Create and promote a Sustainable Travel to work Plan for job creation	0	0	100	Tbc	Transport decarbonisation	2021	2025	Improve economy
DSP14	Freeport Plan influencing, promoting, and partnering with local business to deliver green innovation and technology	0	0	200	Tbc	Transport decarbonisation	2020	2025	Improve economy
	<b>Community Engagement</b>								
DSP15	Develop a business engagement programme to support decarbonisation projects.	0	0	200 pa	Tbc	n/a	2021	2030	Improve economy
DSP16	Create a community engagement programme around Climate Change	£20k	£20k	500	Tbc	Carbon footprint reduction	2021	2030	Community pride
DSP17	Support the implementation of the community engagement programme (SD18)	tbc	tbc	tbc	Tbc	Carbon footprint reduction	2021	2030	Community pride
DSP18	Embed Active Travel in Swadlincote town centre access plan.	0	0	tbc	Tbc	Transport decarbonisation	2021	2025	Active travel

## 4.Climate and Environment Service Plan Actions (2023/24)

### Transformation Actions 2023/24 - IT and Business Change

	<b>Action Ref: T1</b>	<b>Embed decarbonisation in Civic Hub Project</b>	
Timeframe	<b>2021 - 2023</b>	<b>2024 - 2027</b>	<b>2028 - 2030</b>
Action	Continued evolving review of the two decarbonisation options - New build or Retrofit of existing Civic Office.	Decision made on option and planning completed	Implement decision. New build or existing retrofit established with carbon neutral footprint.
Reduction	8-10% reduction in total emissions.	0	208 tCO2e (carbon neutral)
Indicative Total Cost	200 hours	200 hours	Retrofit £2m - £3m. New build £6m - £8m
Decarbonisation Costs	0	0	Retrofit: £1.2m – £1.8m (60% of total cost) New build: £2.4m - £3.2m (40% of total cost).

	<b>Action Ref: T2</b>	<b>Greenbank Leisure Centre decarbonisation</b>
Timeframe	<b>2021 -2023</b>	<b>2024 - 2030</b>
Action	<ol style="list-style-type: none"> <li>Current ongoing interim actions to reduce emissions.</li> <li>Feasibility study of renewable energy source options.</li> <li>Decision made on emission reduction plan.</li> </ol>	Transition from natural gas to renewable source for heating and electricity consumption.
Reduction	Interim actions = 8-10% emission reduction	Heating renewable source= 439 tCO2e (100% reduction) F Gas reduction = 148 tCO2e (64.5% reduction) Heating and electricity renewable source = 589 tCO2e (100% reduction)
Indicative Total Cost	500 hours	£750k
Decarbonisation Costs	0	£750k

	<b>Action Ref: T3</b>	<b>Etwall Leisure Centre decarbonisation</b>
Timeframe	<b>2021 -2023</b>	<b>2024 - 2030</b>
Action	<ol style="list-style-type: none"> <li>Current Interim actions on reducing emissions.</li> <li>Feasibility study of renewable energy source options.</li> <li>Decision made on emission reduction plan.</li> </ol>	Transition from natural gas to renewable source for heating.  Or transition to renewable source for heating and electricity.
Reduction	Current emissions = 383 tCO2e Reduction of Interim actions = 31 tCO2e (8 -10%)	Current heating and electricity emissions = 228 tCO2e F Gas reduction = 155 tCO2e
Indicative Total Cost	500 hours	£280k plus
Decarbonisation Costs	0	£280k plus
Note	1. John Port School own Etwall Leisure Centre, so partnership approach.	

	<b>Action Ref: T4A</b>	<b>Decarbonisation of Waste Vehicle Fleet.</b>	
Timeframe	<b>2021 - 2023</b>	<b>2024 - 2027</b>	<b>2028 - 2030</b>

Action	Phased transition replacement of depot light vehicles (cars, vans, etc).	Hydrogen Fuel mix conversion for refuse trucks = £45k/truck	Full electrification or 100% Hydrogen for refuse trucks + electrification of depot vehicles.
Reduction	100% reduction of depot vehicle emissions only.	40% reduction of current refuse truck emissions only.	100% reduction of fleet emissions (588 tCO2e)
Total Indicative Cost	38 EV vans = £1.22m EV charging points = £80k  Total cost = £1.3m	13 x truck conversion = £585k Hydrogen filling station = £120k?  Total cost = £705k	13 x EV/Hydrogen trucks = £5.2m EV charge point = £50k  Total cost = £5.2m
Decarbonisation Cost	£325k	£705k	£2.7m
Note	EV infrastructure required.	Depot Hydrogen refilling station	Full EV or Hydrogen infrastructure.

Action Ref:	<b>T4B - Decarbonisation of Housing vehicle fleet.</b>
Emission Source	Carbon emissions from Housing fleet fuel = 134 tCO2e
Owned by	Head of Housing
Dates	Start: 2021 Finish: 2030
Emission Impact	Complete electrification or hydrogen fuelled housing vehicle fleet = carbon neutral
Notes	EV infrastructure needed for home charging. Or change in work behaviour and EV's 'return to grid' infrastructure' requiring overnight parking. Partner with DCC on 'on-street parking'.
Indicative Total Costs	13 x small EV vans = £422k + 10 x Charge points = £22k Total costs = £444k
Decarbonisation Costs	EV vans = £110.5 + charge points = £22k Decarbonisation costs = £132.5k

Action Ref:	<b>T4C – Decarbonisation of EH vehicle fleet.</b>
Emission Source	Carbon emissions from other fleet (Environmental Health)
Owned by	Head of Environmental Health
Dates	Start: 2021 Finish: 2030
Emission Impact	Complete electrification or hydrogen fuelled small fleet by 2030.
Notes	Electric infrastructures need for Civic Way Offices and Rosliston – awaiting decision on One public estate 2021/22
Indicative Total Costs	6 x EV vans = £204k + 2 x Charge point = £5k Total costs = £209k
Decarbonisation Costs	EV vans = £51k + charge points = £5k Decarbonisation costs = £56k

	<b>Action Ref: T5</b>	<b>Boardman Depot</b>
Timeframe	<b>2021 -2023</b>	<b>2024 - 2030</b>
Action	Current Interim actions on reducing emissions.  Feasibility study of renewable energy source options.  Decision made on emission reduction plan.  Feasibility study of Hydrogen/Electric fuelling station &/or Depot relocation.	Transition from natural gas to renewable source for heating and electricity.  Installation of low carbon fuelling infrastructure (Hydrogen &/or EV)  Potential Depot relocation.
Reduction	Interim actions = 8-10% emission reduction	Heating and electricity renewable source = 42 tCO2e (100% reduction)  Installation of low carbon fuelling infrastructure  Depot relocation – carbon neutral
Total Indicative Costs	500 hours	£200k renewable energy source £120k plus for Hydrogen/EV fuelling station. £? Relocate depot

Decarbonisation Costs	0	100% of total costs and dependant on option
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	<b>Action Ref: T6</b>	<b>Rosliston (Visitor Centre and Enterprise building)</b>
Timeframe	<b>2021 -2023</b>	<b>2024 - 2030</b>
Action	Current Interim actions on reducing emissions.  Feasibility study of renewable energy source options.  Decision made on emission reduction plan.	Biomass repair  Renewable energy infrastructure for complete Rosliston site (holiday homes, visitor centre, etc)  Creation of Rosliston Exemplar
Reduction	Interim actions = 8-10% emission reduction	Heating and electricity renewable source = 136 tCO2e (100% reduction)
Total indicative Costs	200 hours	Repair of Biomass boiler = £117k Renewable energy source (solar pv or heat source pumps) = £100k

Action Details	<b>T7 – Continued programme to decarbonise the SDDC housing stock through Government Funding and the Housing Revenue Account.</b>
Emissions Source	Council owned housing stock
Owned by	Head of Housing
Dates	Start: 2021 Finish: 2050
Emission Impact	TBD
Cost	£43m (based on £15k each for 3,000 properties)

Action Details	<b>T8 – Develop a programme to deliver a climate resilience adaption to affected existing social housing and develop new carbon neutral social housing stock.</b>
Emissions Source	Existing housing stock
Owned by	Head of Housing
Dates	Start: 2023 Finish: 2050
Emission Impact	TBD
Cost	tbc

## All Service Plan Actions 2023/24

These two actions are common to all Service areas.

Action Details	ISP4 – Ongoing annual delivery of Sustainable Travel Plan and annual travel questionnaire
Emissions Source	Employee vehicle commuting fuel emissions at all SDDC locations = 26 tCO2e
Owned by	All Heads of Service
Dates	Start: 2021 Finish: 2024
Emission Impact	Targeted reduction of H1 carbon emissions = 7% (1.8 tCO2e)
Cost	£40,000 & 300 hours

Action Details	ISP24 – Ongoing quarterly monitoring of Climate & Environment Action Plan and preparation of annual reporting of all carbon emission sources from Council in-house controlled activities
Emissions Source	All carbon emission sources: Heat, Refrigerant, Vehicle fuel and Electricity = 2,500 tCO2e
Owned by	All Heads of Service
Dates	Start: April 2021 Finish: Ongoing
Emissions Impact	Estimated reduction of all carbon emissions = 5% (125 tCO2e)
Cost	300 hours

## Corporate Property - Service Plan Actions 2023/24

### In-house actions

Action Details	ISP2 – Embed decarbonisation of public buildings in the planned maintenance strategy
Emissions source	Heat and electricity emissions from all Public and SDDC owned Commercial buildings.
Owned by	Head of Corporate Property
Dates	Start: April 2021 Finish: April 2030
Emission Impact	Reduction of Public Buildings emissions (152 tCO <sub>2</sub> e) to achieve carbon neutral
Cost	£300k – additional costs in addition to the ongoing maintenance programme.

Action Details	ISP9 – Ongoing commissioning of SMART metering across all public buildings (excluding social housing)
Emissions Source	Electricity emissions from all Council buildings
Owned by	Head of Corporate Property
Dates	Start: April 2021 Finish: April 2025
Emission Impact	Up to 10% reductions in energy use through accurate emission reporting, increased awareness, and accountability for carbon emissions from Council energy activities
Cost	£5K

Action Details	ISP11 – Align ongoing maintenance plan to reducing current carbon emissions at Leisure Centres from the Lifecycle Analysis (existing plant, retrofit measures and investment requirements to reduce emissions).
Emissions Source	Energy/heat/electricity at Greenbank and Etwell Leisure Centres = £1202 tCO <sub>2</sub> e
Owned by	Head of Cultural and Community Services
Dates	Start: April 2021 Finish: April 2024
Emissions Impact	Reduction of current energy emissions of 120 tCO <sub>2</sub> e (10%)
Cost	50 hours, Maintenance, retrofit, and investment requirements need to be costed as part of the plan.

Action Details	ISP12 – F Gas ongoing maintenance, update, and replacement programme.
Emissions Source	Refrigerant emissions at Leisure Centres, Civic Way and Boardman Road depot.
Owned by	Head of Corporate Property
Dates	Start: 2021 Finish: 2030
Emission Impact	242 tCO <sub>2</sub> e based on a 50% reduction in total F gas emissions
Cost	To Be Confirmed

### District-wide actions

Action Details	DSP18 – Feasibility plan to embed Active Travel (walk/cycle pathways, EV infrastructure and public transport connectivity) into Swadlincote town centre access plans.
Emissions Source	Transport
Owned by	Head of Corporate Property/Head of Environmental Services
Dates	Start: 2022 Finish: 2024
Emission Impact	Transport reduction and increasing walking and cycling.
Cost	£40k & 100 hours

## Cultural and Community Services - Service Plan Actions 2023/24

### In-house actions

Action Details	ISP10 – Manage ongoing energy reduction actions plans for the Leisure Centres through operational contractors.
Emissions Source	Heat and electricity at Greenbank and Etwall Leisure Centres = 1,202 tCO <sub>2</sub> e
Owned by	Head of Cultural and Community Services
Dates	Start: June 2021 Finish: April 2024
Emissions Impact	Behavioural change heat and electricity emissions reductions of 120 tCO <sub>2</sub> e (10%)
Cost	50 hours

Action Details	ISP20 – Rosliston Exemplar - promote Rosliston Forestry Centre as a pioneer of environmental sustainability education which includes renewable energy sources, low carbon emission technology, carbon sequestration, biodiversity and natural capital improvement.
Emissions Source	Heat and electricity sources plus tree and plant carbon sequestration.
Owned by	Head of Cultural and Community Services
Dates	Start: April 2021 Finish: April 2024
Emission Impact	To make Rosliston nett carbon positive
Cost	500 hours

Action Details	ISP21 – Ongoing planning and delivery of alteration to grounds maintenance practices to maximise biodiversity
Emissions Source	Carbon sequestration from all sectors across South Derbyshire
Owned by	Head of Cultural and Community Services/ Head of Operational Services
Dates	Start: April 2021 Finish: April 2024
Emission Impact	Improves biodiversity, which increase soil ability to sequester carbon.
Cost	50 hours

Action Details	ISP26 – Monitoring Biodiversity net gain – mapping all green spaces owned by SDDC
Emissions Source	Carbon sequestration
Owned by	Head of Culture and Community Services
Dates	Start: 2022 Finish: 2024
Emission Impact	Carbon sequestration
Cost	500 hours

### District-wide Actions

Action Details	DSP8 – Utilise all Free Tree planting schemes across the District and monitor tree planting increases.
Emissions Source	Carbon sequestration from all sectors across South Derbyshire
Owned by	Head of Cultural and Community Services
Dates	Start: 2021 Finish: 2024
Emissions Impact	Estimated 6.2 tCO <sub>2</sub> e per year per hectare sequestered
Cost	100 hours

## Economic Development and Growth Services - Service Plan Action 2023/24

### In-house actions

Action Details	ISP19 Embed carbon emission reduction into the new Economic Development Plan
Emissions Source	All In-house and District-wide emissions
Owned by	Head of Economic Development & Growth/Head of Env Health
Dates	Start: April 2022 Finish: April 2025
Emissions Impact	Engage public and private sector expertise to help deliver SDDC emissions reductions
Cost	300 hours

### District-wide actions

Action Details	DSP10 – Support the promotion of Green Tourism throughout South Derbyshire and specifically National Forest as an exemplar sustainable environment
Emissions Source	None
Owned by	Head of Economic Development
Dates	Start: 2021 Finish: 2024
Emission Impact	Increasing carbon offsetting across South Derbyshire.
Cost	100 hours

Action Details	DSP13 – Promote sustainable travel to work plans (public transport) for job creation/growth development areas across South Derbyshire.
Emissions Source	Vehicle
Owned by	Head of Economic Development and Head of Strategic Planning
Dates	Start: 2021 Finish: 2025
Emission Impact	Reduce vehicle mileage and promote public transport
Cost	100 hours

Action Details	DSP14 – Influencing, promoting, and partnering with local business to embed green innovation and technology at the East Midlands Inter-Modal Park 'Freeport'.
Emissions Source	Road and Rail transport
Owned by	Head of Economic Development/Head of Planning and Strategic Housing Services
Dates	Start: 2021 Finish: 2025
Emission Impact	Creation of green technology hubs to reduce emissions
Cost	TBD

Action Details	DSP15 – Support local businesses across South Derbyshire in their development of energy efficiency and decarbonisation projects and the identification of suitable green funding.
Emissions Source	All carbon sources
Owned by	Head of Economic Development /Head of Environmental Health
Dates	Start: 2021 Finish: Ongoing
Emission Impact	All sources across South Derbyshire
Cost	100 hours

## Environmental Health Services - Service Plan Actions 2023/24

### In-house Actions.

Action Details	ISP6 – Ongoing development of a Low Carbon Homes Team that supports household decarbonisation across the whole of South Derbyshire
Emissions Source	Household heating
Owned by	Head of Environmental Health Services/Housing Services
Dates	Start: 2022 Finish: 2024
Emission Impact	Reduction household heat emissions
Cost	4000 hours

Action Details	ISP13 – Develop and create a climate and environmental training programme for Councillors to support the awareness and decision making on climate action.
Emissions source	All
Owned by	Head of Environmental Services
Dates	Start: 2023 Finish: Ongoing
Emissions Impact	Higher awareness for all Councillors for reducing personal and corporate carbon impact and carbon footprint
Cost	400 hours

Action Details	ISP14 – Quarterly monitoring of the SDDC tender/procurement process to establish carbon neutral supplier questions and carbon neutral scoring/awarding criteria
Emissions Source	All
Owned by	Head of Environmental Services
Dates	Start: April 2022 Finish: April 2024
Emissions Impact	Increase the importance of carbon accounting and reduce carbon emissions through future procurement decisions and supplier selection.
Cost	30 hours

Action Details	ISP18 – Ongoing environmental training (Climate and Biodiversity) for SDDC employees.
Emissions source	All
Owned by	Head of Environmental Services
Dates	Start: April 2021 Finish: Ongoing
Emissions Impact	Higher awareness for all staff of the importance of reducing personal and corporate carbon impact and carbon footprint
Cost	400 hours

Action Details	ISP22 – Continuous identification of funding and grants, identifying carbon reduction opportunities for the Council and Partners.
Emissions source	All
Owned by	Head of Environmental Services
Dates	Start: April 2021 Finish: Ongoing
Emissions Impact	Funding decarbonisation actions
Cost	£1,000 and 100 hours

Action Details	ISP23 – Annual review of SDDC 'Scope 3' Supply Chain emissions, quantify their carbon impact and develop an appropriate draft supply chain guidance for approval.
Emissions Source	All sources.
Owned by	Head of Environmental Services
Dates	Start: April 2022 Finish: April 2024
Emissions Impact	Identify emission reduction opportunities with contractors and suppliers

Cost	200 hours
Action Details	ISP25 – Feasibility study on developing the Rosliston bungalow into aa energy efficiency demonstrator
Emissions source	All
Owned by	Head of Environmental Services
Dates	Start: 2023 Finish: 2024
Emissions Impact	Heating emission sources
Cost	500 hours

Action Details	ISP27 - Annual review of SDDC Climate and Environment Action Plan (2021/30) to update and verify in line with ISO accreditation and other audits.
Emissions source	All
Owned by	Head of Environmental Health and all Heads of service
Dates	Start: July 2022 Finish: ongoing on an annual basis.
Emissions Impact	Ongoing support of reduction of all emissions from in-house and district-wide emissions
Cost	50 hours

Action Details	ISP28 – Continued development of a methodology to estimate the carbon sequestration of council owned green areas across South Derbyshire
Emissions Source	Carbon sequestration
Owned by	Head of Environmental Health Services/ Cultural and Community Services
Dates	Start: 2022 Finish: 2024
Emission Impact	Sequestration & offsetting
Cost	300 hours

Action Details	ISP31 – Promotion of recycling within public buildings & reduction of single use plastics at Council organised events
Emissions Source	Waste collection
Owned by	Head of Environmental Services
Dates	Start: April 2023 Finish: April 2024
Emission Impact	Reduction in waste emissions
Cost	100 hours

Action Details	ISP32 – Create a programme to refurbish end of life Council laptops to be used in local schools
Emissions Source	Waste collection
Owned by	Head of Environmental Services
Dates	Start: 2023 Finish: 2025
Emission Impact	Reduction in waste emissions
Cost	100 hours

## District-wide Actions

Action Details	DSP1 – SDDC Healthy Homes Assistance Fund for private and tenant housing energy efficiency and supporting fuel poverty reduction.
Emissions Source	Domestic heating for private and tenanted houses
Owned by	Head of Environmental Services
Dates	Start: March 2021 Finish: March 2023
Emissions Impact	TBD
Cost	£200k

Action Details	DSP2 – Feasibility of developing Mine Water Heating network in Swadlincote
Emissions Source	Heat & Energy
Owned by	Head of Environmental Services

Dates	Start: 2023 Finish: Ongoing
Emissions Impact	TBD
Cost	300 hours officer time

Action Details	DSP3 – Ongoing development of a database of existing and approved renewable energy sources across South Derbyshire which can be used in future policy considerations to support decision making around sustainable renewable energy developments within the planning policy. Track the overall renewable energy production capacity of South Derbyshire & identify opportunities to support local businesses to develop their own renewable energy sources.
Emissions Source	Energy Sources
Owned by	Head of Environmental Health Services/Head of Planning and Strategic Housing
Dates	Start: 2022 Finish: 2024
Emission Impact	Reduction of carbon emission through renewable energy sources
Cost	200 hours

Action Details	DSP4 – Green Homes Grant/LAD funding delivery of retrofit measures to private and tenant houses.
Emissions Source	Domestic heating for private and tenanted houses
Owned by	Head of Environmental Services
Dates	Start: 2021 Finish: Ongoing
Emissions Impact	TBD
Cost	Phase 1b=£568k, Phase 2 = £425k

Action Details	DSP5 – Public EV infrastructure expansion – Planning and Implementing of EV charging points across the District, through OZEV and partnership funding
Emissions Source	Non-HGV transport
Owned by	Head of Environmental Services
Dates	Start: 2021 Finish: 2024
Emissions Impact	TBD
Cost	£100k (depending on successful bid for external funding) & 200 hours

Action Details	DSP7 – Ongoing review of Hydrogen fuel usage, production and distribution infrastructure development proposals across South Derbyshire.
Emissions Source	Transport
Owned by	Head of Environmental Services
Dates	Start: 2022 Finish: 2024
Emission Impact	Reduction in fleet carbon emissions
Cost	200 hours

Action Details	DSP9 – Ongoing review and detail the climate adaption actions (tree planting and flood resilience plus others) that SDDC are taking across the District.
Emissions Source	Carbon sequestration from all sectors across South Derbyshire
Owned by	Head of Environmental Health Services
Dates	Start: 2022 Finish: 2024
Emissions Impact	TBD
Cost	200 hours

Action Details	DSP11 Work in partnership with Derbyshire County Council to create a collaborative pathway to carbon zero across Derbyshire
Emissions Source	All
Owned by	Head of Environmental Services
Dates	Start: 2021 Finish: Ongoing
Emissions Impact	Unknown
Cost	100 hours

Action Details	DSP12- Partner with Derbyshire County Council to engage with UK Government for resource, funding and relevant powers to deliver Climate and Environment Plans
Emissions Source	All
Owned by	Head of Environmental Services
Dates	Start: 2021 Finish: Ongoing
Emissions Impact	Unknown
Cost	100 hours
Action Details	DSP19 Ongoing development of a communication/signposting channel for engaging with South Derbyshire households to support reduction of energy consumption advice promotion.
Emissions Source	All households
Owned by	Head of Environmental Health Services
Dates	Start: 2022 Finish: 2024
Emissions Impact	TBD
Cost	200 hours

## Finance - Service Plan Actions 2023/24

### In-house actions.

Action Details	ISP15 – Ongoing review of Council finance and investments to embed in carbon neutrality
Emissions Source	De-investment in fossil fuel sector
Owned by	Head of Finance
Dates	Start: April 2021 Finish: April 2024
Emission Impact	Investment in green economy
Cost	50 hours plus a potential improved return on investment.

Action Details	ISP16 – Ongoing review of costing/finance of Climate and Environment Transformative actions to establish/verify current and future funding sources to implement these actions.
Emissions Source	All high emission sources and locations identified.
Owned by	Head of Finance /Head of Environmental Health
Dates	Start: 2021 Finish: 2024
Emission Impact	All high emission sources.
Cost	500 hours

## Housing Services - Service Plan Actions 2023/24

### In-house actions.

Action Details	ISP1 – Ongoing Improvement of content, quality and quantity of the Social Housing Stock Condition Survey data.
Emissions Source	Heat and electricity - this is outside of the SDDC's controlled emissions and not part of the 2030 carbon neutral target.
Owned by	Head of Housing Services
Dates	Start: 2022 Finish: July 2028
Emission Impact	Current heat and electricity emission estimate is 9,200 – 13,200 tCO <sub>2</sub> e
Cost	500 hours

Action Details	ISP7 – Development of EV charging options available for the transition of housing fleet to electric
Emissions Source	Fleet fuel
Owned by	Housing
Dates	Start: 2023 Finish: 2024
Emission Impact	Reduction in fleet emissions
Cost	100 hours

Action Details	ISP13 – Create and develop a programme to educate and inform residents/public on using low carbon heating sources effectively
Emissions Source	Household heating
Owned by	Head of Housing
Dates	Start: April 2022 Finish: April 2024
Emissions Impact	Reduction in electricity emissions as National Grid decarbonises to 2030.
Cost	50 hours to implement.

## Operational Services - Service Plan Actions 2023/24

### In-house actions.

Action Details	ISP5 - Review of the Fleet Procurement Plan to identify and detail the options, cost, and timeframe to decarbonise the SDDC Waste vehicle fleet (EV's, Hydrogen/diesel mix and Hydrogen). This review will include the infrastructure and storage requirements of decarbonising the fleet.
Emissions Source	Vehicle fuel (diesel) at Boardman Depot = 588 tCO2e
Owned by	Head of Operational Services
Dates	Start: April 2021 Finish: April 2024
Emission Impact	Reduction Operational fleet emissions to carbon neutral = 588 tCO2e
Cost	300 hours

Action Details	ISP8 – Continued phased replacement of grounds maintenance machinery (105 x mowers, grass-cutters, etc) with electric alternatives.
Emissions Source	Fuel at Boardman Road depot
Owned by	Head of Operational Services
Dates	Start: June 2021 Finish: April 2024
Emission Impact	Reduction of carbon emissions = 10 tonne CO2e (estimated)
Cost	£250,000 for completed replacement (indicative).

Action Details	ISP30 – Ongoing waste collection service review to support the reduction in waste and increase in recycling rates and composted rates
Emissions Source	Waste collection
Owned by	Head of Operational Services
Dates	Start: April 2022 Finish: April 2024
Emission Impact	Reduction in waste emissions
Cost	100 hours

## Organisational Development and Performance - Service Plan Actions 2023/24

### In-house actions.

Action Details	ISP17 – Develop a full equality, diversity and inclusion impact assessment of SDDC’s Climate and Environment Action Plan
Emissions Source	All
Owned by	Head of Organisational Development and Performance
Dates	Start: 2023 Finish: 2024
Emission Impact	All
Cost	500 hours

Action Details	ISP29 – Continued development of Climate and Environment Communication Plan to inform, educate and make all stakeholders aware of Environmental Sustainability, Climate Change, Carbon emission sources, decarbonisation measures and carbon neutral journey. Stakeholders – SDDC employees, Councillors, Residents (climate activists, pragmatists, and deniers), specific demographics, Businesses, other Local Authorities, and third-party organisations
Emissions source	All
Owned by	Head of Organisational Development and Performance/Head of Environmental Health
Dates	Start: 2021 Finish: Annual ongoing
Emissions Impact	Ongoing support of reduction of all emissions from in-house and district-wide emissions
Cost	200 hours staff time per year

### District-wide Actions

Action Details	DSP16 – Annual creation of a community engagement program for Climate Change across South Derbyshire that will engage and consult with different sectors and communities with the SDDC’s carbon neutral journey and the specific actions that are required to deliver the 2030 target.
Emissions Source	All sources across South Derbyshire
Owned by	Head of Organisational Development and Performance
Dates	Start: 2021 Finish: 2030
Emission Impact	Encouraging carbon footprint reduction
Cost	£20k + additional 0.5 FTE

Action Details	DSP17 – Ongoing support of developing the community engagement program (DSP16) for Climate and Biodiversity Change across South Derbyshire supporting the decarbonisation of South Derbyshire.
Emissions Source	All sources across South Derbyshire
Owned by	Head of Environmental Health and Organisational Development and Performance
Dates	Start: 2022 Finish: 2023
Emission Impact	Encouraging carbon footprint reduction
Cost	TBD

## Planning and Strategic Housing Services – Service Plan Actions 2023/24

### In-house actions.

Action Details	ISP3 – Embed carbon neutrality in the new SDDC Local Plan.
Emissions Source	Energy efficiency, Gas, electricity, and water supply from all sources and into all buildings. Includes Heat, electricity, and transport emission sources.
Owned by	Head of Planning and Strategic Housing
Dates	Start: 2021 Finish: 2024
Emission Impact	Reduction in carbon emissions in all new build
Cost	300 hours

### District-wide actions.

Action Details	DSP13 – Ongoing creation and promotion of sustainable travel to work plans (sustainable) for job creation/growth areas
Emissions Source	Vehicle
Owned by	Head of Economic Development and Head of Planning and Strategic Housing
Dates	Start: 2021 Finish: 2025
Emission Impact	Reduce vehicle mileage and promote public transport
Cost	100 hours

Action Details	DSP14 – Plan on Influencing and promoting the embedding of carbon reduction and climate resilience mitigation into the East Midlands Inter-Modal Park 'Freeport'.
Emissions Source	Road and Rail transport
Owned by	Head of Economic Development/Head of Planning and Strategic Housing Services
Dates	Start: 2021 Finish: 2025
Emission Impact	Creation of green technology hubs to reduce emissions
Cost	TBD

## Legal and Demographic Services - Service Plan actions 2023/24

### District-wide actions.

Action Details	DSP6 – Ongoing development of a feasibility study to support the transition of South Derbyshire private taxi hire service to low carbon emission vehicles
Emissions Source	Reduction in transport sector carbon emissions
Owned by	Head of Legal and Demographic Services
Dates	Start: 2022 Finish: 2024
Emission Impact	Tbc
Cost	100 hours

# South Derbyshire District Council Environmental Policy



## Purpose.

The Council is committed to delivering all services and activities in a sustainable manner. We aim to reduce our impacts on the environment, and to enhance our environment.

## We will achieve this through:

- Ensuring continual improvement of the environmental management system to allow environmental performance enhancement.
- Assessing the impacts of Council activities and seeking to manage risk and reduce their impact on the environment.
- Setting environmental objectives to improve environmental performance.
- Following the environmental management system's processes to ensure adherence to compliance obligations and where possible, best practice.
- Communicating and training to raise awareness of environmental matters and to encourage environmental best practice among employees, elected members, and local communities.
- Protecting, conserving, and enhancing South Derbyshire's natural, historic, and cultural surroundings and enhancing biodiversity.
- Preventing pollution through reducing energy consumption, improved water and waste management, reducing staff travel, and taking climate emergency interventions.
- Ensuring the environmental impact of goods and services is considered within procurement decisions by utilising life cycle thinking.
- Ensuring services are resilient to extreme weather and a changing climate.
- Working with suppliers, contractors, and tenants to lessen their environmental impacts.
- Working with partners and neighbouring authorities to work towards wider sustainable goals.
- Ensuring continued certification of our environmental management system to ISO 14001.



**South  
Derbyshire  
District Council**



<b>REPORT TO:</b>	<b>ENVIRONMENTAL AND DEVELOPMENT SERVICE COMMITTEE</b>	<b>AGENDA ITEM: 09</b>
<b>DATE OF MEETING:</b>	<b>21 SEPTEMBER 2023</b>	<b>CATEGORY: RECOMMENDED</b>
<b>REPORT FROM:</b>	<b>STRATEGIC DIRECTOR (SERVICE DELIVERY)</b>	<b>OPEN</b>
<b>MEMBERS' CONTACT POINT:</b>	<b>MATTHEW HOLFORD, HEAD OF ENVIRONMENTAL SERVICES</b> <a href="mailto:matthew.holford@southderbyshire.gov.uk">matthew.holford@southderbyshire.gov.uk</a> ,	<b>DOC:</b>
<b>SUBJECT:</b>	<b>ELECTRIC VEHICLE CHARGE POINT INFRASTRUCTURE</b>	
<b>WARD(S) AFFECTED:</b>	<b>ALL</b>	<b>TERMS OF REFERENCE: EDS15,</b>

## **1.0 Recommendations**

- 1.1 That the Committee approves the updated Electric Vehicle (EV) Charge Point Infrastructure Plan to deliver a phased approach to delivering residential EV charging infrastructure in an equitable way and with due consideration to the geography of South Derbyshire.
- 1.2 That the Committee approves the receipt of funding from D2N2 for the installation of electric charge points at the Boardman Road Depot and approves the acceptance of additional funding for extra charge points if it becomes available.
- 1.3 That this Committee recommends to Finance and Management Committee the approval of the proposed reallocation of £50,000 originally earmarked for the installation of electric charge points at the Boardman Road Depot to fund the installation of electric charge points at an alternative suitable location.
- 1.4 That, if successful, this Committee approves the receipt of funding from Derbyshire County Council under the Low Emissions Vehicle Infrastructure project for the installation of electric charge points at the relevant SDDC land nominated in the project bid.
- 1.5 That the Committee welcomes that this EV Charge Point Infrastructure Plan exploits the current external funding opportunity from both the UK Government and third-party partnership. In doing so this Plan represents a further step in bridging the acknowledged gap between available Council funding and the Council's climate neutral ambitions.

## **2.0 Purpose of the Report**

- 2.1 To seek Committee approval for an updated EV Charge Point Infrastructure Plan to continue the delivery of an equitable District wide EV charge point Infrastructure and to enable the Council to facilitate the future proofing of South Derbyshire as the transport sector transitions to Electric Vehicles (EV's).

- 2.2 To seek Committee approval for further bids for external funding to support the delivery of an electric vehicle recharge infrastructure.
- 2.3 To seek Committee endorsement of the proposed reallocation of existing funding to support the continued development of the South Derbyshire electric vehicle recharge infrastructure.

### **3.0 Detail**

#### **Background**

- 3.1 On 12 August 2021, Environment and Development Services Committee approved an Electric Vehicle Charge Point Infrastructure Plan ('The 2021 Plan').
- 3.2 The 2021 Plan set out a three phased approach to promote EV ownership. This Plan aimed to future proof the District, to support South Derbyshire residents without 'off-street' parking and to take advantage of the Government and third-party funding opportunities.
- 3.3 The contents of this report provide Committee with
  - a) an update on the progress of the delivery of the 2021 Plan,
  - b) a request to approve a funding offer from D2N2,
  - c) a request to reallocate existing funding approved for electric charge point installation,
  - d) information about other funding bid submissions for electric charge point infrastructure.
- 3.4 Since the Plan was approved, it has also become nationally mandatory for all new build residential and non-residential development to include the provision of electric charge points under Approved Document S of the Building Regulations.
- 3.5 We can therefore be confident that the private sector provision of electric charge point infrastructure is expanding at the same rate of growth as other development in the District.

### **4.0 Progress Against the 2021 Plan**

- 4.1 **Phase 1** – Council owned car parks.
- 4.2 Based on the funding criteria being offered by the Office for Zero Emission Vehicles (OZEV), officers carried out basic feasibility studies into all of the Councils own car parks to identify those which had the greatest probability of qualifying for funding for the installation of off-street electric charge points.
- 4.3 Three car parks (Hatton, Hilton and Melbourne Assembly Rooms) were identified as being the most viable car parks to support EV charge points. Bids for all three were submitted to OZEV and all three were each awarded funding for four fast chargers (7kv) serving eight bays.
- 4.4 The installation of these 24 charge points in the three car parks was completed in spring 2023. This now brings the total provision of publicly accessible charge points hosted on land owned by SDDC to 42.

- 4.5 The remainder of the Council-owned public car parks were considered to be commercially unfeasible because of their limited size and/or inaccessibility to live voltage infrastructure, however the 2021 Plan committed to keep this under review.
- 4.6 Recent developments in relation to Council owned car parks are discussed in section 5 of this report.
- 4.7 **Phase 2** – Identification of suitable Parish Council car parks.
- 4.8 A number of car parks owned by Parish Councils were identified by officers as being potentially well suited to bids for funding from OZEV.
- 4.9 Discussions with OZEV about the feasibility of SDDC supporting parish councils to submit their own bids for funding did not indicate that any such bids were likely to be successful. Therefore, action to support Parish Councils to submit their own OZEV bids did not progress.
- 4.10 An opportunity to enable EV installations in Parish Council car parks is emerging through the LEVI scheme which is discussed in section 5 of this report.
- 4.11 **Phase 3** – Identify suitable ‘on-street’ parking locations across South Derbyshire.
- 4.12 ‘On-street’ EV charging provision will mainly fall to Derbyshire County Council as the highways authority to oversee.
- 4.13 SDDC officers have been actively collaborating with Derbyshire County Council to gather data and evidence to identify candidate locations for future on street EV charging provision under the LEVI scheme (further information on this scheme is provided in the next section of this report).

## **5.0 Recent Developments**

- 5.1 **Capital Funding for EV Charge points.** Finance and Management Committee on 8th October 2020 considered a report which evaluated various capital bids.
- 5.2 One of the capital bids which was approved in the report was for a project to install electric vehicle recharge infrastructure at Boardman’s Depot. The purpose of this project was to enable the Councils own transport fleet to start to transition from diesel to electric. The approved capital allocation for the project was £50,000. The proposed delivery of this project was in Year 3 of the programme of projects (i.e. 2023/24).

### **D2N2 Funding Offer**

- 5.3 D2N2 are currently offering shared funding network support for all local authorities in the Derbyshire and Nottinghamshire region to install EV charge points on Council owned land.
- 5.4 The purpose of the D2N2 funding is to provide a network of recharge locations across the region which are accessible to be used by electric vehicles from any other public sector organisation. The goal is to encourage a more rapid conversion of the public sector transport fleet to electric by giving greater assurance about accessibility of charge points across the region.
- 5.5 SDDC been offered funding to install 1x 52kW and 2 x 5kW EV chargers out of a total project allocation of £750k.

5.6 The funding would not require any contribution from SDDC. The funding does not come with any conditions other than that the electricity provider will need to be the same provider as that being used across the rest of the D2N2 shared funding network.

### **LEVI (Low Emission Vehicle Infrastructure)**

5.7 Derbyshire County Council have successfully bid for £6.2 million indicative LEVI funding to support the scaling up of EV charging infrastructure across Derbyshire. This is split into three 3 categories.

5.8 Community Charging Hubs (£2.5m) to provide district Council led site selection for 'community hubs' (long stay/residential use car parks).

5.9 Following public consultation, including consultation with SDDC officers, seven (7) car parks sites under the control of the District Council have been included on a short-list for funding as Community Charging Hubs. The seven shortlisted sites are summarised on the following table.

Car Park Name	Area	Local Authority	Approx. Spaces
High Street	Melbourne	South Derbyshire	100+
Blacksmiths Lane	Woodville	South Derbyshire	20-50
Hilton Road, Etwall	Etwall Leisure Centre	South Derbyshire	20-50
Wilne Lane	Shardlow	South Derbyshire	20-50
Rink Drive	Swadlincote	South Derbyshire	50-100
Burton Road	Repton	South Derbyshire	0-20
New Market Square	Swadlincote	South Derbyshire	TBC – New Site

5.10 Funding for the shortlisted sites is likely to be announced in summer 2023 after which the next stage is for legal T's & C's between DCC (as the charge point owner) & SDDC (as the host) to be drawn up with an aim to install in winter 2023.

5.11 Street Lighting Residential Charging Network (£2.5m) to provide 1,000 streetlight chargers across Derbyshire to provide overnight charging for residents without off-street parking. These will be taking charge from the streetlights. These will be identified in conjunction with district councils but will be owned by DCC and operated by the County Council Highways service because they already own the streetlights.

5.12 We have no current information about the funding or timescales for this aspect of the project.

5.13 Parish & Town Council provision £1.6m to develop initiatives to ensure Parish & Town Council, villages and rural communities are fully integrated into the Derbyshire Charging Network. Funding needs to be confirmed before any selection will be started. SDDC have done some work around this already, identifying potential Parish Council/Village Hall car parks that strategically & geographically fit across South Derbyshire. Ten (10) sites have been recommended to the County Council for inclusion on the 'long listed' sites for further investigation.

### **Decarbonising SDDC Fleet and Grey Mileage**

- 5.14 The 2021 Plan only related to work to improve the publicly accessible electric recharge infrastructure in South Derbyshire. It did not pay any specific attention to decarbonising SDDCs own transport fleet, nor to supporting SDDC staff, councillors or visitors to Council buildings to transition to electric vehicles.
- 5.15 As part of the Councils commitment to sustainable travel, since 2020 we have carried out an annual staff travel survey to understand changing trends and to predict future demands. Results from this survey suggests that there is a latent demand within SDDC staff to transition to electric vehicles which would be accelerated by the provision of recharge points near to their place of work.

### **Wider Demand for EV Charge points**

- 5.16 The acceleration of EV take up and the transition of petrol and diesel vehicles to Ultra Low Emission Vehicles (ULEV) is inevitable with the Government's latest ban on the selling of new petrol and diesel cars likely to take effect in 2030.
- 5.17 Research undertaken by Midlands Connect forecasts the uptake of EV's across the Midlands will be up to 9% by 2025 and up to 40.5% by 2030. The National Grid is forecasting that there will be 10.6 million EV's on the UK roads by 2030 and up to 36 million by 2040.
- 5.18 Although experts agree that the majority of EV charging will be done at home and work locations, many residents in both urban and semi-rural locations do not have access to 'off-street' parking and consequently will have difficulties in home charging.
- 5.19 To support the forecasted acceleration of future EV uptake and the challenge for residents without 'off-street' parking the Office for Zero Emission Vehicles (OZEV) is allocating £20m of funding for 2021/22, administered by the Energy Savings Trust (EST) for eligible projects from Local Authorities that meet the funding requirements.

### **Proposal**

- 5.20 Given the recent developments outlined in Section 5 of this report, Committee are recommended to approve the following:
- 5.21 That the £50,000 allocated to the proposed installation of charge points at Boardman Depot be reallocated to support the installation of EV chargepoints at an alternative location which supports the transition of SDDC fleet, SDDC staff, SDDC councillors and the public to electric.
- 5.22 Currently the primary candidate site would be at the Civic Way offices, however given the rapidly changing nature of funding for EV infrastructure it would be advisable not to be prescriptive about the specific location.
- 5.23 In accordance with the constitution, it is also necessary for this Committee to approve the receipt of the external funding from D2N2 (for the Boardman Road EV charge points) and from Derbyshire County Council (for the LEVI funded charge points).

## **6.0 Financial Implications**

- 6.1 The installation of electric charge points at the Boardman Road Depot will be met in full by D2N2. The costs of the electrical use from the charge points will be met as a revenue cost by SDDC.
- 6.2 The installation of electric charge points at Civic Way offices or other appropriate location will be met from the £50K originally allocated to install charge points at

Boardman Road depot. The charge points will be available on a pay per use basis and therefore payment for electrical use will be by the vehicle driver.

- 6.3 The installation of the charge points approved under the LEVI project will be funded via Derbyshire County Council. The charge points will be available on a pay per use basis and therefore payment for electrical use will be by the vehicle driver.

## **7.0 Corporate Implications**

### **Employment Implications**

- 7.1 There are no employment implications, the EV charge-point infrastructure proposals will be led by the Climate and Environment Officer.

### **Legal Implications**

- 7.2 Potential legal implications associated with the drafting of Memorandum of Understanding / Wayleave Agreements, etc with relevant parties.

### **Corporate Plan Implications**

- 7.3 These Phased proposals meet the Corporate Plan key aims of:
- 7.3.1 Striving to make South Derbyshire District Council carbon neutral by 2050
  - 7.3.2 Working with residents, business and partners to reduce their carbon footprint.
  - 7.3.3 Encourage and support business development and new investment in the District.

### **Risk Impact**

- 7.4 The primary risks are identified as:
- 7.4.1 To identify and respond to possible resistance to the proposal from local communities.
  - 7.4.2 Long-term addition of the EV infrastructure to Council assets (risk) and income generation (opportunity).

## **8.0 Community Impact**

### **Consultation**

- 8.1 The EV infrastructure commissioned to date appears to have been generally well received. There have been some concerns expressed about the EV charge point infrastructure at Arnold Close car park, based on a perception of a possible reduction of car parking spaces for residents' cars that have been converted into EV charging spaces.
- 8.2 With reference to the proposals in this report the proposed mitigation measures are as follows:
- 8.2.1 Ensuring car parks submitted have enough car parking spaces to cater for current residents and EV charging.
  - 8.2.2 Consultation with Committee members through this report.

8.2.3 Consultation prior to the bid submission with relevant Parish Councils following approval of this report.

8.2.4 Proposed local community communication and consultation once this report has been approved.

### **Equality and Diversity Impact**

8.3 Currently electric vehicles (EV) are more expensive than comparable petrol/diesel cars and the secondhand market for EV's is very limited. This does create an equality impact as not everyone can afford EV's. This negative impact has been mitigated by ensuring that the EV parking bays are able to be used by all local residents, irrespective of the type of car for a period of time. This allowance will be monitored, and the status may be changed as and when the uptake of EV's increases to a level where dedicated and enforced EV charging point bays are required.

8.4 Concerns have been expressed by advocates on behalf of the disabled community that the EV bays installed to date do not cater for drivers of disabled vehicles. This will be a topic of discussion with the managers of the LEVI scheme if the bid is successful.

8.5 A positive impact is that the Council are future proofing their plans to ensure that residents that do not have off-street parking are able to access EV charge points across South Derbyshire in an equitable way.

### **Social Value Impact**

8.6 There are a number of social value impacts to this proposal:

8.6.1 South Derbyshire District Council is promoting the transition from petrol/diesel cars to EV's inline with the UK Governments agenda.

8.6.2 The Council is supporting the reduction of carbon emissions from the transport sector across South Derbyshire which supports the mitigation of the climate crisis, reduces air pollution and improves the health and wellbeing of residents.

### **Environmental Sustainability**

8.7 The carbon emissions from the Transport Sector are responsible for 47% of the total carbon emissions of South Derbyshire and are the single highest emitting sector. Any decarbonization action, such as the promotion and increase of EV usage supports the reduction in the overall carbon footprint of the District and the improvement of environmental sustainability across South Derbyshire.

8.8 EV charge point infrastructure promotes and supports the reduction of the carbon footprint of its residents as well as the vehicle travelling population in general that transverses South Derbyshire. This fits with the key priority of the Corporate Plan which is to make South Derbyshire 'a better place to live, work and visit at the heart of the National Forest'.

## **9.0 Conclusions**

9.1 South Derbyshire has already made extensive progress with the installation of publicly accessible EV charge points by virtue of accessing funding to install them in five of its car parks.

- 9.2 The proposals in this report will facilitate the installation of charge points in up to nine further locations in South Derbyshire, with an additional ten sites on the LEVI 'long-list'.
- 9.3 The proposals will directly support drivers across South Derbyshire who aspire to convert to electric vehicles but for whom access to charge points is limited or unaffordable.
- 9.4 The proposals will also directly contribute to enabling SDDC own transport fleet to transition to electric as well as supporting staff and members to transition to electric.

## **10.0 Background Papers**

Environment and Development Services Committee, 25 November 2019 - [Staff Travel Action Plan](#)

[Full Council, 27 June 2019, Climate and Environment Strategy 2020](#)

Environmental and Development Service Committee May 2021, [Climate and Environment Action Plan 2021 -2030](#)

[Environment and Development Services Committee, Bid for Electric Vehicle Recharge Points, 24 September 2020](#)

12 August 2021, Environment and Development Services Committee approved an Electric Vehicle Charge Point Infrastructure Plan

<b>REPORT TO:</b>	<b>ENVIRONMENTAL &amp; DEVELOPMENT SERVICES COMMITTEE</b>	<b>AGENDA ITEM: 10</b>
<b>DATE OF MEETING:</b>	<b>21 SEPTEMBER 2023</b>	<b>CATEGORY: (See Notes) DELEGATED</b>
<b>REPORT FROM:</b>	<b>STRATEGIC DIRECTOR (SERVICE DELIVERY)</b>	<b>OPEN</b>
<b>MEMBERS' CONTACT POINT:</b>	<b>JESSICA CHEADLE, 07435829964 <a href="mailto:Jessica.cheadle@southderbyshire.gov.uk">Jessica.cheadle@southderbyshire.gov.uk</a></b>	<b>DOC:</b>
<b>SUBJECT:</b>	<b>DESIGNATION OF FINDERN NEIGHBOURHOOD AREA</b>	
<b>WARD(S) AFFECTED:</b>	<b>WILLINGTON AND FINDERN</b>	<b>TERMS OF REFERENCE:</b>

## **1. Recommendations**

1.1. That the Committee formally designates the Findern Neighbourhood Area in accordance with the application from Findern Parish Council.

## **2. Purpose of the Report**

2.1 To draw the Committee's attention to the requirements placed upon the Council within the Neighbourhood Planning (General) Regulations 2012 (as amended) regarding the need to designate the Findern Neighbourhood Area to enable Findern Parish Council to proceed with preparing a Neighbourhood Development Plan for the area.

## **3. Detail**

3.1 On 19th July 2023 date the Council received an application from Findern Parish Council for the whole of Findern Parish (identified on the map at Appendix A) to be designated as a Neighbourhood Area for the purpose of preparing a Neighbourhood Development Plan. Under the Neighbourhood Planning (General) Regulations 2012 (as amended) where the Council receives such an application it must exercise its powers under section 61G of the Town and Country Planning Act 1990 to designate the specified area as a neighbourhood area.

3.2 The designation of the Neighbourhood Area means that the community can proceed with the production of a Neighbourhood Development Plan. There is clear logic for Findern Parish Council to prepare a neighbourhood plan for its own parished area.

## **4. Financial Implications**

4.1 There is no direct financial implication for the designation of the Neighbourhood Plan Area.

## **5. Corporate Implications**

5.1 There is a requirement for the Local Planning Authority to formally designate Neighbourhood Areas if certain conditions set out in the Regulations are met. These conditions have been met (most significantly the Parish Council preparing a plan for its own parish) and this designation will ensure that the Council is in compliance with its duties.

## **6. Community Impact**

6.1 Local communities are not able to progress with a Neighbourhood Development Plan unless the identified Neighbourhood Area has been formally designated. Findern Parish Council has identified a desire to pursue this course of action supported by community volunteers who have already been identified. Designation will enable the community to exercise its rights established within the Localism Act. The designation of the Neighbourhood Area will enable the community of Findern to continue the process of preparing a Neighbourhood Development Plan.

## **7. Conclusions**

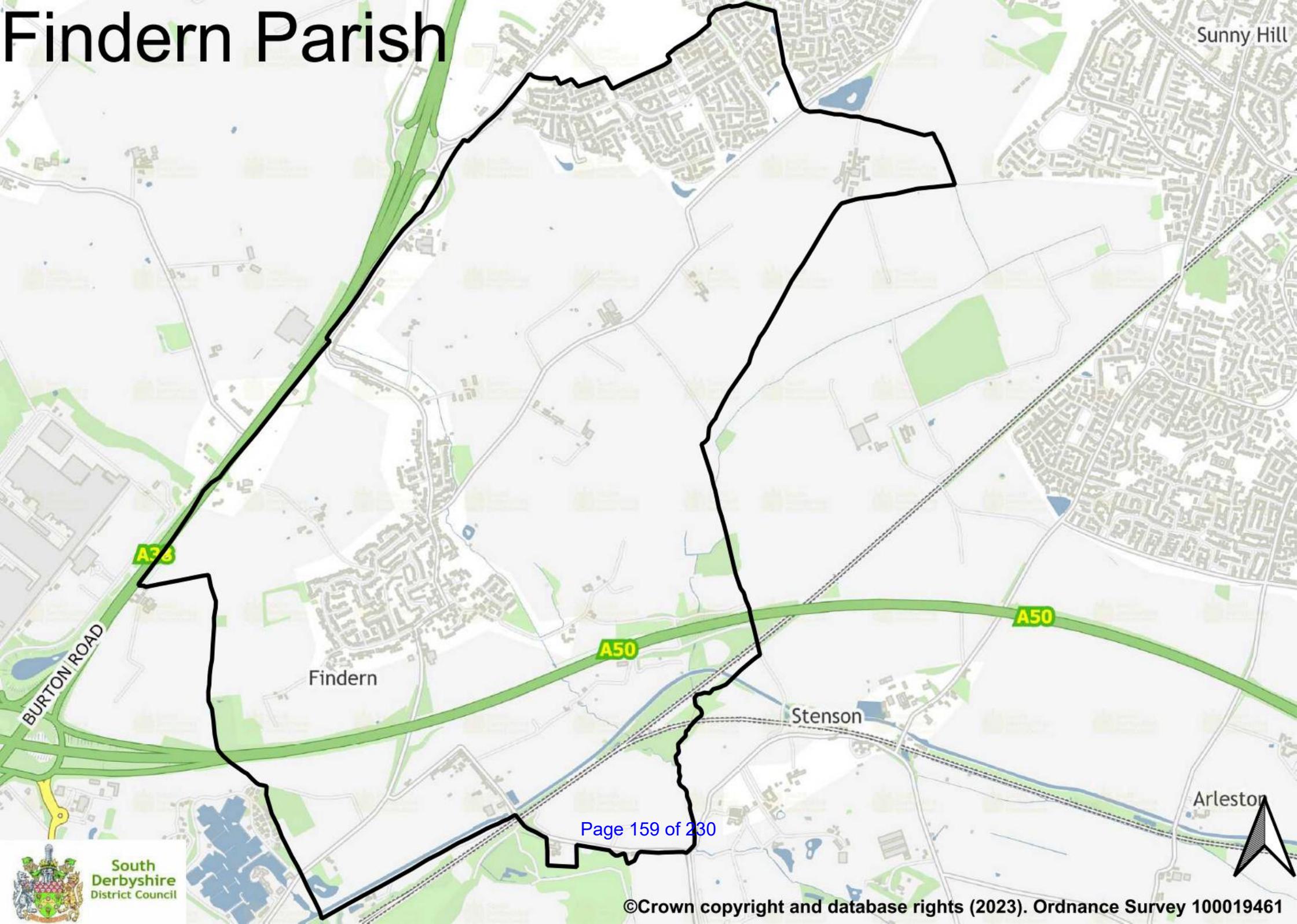
7.1 The Findern Neighbourhood Area should be designated as a Neighbourhood Area for the purposes of neighbourhood planning.

## **8. Background Papers**

8.1 Appendix A – Map of area to be designated.

8.2 Appendix B – Application from Findern Parish Council.

# Findern Parish



Sunny Hill

A36

BURTON ROAD

Findern

A50

A50

Stenson

Arleston

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South Derbyshire District Council

**Application to designate a Neighbourhood Area**  
**Town and Country Planning Act 1990**  
**Neighbourhood Planning (General) Regulations 2012**

1. Name of Parish Council – **FINDERN PARISH COUNCIL**

2. Name of Neighbourhood Area – **FINDERN PARISH**

3. Parish Clerk details: - **Kate Sharpe – Clerk & RFO**

**Findern Parish Council  
Parish Rooms  
Lower Green  
Findern  
Derbyshire  
DE65 6AD**

**Email:** [REDACTED]  
[REDACTED]

4. Details for primary contact (if different to Parish Clerk) – as above.

5. Additional contact: - **Tammy Brown – Chairman of Findern Parish Council**

**Email:** [REDACTED]  
[REDACTED]

6. Relevant body:

***I confirm that we (Findern Parish Council) are the relevant body to undertake neighbourhood planning in our area in accordance with Section 61G of the 1990 Act and Section 5C of the 2012 Regulations.***

7. Intention of the Neighbourhood Area:

***We intend to undertake a Neighbourhood Development Plan.***

8. Explanation/justification of choice of area:

The residents of the parish of Findern seek to develop a Neighbourhood Development Plan to enable the local community to influence development and growth in our area; we have designated the parish boundary as the area which will be covered by the plan. The area conforms with boundaries from any of the available local statistics and the ongoing South Derbyshire District Council local planning process.

The parish of Findern is bordered by Derby City to the north and to the west and south, the A38 and A50. The parish sits on the urban-rural fringe. The community of Findern village feels rooted in the countryside and the village's historic centre surrounded by farming land and a rural environment, with important nature and wildlife sites to the south of the village; whilst the community of the new Highfields housing estate, which is adjacent to the boundary with Derby City, looks towards this urban area and the services it offers.

It is considered important to include the whole of the parish within the development plan so that it reflects the unique stance of the two communities within the parish and ensure what is important to both is protected. Findern has been identified as a Local Services Village within the adopted Local Plan, with Highfields designated as a potential local centre for retail.

It is concerning that during the production of the adopted Local Plan, it was established that Derby City could not accommodate all its housing needs within its administrative boundary. The countryside setting of the parish of Findern, and the proximity to Derby all add to the pressures for development in and around the parish, making it essential for the residents of the parish to have their say and help develop a plan which contributes positively to the area.

It was considered whether the area to be designated should be expanded to include neighbouring parishes. Willington is undertaking its own neighbourhood development plan. Neither Egginton and Burniston are currently looking at their own neighbourhood development plans; however, it was decided that an invitation to these parishes for inclusion in a wider area would make the plan more complicated because of their conflicting requirements, e.g., proximity to the proposed Freeport initiative and in the case of Burnaston, having the Toyota manufacturing plant within its boundary.

Findern Parish Council has been established for many years and is recognised by the majority of residents as the local administrative and body serving the whole of the designated area; therefore, it will help the process if the Parish Council is seen to contribute on the development of the plan. It will help residents understand the steps involved and show clear leadership and purpose, encouraging residents to identify with and support the development of the plan. The Parish Council can also contribute in terms of the required finance management. Regular communication is aided by the majority of the area selected being covered by the planned parish newsletter which will be delivered to all houses in the village and the Highfields development.

Residents do want to have a say in the future planning of the village and surrounding area. In a recent survey of all households in the parish, 100% respondents from both the village and the new housing estate of Highfields supported a Neighbourhood Development Plan with 32 respondents indicating that they would be interested in being involved in the process.

9. Extent of the area (map to be included)

**The Findern Parish boundary has been adopted as the proposed Findern Neighbourhood Development Plan area boundary. See attached plan.**

10. Declaration:

**Findern Parish Council hereby apply to designate a neighbourhood area as described on this form and the accompanying plan.**

Signed



**Position - CLERK & RESPONSIBLE FINANCIAL OFFICER  
FINDERN PARISH COUNCIL**

**Date - 19 July 2023**

Signed



**Position - CHAIRMAN  
FINDERN PARISH COUNCIL**

**Date - 19 July 2023**

<b>REPORT TO:</b>	<b>ENVIRONMENTAL AND DEVELOPMENT SERVICES COMMITTEE</b>	<b>AGENDA ITEM: 11</b>
<b>DATE OF MEETING:</b>	<b>21 SEPTEMBER 2023</b>	<b>CATEGORY:</b>
<b>REPORT FROM:</b>	<b>STRATEGIC DIRECTOR (SERVICE DELIVERY)</b>	<b>OPEN</b>
<b>MEMBERS' CONTACT POINT:</b>	<b>AMANDA VERNON, 07919 897691</b> <a href="mailto:Amanda.vernon@southderbyshire.gov.uk">Amanda.vernon@southderbyshire.gov.uk</a>	<b>DOC:</b>
<b>SUBJECT:</b>	<b>MEMBERSHIP OF THE LOCAL PLAN WORKING GROUP</b>	
<b>WARD(S) AFFECTED:</b>	<b>ALL WHERE THE REPORT AFFECTS THE DISTRICT AS A WHOLE <u>OR</u> SPECIFIC WARDS</b>	<b>TERMS OF REFERENCE:</b>

## **1.0 Recommendations**

- 1.1 To agree the appointment of five Members from this Committee to the Local Plan Working Group (LPWG).
- 1.2 In line with the Council's political proportionality, to receive three nominations from the Labour Group and two nominations from the Conservative Group, with appointments to be confirmed at the next meeting of Council.

## **2.0 Purpose of the Report**

- 2.1 To outline the purpose and importance of the Local Plan Working Group. To revisit the membership of the group in accordance with the Council's political proportionality.

## **3.0 Executive Summary**

- 3.1 Following the District Council elections in May 2023, the membership of the Local Plan Working Group (LPWG) is revisited in accordance with the political proportionality of the Council. The working group is an information sharing group and does not make decisions on policy, this remains a matter for this Committee.
- 3.2 The purpose of the LPWG is to enable an informal dialogue between Council Officers and Members, with a view to Councillors on the Group sharing information with colleagues within their respective Groups.

## **4.0 Detail**

- 4.1 The Local Plan Working Group is an established forum for Planning Officers, Members and Senior Managers to discuss Local Plan issues in advance of the formal meetings of this Committee. The Group provides the opportunity to discuss Local Plan issues such as emerging evidence documents, on-going work with stakeholders

including neighbouring authorities, the Local Plan timetable, project plan and consultations.

- 4.2 Establishing strong working relationships between Officers, Members and Management is key for Local Plan production. The Local Plan will help to deliver the Council objectives set out in the Corporate Plan, assist the Council in delivering Council Strategies and assist with meeting government targets (e.g. housing delivery and environmental targets such as Net Zero). Local Plans often span political terms and following a process of public Examination by the Planning Inspectorate will need to be formally adopted by Full Council, therefore cross-party political inclusion in the process is key to success.

## **5.0 Financial Implications**

- 5.1 None as a direct result of this report.

## **6.0 Corporate Implications**

### **Employment Implications**

- 6.1 None as a direct result of this report.

### **Legal Implications**

- 6.2 None as a direct result of this report.

### **Corporate Plan Implications**

- 6.3 The Local Plan is a vehicle for delivery of aspirations set out in the Corporate Plan, including affordable housing delivery and protection and enhancement of the natural environment. The LPWG will help with the effective delivery of the Local Plan which in turn will deliver wider Council objectives set out in the Corporate Plan.

### **Risk Impact**

- 6.4 Delivery of the Local Plan could be hindered, not having an up-to-date Local Plan could result in the Council losing the ability to deliver development in a plan-led way and could make it harder for the Council to resist speculative development.

## **7.0 Community Impact**

- 7.1 As above, if the Council loses its ability to resist speculative development in less preferable locations, it could also mean that appropriate infrastructure is not delivered where it's needed, and that the Council's reputation is damaged with local communities as a result.

### **Consultation**

- 7.2 None.

### **Equality and Diversity Impact**

- 7.3 None as a direct result of this report.

### **Social Value Impact**

7.4 None as a direct result of this report.

### **Environmental Sustainability**

7.5 None as a direct result of this report.

### **8.0 Conclusions**

8.1 The LPWG is an important part of Local Plan production and should continue. The membership of the current LPWG should reflect the Council's political proportionality.

### **9.0 Background Papers**

None.

<b>REPORT TO:</b>	<b>ENVIRONMENTAL AND DEVELOPMENT SERVICES COMMITTEE</b>	<b>AGENDA ITEM: 12</b>
<b>DATE OF MEETING:</b>	<b>21 SEPTEMBER 2023</b>	<b>CATEGORY:</b>
<b>REPORT FROM:</b>	<b>STRATEGIC DIRECTOR (SERVICE DELIVERY)</b>	<b>OPEN</b>
<b>MEMBERS' CONTACT POINT:</b>	<b>AMANDA VERNON, 07919 897691 <a href="mailto:amanda.vernon@southderbyshire.gov.uk">amanda.vernon@southderbyshire.gov.uk</a></b>	<b>DOC:</b>
<b>SUBJECT:</b>	<b>THE DEPARTMENT FOR LEVELLING UP, HOUSING AND COMMUNITIES CONSULTATION ON IMPLEMENTATION OF PLAN-MAKING REFORMS</b>	
<b>WARD(S) AFFECTED:</b>	<b>ALL</b>	<b>TERMS OF REFERENCE: (</b>

## **1.0 Recommendations**

- 1.1 For Members to approve the submission of a response to the consultation in line with officer recommendations (detailed in Appendix 1).

## **2.0 Purpose of the Report**

- 2.1 To present the details of the current Department for Levelling Up, Housing and Communities consultation on the implementation of plan-making reforms. To consider the implications of the proposed amendments to South Derbyshire District Council and to approve a response for submission to the consultation (detailed in Appendix 1).

## **3.0 Executive Summary**

- 3.1 The consultation outlines proposed radical changes to the way in which Local Plans will be undertaken in the future. These changes are not proposed to be implemented until a year from now, and further delays are possible, therefore these changes are unlikely to have a significant negative bearing on the timescales of the current local plan process. The consultation includes the ambition to make the process more user-friendly, standardise the outputs, streamline the process and introduce statutory timeframes for plan production. The consultation also includes more details of the proposed Community Land Auction process and Supplementary Plans which are proposed to replace Supplementary Planning Documents.
- 3.2 The key concerns for the Council relate to the resources required to produce a new style Local Plan and the realism of producing a plan within the proposed statutory timescales.

## **4.0 Detail**

- 4.1 The government Department for Levelling Up, Housing and Communities is currently consulting on reforms to the plan-making system. Their aim is to make the Local Plan simpler, quicker to prepare and update and move the system of production and consultation to have a digital focus. The consultation will close on the 18<sup>th</sup> October 2023.
- 4.2 The new system of plan-making outlines six key stages of plan-making:
- scoping and early participation;
  - plan visioning and strategy development;
  - evidence gathering and drafting the plan;
  - engagement, proposing changes, submission;
  - examination; and
  - finalisation and adoption of the plan
- 4.3 Local Plans will be required to be produced as a single document. South Derbyshire District Council currently undertake a two-part plan process with strategic policies included in the part 1, and non-strategic policies included within part 2. The Council is currently updating its Part 1 Local Plan which will be submitted prior to the requirement for the new-style plan to be prepared. However, the Part 2 Local Plan will fall under the new (single plan) system and therefore it is unclear how these arrangements would dovetail together. The Council may potentially need to take the decision to start a new style Local Plan early (potentially as a government front-runner gaining assistance from the government to produce the plan), to proceed as currently planned and potentially have the Part 1 Local Plan re-Examined as part of a comprehensive single Local Plan when we are ready to produce the Part 2 or to rely on the Part 1 Local Plan subsidised by a suite of new Supplementary Plans to allocate sites in advance of a new style single part plan being prepared. It is considered that the option to prepare Local Plans in two parts should be retained.
- 4.4 To streamline the contents of the Local Plan the government is proposing to introduce a suite of National Development Management Policies covering topics that occur nationally (e.g. flooding and heritage). The government expect that this will replace the need to include many of the existing local Development Management policies within the plan which should largely focus on site allocations and specific local issues. The detail of the National Development Management Policies is not yet known and will be subject to further consultation at a later date. The lack of any further detail on the proposed National Development Management Policies makes it difficult for the Council to respond comprehensively to the consultation at this stage but this is a key issue that would determine if the Local Plan process could be streamlined in the way envisioned.
- 4.5 The government intend to set out a series of core principles in policy and guidance, around what plans should contain, to ensure plans are focused on the right things and to ensure that users are able to understand clearly the 'story' of how the planning authority's area will develop. Local Plans will be required to contain a locally distinct vision which would be used as the 'golden thread' with policies and allocations linking directly to delivering "measurable outcomes" set out by the strategy. Links should be made more explicitly between the vision and other relevant corporate or thematic strategies produced by other authorities, public bodies and partnerships, to help secure more buy-in for local plans as vehicles of change.
- 4.6 Local Plan production will be required to take 30-months from start to adoption. Under the current system there is no time limit for Local Plan production and the average time to produce a Local Plan is 7 years. This is a significant change which

will require substantial streamlining of the process and content of the Local Plan. There are concerns regarding the achievability of meeting these timescales particularly when considered against the proposed indicative timescale for plan-making including 3 gateway checks (which will consume between 3 and 4.5 months of this timescale), statutory consultation (which will consume 4.5 months of this timescale), Examination with modifications (which will consume 9 months of this timescale) leaving between 12 and 13.5 months to undertake all other local plan-making activities. There is concern that within these timescales there seems to have been no consideration of the time implications for cross-boundary working, particularly where Local Plan production between different authorities is misaligned. The consultation is largely predicated on the assumption that Councils work independently however, the proposed new 'alignment policy' (details of this have not yet been released) retains the requirement to work with neighbouring authorities on strategic issues.

- 4.7 There also seems to have been no consideration as to how the process fits within the political timeframes and this is something that will need to be managed by the Council to ensure cross-party engagement and ideally agreement on key issues. The government have not been clear about the penalty for not meeting the statutory timescale, however it could have implications for the need to demonstrate a five-year land supply position.
- 4.8 There will be a new requirement for authorities to start updating their Local Plans within five years of adoption, and in certain circumstances (details have not yet been provided), the government intends to require planning authorities to commence these updates earlier. The government previously consulted upon proposals to remove the need to demonstrate a five-year land supply where a Council has a recently adopted (within 5 years) Local Plan. This incentivises the Council to constantly review/update the Local Plan but this could lead to consultation apathy with stakeholders or could create uncertainty/erode confidence as development parameters are constantly changing/evolving.
- 4.9 The government are proposing three mandatory 'gateway' tests during Local Plan production to resolve issues prior to Examination. The checks will take between four and six weeks and will be undertaken by Planning Inspectors or independent specialists. The government will charge for these gateway checks on a 'cost recovery' basis from Local Planning Authorities to ensure a consistency of service. During these checks it is considered that the thirty-month time limit 'clock' should stop and that the cost of adhering to the mandatory checks should not be passed on to the Local Authority.
- 4.10 The government are also proposing a maximum timescale of six months for Examination by the Planning Inspectorate (with an additional three months if changes need to be consulted upon). Currently there are no Local Plans that go through Examination without any modifications and therefore the Council should assume a 9-month Examination. To achieve this Examiners will be appointed at commencement of the third gateway check, using panels of two or three Inspectors to increase efficiency. There will also be changes to the Matters, Issues and Questions (MIQs) part of the Examination whereby only the relevant planning authority is invited to submit responses. Examiners will have the capacity to pause Examinations for limited periods of time (maximum of six months). The Council has concerns regarding the capacity of the Planning Inspectorate to adhere to these timescales. At the current time the governments most recently updated [procedure guide for local plan examinations](#) (February 2023) states that Local Plan examinations "*will tend to last around a year, and sometimes longer*".

is not within the control of the Council however, it could have a significant impact on the Councils ability to achieve the overall 30-month timescale.

- 4.11 The Council will be required to 'notify' stakeholders and 'invite' participation prior to the commencement of the 30-month period. In addition, there will be two formal stages of consultation during plan production which will increase in length from the existing two six-week consultations to one eight-week and one six-week consultation (an increase in two weeks overall). The Council will be required to produce a new "project initiation document" setting out what engagement is planned and what resources and skills will be required to deliver this, this replaces the current Statement of Community Involvement. Changes to consultation process are not currently a concern however, in the context of the overall 30-month timescale there are insufficient allowances for the preparation and administration of consultations or the analysis of responses. Whilst the process is not linear it should be recognised that consultations are resource hungry which has implications for the ability of the team to undertake other work.
- 4.12 The government are also keen to standardise plan production with new requirements to populate user-tested digital templates to draft and present the Plan (and policies map), and introduce a requirement to publish standardised data in set formats throughout the process. Plan will be required to be produced digitally, rather than as "analogue" (PDF or paper). Local plans should be shorter, more visual and map-based, enabling communities to engage more easily with their content. It is proposed that Plan production will be supported by a digital 'pick and mix tool-kit' with a suite of tools that can be used by different types of authority at different stages of the plan cycle, to make the process more efficient, more cost effective and more accessible and would evolve over time as more best practice emerges. The move towards digitisation and a more engaging Local Plan is supported, however the skills and tools required to produce a standardised document should be available from the outset.
- 4.13 The government is also looking to reduce the evidence burden on Local Authorities to ensure that evidence is proportionate and appropriate. The details of how this is to be achieved is yet to be revealed and it is unlikely to be finalised until it has been tested through Examination and through the Courts. There will be a new requirement to produce a 'statement of compliance with legislation and national policy'. The government are proposing the 'freezing' of certain evidence at certain points in the process and will produce set methodologies for data production (to be consulted on further). It is proposed that only certain evidence can be questioned during Examination. The government are also proposing to amend the tests against which a Local Plan is examined.
- 4.14 The current Local Development Scheme which sets the formal local plan timetable will be replaced by a new, simpler requirement to prepare and maintain a local plan timetable. Local Plans will be supported by new Environmental Outcomes Reports and Infrastructure Delivery Strategies both of which were the subject of consultation earlier in the year.
- 4.15 A new system of monitoring is proposed that would have two distinct elements. Firstly, the Council will have to produce "*light touch annual return[s]*" which will report on several nationally prescribed metrics to assess the implementation of key policies against the output of the plan, similar to the current requirement to produce an Authority Monitoring Report. Secondly, within four years of the plan's adoption, the Council will have to prepare a fuller analysis of how planning policies and designations are being implemented and the extent to which the plan is meeting the

overall vision for the area. The scope and content of this report will be determined by the Council, but should be designed to inform the forthcoming update of the plan.

- 4.16 To support the local plan reforms new regulations, policy and guidance is proposed to be in place by autumn 2024. Transitional arrangements to the new system would begin in November 2024 with ten frontrunner authorities being chosen to receive support for the new system which would then be used as a template for other authorities. Following this it is proposed that all authorities would be ranked chronologically based on when then adopted their Local Plans and groups of 25 authorities will be allocated a six-month windows to commence plan-making so as to stagger the roll out of the new system. The Council considers that this system of roll-out should be revised to ensure that neighbouring authorities (particularly those forming a single Housing Market Area) should be on the same timescale.
- 4.17 The government are also consulting on a new avenue for Councils to adapt to change or add detail to existing policies via Supplementary Plans. These are proposed to carry the same weight as the Development Plan (i.e. the Local Plan) but be limited in scope to cover only a small geographic area of no more than two nearby sites or a specific policy issue with the exception of a Design Code which could cover the whole authority area. They will be subject to an independent examination which is currently envisaged to take the form of written representations unless the Examiner considers that hearing sessions are required. These would replace the existing Supplementary Planning Documents (SPDs) that provide guidance on how existing policies should be implemented. This replacement is not considered to be suitable as whilst SPDs carry less weight than Supplementary Plans they do not need to be examined and so can be produced quickly and make the Council more responsive to change. New Supplementary Plans are proposed to be subject to a single public consultation which given the weight of the final document does not seem to be adequate.
- 4.18 The government are also consulting on a new approach for Councils to capture the uplift in land value through the planning process through 'Community Land Auctions' (CLA). This is a process whereby Landowners provide the Council with the price that they would be willing to accept for their land. This forms part of a bidding process which the Council would then take into account as part of the development/site selection strategy. The Council would take out legally binding 'options' on sites which if/when allocated could be sold off to developers with increased certainty of development and the Council could capture the value difference between the site prior to allocation and the value of the site after it is allocated for development. The uplift gained by the Council would be ringfenced for spending on funding infrastructure (or administering the CLAs). The Council would also have the choice to develop the land themselves should they so wish. The potential financial gain would be considered as a matter of Soundness during Examination. Councils can still gain section 106 planning contributions for the land. It is not considered appropriate for financial gain to form part of the Councils considerations for site allocation.
- 4.19 In summary, changes to the plan-making system which have been subject to this and other consultations in recent months, are likely to be significant. The ambitions set out in the consultation are cautiously supported however, it is imperative that the government implement them in such a way that the process is genuinely streamlined for the Council, and timescales remain realistic given the current national climate of resource and skills shortages.
- 4.20 To achieve the governments ambitions set out in this and other consultations and to be able to undertake other planning policies the Council will need to undertake

a wholesale review of its planning policy resources and processes to support a streamlined plan-making process. This will include the need to ensure that the team have access to new digital technology and the skills to deploy the technology, sufficient resources (staff, budget etc.) to produce a plan within the timescale envisioned and procedures are put in place to allow this to happen (including cross-party sign-off, consultation and procurement processes).

## **5.0 Financial Implications**

5.1 None directly arising from this report.

## **6.0 Corporate Implications**

### **Employment Implications**

6.1 None directly arising from this report.

### **Legal Implications**

6.2 None directly arising from this report.

### **Corporate Plan Implications**

6.3 None directly arising from this report.

### **Risk Impact**

6.4 None directly arising from this report.

## **7.0 Community Impact**

### **Consultation**

7.1 None.

### **Equality and Diversity Impact**

7.2 None directly arising from this report.

### **Social Value Impact**

7.3 The Councils response to this consultation and subsequent influence over changes to the plan-making process has the potential to influence the effectiveness of the Local Plan including the level of engagement with residents and businesses and what and how they can influence the future development within their communities.

### **Environmental Sustainability**

7.4 The Councils response to this consultation and subsequent influence over changes to the plan-making process has the potential to influence the way in which plans are presented in the future. The consultation is proposing a move towards digital technology as the predominant way to prepare and present the Local Plan in the future. This should reduce the level of printing required to be undertaken by the Council and should reduce the level of physical resources utilised.

## **8.0 Conclusions**

- 8.1 The move towards a more streamlined Local Plan process supported by proportionate evidence and standardised requirements would be supported by the Council. However, at the current time the lack of information regarding the National Development Management Policies means that it is hard for the Council to determine if the process could be streamlined or whether the additional requirements would simply add to the burdens of the requirements making them unrealistic.

## **9.0 Background Papers**

Appendix 1: Consultation Questions and proposed Council response.

Consultation Question	Governments Supporting Text	Council Response
<b>Plan Content</b>		
<p><b>Question 1: Do you agree with the core principles for plan content? Do you think there are other principles that could be included?</b></p>	<p>12. Plans play an important role in directing development and providing local communities with certainty over their areas. However, plans prepared under the current system are often lengthy, word-heavy documents, generally made available in PDF format. Moreover, the content of plans can be unclear and hard to understand and navigate.</p> <p>13. Our ambition is that new-style local plans and minerals and waste plans are simpler, shorter and more visual, showing more clearly what is planned in local areas so users can engage more easily. They will focus on locally specific matters, and the development plan, including local plans, neighbourhood plans and other statutory plans, will have more weight in decision making.</p> <p>14. To help achieve this aim, the Levelling Up and Regeneration Bill sets out parameters for the content of a new-style local plan. It requires the local plan to set out the local planning authority's policies for the "amount, type and location of, and timetable for, development" in its area. In addition, plans may include:</p> <ul style="list-style-type: none"> <li>• other policies relating to the use or development of land in the local planning authority's area which are designed to achieve objectives that relate to the particular characteristics or circumstances of their area, any part of the local planning authority's area or one or more specific sites in their area</li> <li>• details of any infrastructure requirements, or requirements for affordable housing, which development over the plan period should meet -design requirements for development that relate to the whole plan area, part of the plan area or for specific sites, that the authority consider should be met in order for planning permission to be granted</li> </ul> <p>15. In addition, each local planning authority must ensure that a map, to be known as a "policies map", is prepared and kept up to date, illustrating the geographical application of the development plan for the authority's area.</p> <p>16. The Levelling Up and Regeneration Bill similarly sets out the parameters for the content of a new style minerals and waste plan, indicating that they too should set out the minerals and waste planning authority's policies for the "amount, type and location of, and timetable for, minerals and waste development" in its area. In addition, minerals and waste plans may include:</p> <ul style="list-style-type: none"> <li>• other policies relating to minerals and waste development in the relevant area which are designed to achieve objectives that relate to the particular characteristics or circumstances of that area, any part of that area or one or more specific sites in that area;</li> <li>• other policies in relation to development other than minerals and waste development, which are designed to secure that minerals and waste development in the relevant area can take place; and</li> <li>• details of any infrastructure requirements to which minerals and waste development would give rise.</li> </ul> <p>17. The Bill establishes an overarching requirement for local plans and minerals and waste plans to be designed to secure that the use and development of land, and minerals and waste development,</p>	<p>Yes, the Council agrees with the Core Principles as set out for plan content. However, these are generic and it's likely that most authorities would stick to these principles in any event. The option to prepare local plans in two parts should be retained, particularly in city region Housing Market Areas where to resolve all of the issues in a single Local Plan would run counter to the government's ambition to speed up the process overall.</p> <p>The Council agrees that policies should be ambitious, but they should also be realistic and focused on what can be delivered within the expected timescales.</p> <p>The Council does not believe that the policies map should be 'kept up-to-date' as this should be a snapshot in time to illustrate the Local Plan and having one updated without the other is likely to cause confusion.</p>

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	<p>in the planning authority's area, contributes to the mitigation of, and adaption to, climate change. 18. The Bill also sets out key matters that planning authorities must have regard to, when preparing plans. These include national development management policies and relevant neighbourhood priorities statements.</p> <p><b>Proposed approach</b></p> <p>19. To support the approach outlined in the Levelling Up and Regeneration Bill, we propose to set out, through policy and supported by guidance, a series of additional core principles around what plans should contain, to ensure plans are focused on the right things and users are able to understand clearly the 'story' of how the planning authority's area will develop, what is needed to ensure development achieves the right outcomes, and how this will contribute positively to good place making and environmental enhancement.</p> <p>20. To achieve this, we propose that plans will need to contain a locally distinct vision which will anchor the plan, provide strategic direction for the underpinning policies and set out measurable outcomes for the plan period (see more detailed proposals at paragraph 25).</p> <p>21. We propose to make it clear in policy that sustainable development should run as a golden thread throughout plans, with growth being directed to suitable locations and supported by required infrastructure and good design.</p> <p>22. We also propose that plans, including minerals and waste plans, should do the following:</p> <ul style="list-style-type: none"> <li>• contain ambitious locally distinctive policies which meet key economic, social, and environmental objectives, linked to the vision;</li> <li>• foster beautiful places and recognise the importance of design, linking to design codes where appropriate; and</li> <li>• set out a detailed approach to monitoring and ongoing review of the plan, for example how key policies and designations are implemented and applied, and the extent to which the plan is meeting the overall vision for the area.</li> </ul> <p>23. Planning authorities should also ensure that a key diagram is created. This should initially represent the spatial strategy, linked to the plan's vision, and evolve to represent the agreed spatial strategy of the draft plan.</p> <p>24. When preparing the policies map, local planning authorities should ensure that emerging and published iterations are digital, interactive and easily accessible by all users. Policies maps should support community and developer engagement, clearly visualising core plan policies, allocations and other aspects of the plan and its spatial components.</p>	
<b>Plan Visions</b>		
<b>Question 2: Do you agree that plans should</b>	25. A core component of plans is a vision, which should set out the main aims and objectives of the plan over the plan period. Visions can be an important means of setting the wider context and detailing the planning authority's key aims and priorities, and to lay the foundations for a plan in a	Yes, the Council agrees that plans should contain a vision.

Consultation Question	Governments Supporting Text	Council Response
<p><b>contain a vision, and with our proposed principles preparing the vision? Do you think there are other principles that could be included?</b></p>	<p>way that can be clearly understood by communities and other stakeholders before they engage with the full detail. However, visions in existing plans often fall short of these principles. They tend to be too long, generic and high level, and do not sufficiently capture the uniqueness of the places they describe or the views of the communities that they serve.</p> <p><b>Proposed approach</b></p> <p>26. Recognising their potential as a tool to give communities a much stronger voice in the plan-making process, we propose to strengthen the role of the vision in new-style local plans, ensuring they are more focused and specific than those prepared for plans in the current system, genuinely shaped by the views of communities on how their place should evolve, and informed by baseline information and inputs from other stakeholders garnered through early participation. We propose to use regulations to require the inclusion of a vision within a local plan, and set out the following principles in policy which authorities would need to have regard to when preparing their vision:</p> <ul style="list-style-type: none"> <li>• the vision should serve as a “golden thread” through the entire local plan, with policies and allocations linking directly to delivering the outcomes set out in the vision;</li> <li>• the vision should set out measurable outcomes for the plan period, underpinned by the planning authority’s evidence base, which are actively monitored following adoption of the plan. This will strengthen the vision to ensure that it is more than just a “wish-list” and is deliverable and able to respond to the key issues that the plan seeks to address; and</li> <li>• the vision should be supported by a key diagram which sets out the vision spatially for the plan area.</li> </ul> <p>27. In addition, we propose to encourage planning authorities to make links more explicitly between the vision and other relevant corporate or thematic strategies produced by other authorities, public bodies and partnerships, to help secure more buy-in for local plans as vehicles of change.</p> <p>28. To help planning authorities prepare visions that are focused and concise, more quickly and easily, we propose to provide a user-tested digital template which can be used by authorities during plan-making. This will indicate what a vision should do and contain. Exemplars will also be provided to illustrate how visions can be used to their full potential.</p> <p>29. We intend for this approach to also apply to minerals and waste plans.</p>	<p>Having a focused and precise vision which could be delivered during the plan period is supported. However, including a requirement for Councils to link to other stakeholders’ visions is not only likely to be resource hungry (and need constant monitoring) but it is unclear what ‘value’ this would add to the Local Plan, this element is not supported. Consultation with stakeholders is their opportunity to feed their corporate vision into the Local Plan and so having this as an additional requirement not only seems to complicate the process for the Authority but it duplicates work and increases the risk of inaccuracies unless kept under constant review.</p>
<p><b>Local Development Management Policies</b></p>		
<p><b>Question 3: Do you agree with the proposed framework for local development management policies?</b></p>	<p>30. The Levelling Up and Regeneration Bill provides for the creation of a suite of National Development Management Policies (NDMPs), which will be consulted on separately. By dealing with nationally important matters, these will enable plans to be more streamlined, and allow plan-makers to focus on matters that are genuinely local. NDMPs will benefit from the same increased weight which will be afforded to local plans (along with the other different parts of the development plan).</p> <p>31. The Bill also allows for local development management (DM) policies to be included in local plans and minerals and waste plans, to guide decisions on applications. These must relate to use or</p>	<p>Without having further detail of the proposed Development Management Policies, it is hard for the Council to comment on whether this could be relied upon as a substitute for more locally distinctive policies. At the current time it is hard to see how any national policy would remove the need for local context and therefore we are unable to support the inference that this would streamline the process.</p>

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	<p>development of land in their area and be designed to achieve objectives that relate to the planning authority's area, whilst not in substance repeating any of the NDMPs.</p> <p>We want to encourage authorities to be more focused in scoping and designing local DM policies. To drive this focus, we propose to set out the following principles in policy:</p> <ul style="list-style-type: none"> <li>• local DM policies should be underpinned by appropriate justification. It is the intention that the justification for this would be scoped by planning authorities and the new gateway assessments can be used as a measure to check the scoping work done by the planning authority as the plan progresses; and</li> <li>• local DM policies should, wherever possible, enable delivery of the plan's vision. This will assist in strengthening the role of the plan's vision and ensure that local standards and policies are well targeted. This may also assist in reducing the amount of additional justification required to justify local DM policies, as the vision itself will need to be linked to the planning authority's evidence base.</li> </ul>	<p>NDMPs would need to be very detailed and specific to ensure that they are robust however, by their very nature they would need to be generic to be applied nationally.</p> <p>In addition, there is concern that the development industry could target their efforts of legal challenge on NDMPs as the outcome would be 'harder hitting' and therefore reliance on NDMPs without local policies, if successfully legally challenged, could leave LPAs vulnerable.</p> <p>The Council suggests that in any government policy should reference 'evidence' rather than simply justification as the two things are intrinsically linked.</p> <p>In terms of process is it the suggestion that all evidence would need to be gathered prior to the drafting of the vision (i.e. before plan-making begins)?</p> <p>Evidence and justification that supports the NDMPs should be made publicly available so that the LPA can rely on it (or justify an alternative approach) if needed.</p>
<b>Templating and digital efficiencies</b>		
<p><b>Question 4: Would templates make it easier for local planning authorities to prepare local plans? Which parts of the local plan would benefit from consistency?</b></p>	<p>33. Plans lack standardisation and consistency. The appearance of plans, the way in which they are structured, the terminology applied and the use of supporting text alongside policies can vary a large amount between authorities. Plans also have different approaches to policies maps, using different systems, colours and symbology.</p> <p>Consequently, it can be challenging for users to navigate and engage with different plans to understand what matters to them, resulting in wasted time and effort; for example, for communities trying to find out about the policies specific to their local area, or planning consultants comparing specific policies or features across different places.</p> <p>34. The introduction of data standards, as provided for in the Levelling Up and Regeneration Bill, will help to ensure that plan data is created and published consistently across all planning authorities. However, we recognise that more could be done to help standardise plans.</p> <p><b>Proposed approach</b></p> <p>35. Through engagement with the sector, we have consistently heard that nationally-defined digital templates would support planning authorities in drafting their plans and doing so within the proposed 30 month timeframe. Therefore, we propose to produce a series of templates, setting out standardised approaches to specific parts of the plan.</p> <p>Our policy is that planning authorities should use these templates to draft and present their plan. For example, these could set out what a plan should contain through a templated contents page, or could suggest approaches to drafting and presenting specific policies.</p>	<p>The Council would cautiously welcome the use of templates providing that they don't simply add another layer of unnecessary requirements to navigate. Templates should be easily adaptable, visually engaging and easy to populate.</p> <p>Standardisation of the policy map should be informed by a cartographer who has a strong understanding of the planning process (i.e. someone who has experience creating policy maps). There should also be in-built flexibility to ensure that styles and themes can be followed by additional policies/designations that might not have been considered in the template (e.g. all 'green infrastructure' policies to be depicted in different legible variations of green on the policies map). Consideration also needs to be given to the fact that different LPAs use different mapping software and so any templates or requirements needs to take this into account.</p> <p>Consideration also needs to be given to templates meeting accessibility standards set out in the Accessibility Regulations.</p>

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	36. We propose to set out in policy an expectation that any templates provided by the government will be used in the preparation of plans. Templates will be designed to provide sufficient flexibility, for example to allow for individual local circumstances and to enable local innovation, whilst ensuring that key standards are met where it really matters.	
<b>Question 5: Do you think templates for new style minerals and waste plans would need to differ from local plans? If so, how?</b>	37. We envisage adopting a similar approach to templating [as above] across both local plans and minerals and waste plans, although we welcome your views on areas you feel this may need to differ.	<p>South Derbyshire District Council is not the minerals and waste authority and so would not be producing a minerals or waste plan for the area.</p> <p>Notwithstanding this, if the government's aim is to ensure that plans can be read easily against each other than it makes sense for a minerals and waste plan to follow certain agreed standards (particularly mapping ones) and for that data to be shared in a way that can be incorporated and applied by the LPA.</p>
<b>The new 30 month plan timeframe</b>		
<b>Question 6: Do you agree with the proposal to set out in policy that planning authorities should adopt their plan, at the latest, 30 months after the plan preparation process begins?</b>	<p>38. Our evidence on local plan progress shows that it takes 7 years, on average, to produce a local plan. In addition, our statistics show that:</p> <ul style="list-style-type: none"> <li>• only approximately 35% of local planning authorities have adopted a local plan in the last 5 years; and</li> <li>• of the 62% that have not adopted a local plan in the last 5 years, only 5% have published a new plan and only 12% have submitted one for examination.</li> </ul> <p>39. Slow progress means local plans are at greater risk of being outdated upon adoption. This creates uncertainty for communities and holds back development where it is needed.</p> <p>40. As a result, <a href="#">we have previously proposed</a> that local plans and minerals and waste plans are to be prepared and adopted within 30 months and reiterated our intention in <a href="#">Levelling Up and Regeneration Bill policy paper</a>, published in May 2022.</p> <p>41. We believe that a 30 month timeframe strikes the appropriate balance between needing plans to be made more quickly and kept up to date more effectively, with a realistic view on what is achievable: there are recent examples of planning authorities making a plan in just over 30 months within the current system, making 30 months all the more realistic as a timeframe across all planning authorities once the reforms are introduced.</p> <p>42. This chapter sets out proposed new elements of regulations and policy to implement a 30 month timeframe for local plans and minerals and waste plans.</p> <p><b>Proposed approach</b></p> <p><b>Scope of key plan-making stages</b></p>	<p>No, the Council considers that the 30-month timescale for plan production is unrealistic.</p> <p>Currently a vast amount of time goes into evidence gathering, analysing evidence and consultation responses, reporting these back to the relevant stakeholders and coordinating an agreed approach. The complexities of plan making in a political environment, joint and cross-boundary working and the administration of plan-making seems to have been entirely overlooked in the timescale.</p> <p>Taking into account the consultation, gateway checks and Examination the Council will be left with little over 12 months to produce a plan.</p> <p>Of the 30-month timescale almost a third of the allotted time will be dedicated to work undertaken by others (i.e. the Planning Inspectorate) with no mandated timescales, thus the LPA is unfairly beholden to others.</p> <p>No allowance for plan change consultation (i.e. 3 months) has been factored in to the diagram included in the consultation documentation and it is expected that in almost every case (as is the case now) some amendments will be required.</p> <p>A month for adoption of the Local Plan is unrealistic given that this needs to coordinate with Council meeting calendars, reports would need to be drafted, signed-off and briefings undertaken in the run up to a Council meeting. In addition, if amendments/ updates were required to be made to the plan or the policies map this can take some time as it needs to be done accurately and is resource hungry. Documents need to be published online a week before the meeting so realistically this only gives three weeks from the end of the Examination to undertake</p>

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	<p>43. In addition to the requirements set out in the LURB, we propose to establish additional requirements in regulations for authorities to prepare plans based on the following key stages and activities:</p> <ul style="list-style-type: none"> <li>• <b>A scoping and early participation stage</b> – including requirements to “notify” the public and stakeholders including statutory bodies and “invite” participation; prepare or update the local plan or minerals and waste timetable; and give a minimum of four months’ notice before they intend to formally commence the 30 month plan preparation timeframe (starting with the first gateway assessment). Participation and evidence gathering required to inform the Strategic Environmental Assessment (and its eventual replacement Environmental Outcomes Reports) also begins in this stage.</li> <li>• <b>Plan visioning and strategy development</b> – including a requirement to undertake visioning about the future of the area and the first formal public consultation on the plan.</li> <li>• <b>Evidence gathering and drafting the plan</b> – including a requirement to undertake the second gateway assessment.</li> <li>• <b>Engagement, proposing changes and submission of the plan</b> – including a requirement for the second public consultation on the plan and undertaking the third gateway assessment.</li> </ul> <p>44. Further details of specific regulations proposed in relation to these activities, for example in relation to consultation or gateway assessments, are set out in the corresponding chapters.</p> <p>45. To avoid an overly prescriptive and inflexible system, we do not intend to set required timings for all stages in regulations. However, we propose to set out in policy that authorities should adopt their plan, at the latest, 30 months after the plan preparation process begins, following commencement of the first gateway assessment.</p> <p>46. We intend to use policy and guidance to establish more detailed expectations about what planning authorities should do at each stage of the process, as summarised in the diagram below and explained more fully in the remainder of this chapter.</p>	<p>these duties. It also assumes that the Members who started the plan or have been involved with the plan are still in position at the end of the plan process. There are also other influencers to the meeting cycles including purdah etc. that may influence the timings of the meeting.</p> <p>‘Early participation’ is not being classed as public consultation despite having to invite participation – it’s unclear what this means, are we simply telling people that we are preparing a plan and that they will need to sign up to the council’s consultation website in order to get further evidence (without actually providing anything to comment on?).</p> <p>The first formal consultation starts before evidence gathering has begun so it’s likely that the second (and last) public consultation will be where proposals have been seen properly for the first time. Therefore, is this like the Reg 19 consultation where all responses are sent to the examiner along with a schedule of proposed changes or are the changes made to the plan prior to submission? The diagram seems to suggest the LPA can make changes to the plan prior to submission without further consultation taking place before examination.</p> <p>There seems to be the assumption that evidence gathering would no longer be an exercise shared between authorities, if it were to be shared (which makes it more effective and cost efficient) this would assume that local plan timescales between authorities would align.</p> <p>Would the Council be able to set the monitoring requirements prior to any formal consultation or are these likely to change?</p> <p>The five-year rolling requirement will mean that planning policy teams will be constantly plan-making which may be the intention but will mean that time for other projects (e.g. Supplementary Plans, assisting with Neighbourhood Planning to the extent that we currently do will be non-existent) given the resources within LPAs at the moment and the capacity to take on additional/other work. Especially when the other government proposals that lean more heavily towards monitoring are implemented.</p> <p>There needs to be more consideration for consultation apathy. Many people don’t understand the process and they don’t want to be constantly consulted. Members of the public often feel that once development proposals/ targets etc have been agreed that’s the end of it and their may be unrest and uncertainty created by constantly reviewed plans.</p>

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<p><b>Question 7: Do you agree that a Project Initiation Document will help define the scope of the plan and be a useful tool throughout the plan making process?</b></p>	<p>47. During this stage planning authorities should define what will be included in the local plan or minerals and waste plan, and what is not within scope. It is an activity that takes place before the 30 month process begins, and is essential to help balance the time and resources available and establish support from elected Members on the main messages that will shape the local plan. Planning authorities will also prepare for the first gateway assessment.</p> <p>48. Whilst we do not propose to place a time-limit on this stage, planning authorities will be required to commence the 30 month process at a certain point. Therefore, guidance will encourage planning authorities to focus on what is necessary for the 30 month process to commence when required and not to undertake work that could be done in parallel with future stages. Project planning will be key, and planning authorities should resource the necessary project management skills so that planning teams can focus on shaping the plan content and engaging with stakeholders.</p> <p>49. To augment the regulations, we propose to set out, in guidance, the following key activities that the planning authority will need to complete during this phase, prior to the commencement of the 30 month plan-making process.</p>	<p>Yes, the Council agrees that a project initiation document (ideally with cross-party political sign-off) would help to define the scope of the plan. For the document to be useful throughout the plan process there should be consideration for amending/refining this document to respond to change (e.g. political, legal etc.).</p> <p>There should be recognition of the resources (and timescale) available to LPAs throughout the process.</p>

Consultation Question	Governments Supporting Text	Council Response
	<p>a. Prepare a Project Initiation Document, using a digital template provided by government, which will form the basis of discussions at the first gateway assessment and will help set out the context, trends and possibilities of the planning authority's area. It should:</p> <ul style="list-style-type: none"> <li>i. define the scope of the local plan (or minerals and waste plan) and identify evidence required to create a sound plan;</li> <li>ii. identify any local issues likely to be relevant to the plan or environmental assessment;</li> <li>iii. set out the project management, governance, risks to delivery and resourcing arrangements; and</li> <li>iv. outline the overall approach to community and stakeholder engagement.</li> </ul> <p>b. Where the proposed 'test and learn' approach facilitates it, consider introducing the Infrastructure Levy and Infrastructure Delivery Strategy, as proposed in the recent <a href="#">technical consultation</a>, which has now closed .</p> <p>50. As we set out, we propose a stronger emphasis on early participation during the initial stages of plan-making. As part of this, planning authorities will need to "notify" and "invite" views on what the plan should contain and feedback on key issues that should be addressed. It will also provide an important opportunity for local authorities to garner the views of communities and key stakeholders on how they would like to be engaged throughout the process.</p> <p>51. The knowledge and experience of all stakeholders will be key to this and in identifying who should be engaged at this stage. The expectation is that planning authorities will be required to invite a range of relevant persons and bodies, which might include communities, statutory bodies and neighbouring authorities, to participate at this stage. However, this might also be supported by informal engagement with elected members and other internal stakeholders within the wider authority, to ensure the plan ties in with the authority's wider corporate strategies. We see the Project Initiation Document as a way to distil the key messages emerging from these early engagement activities.</p> <p>52. Where propose that, where possible, Project Initiation Documents should outline the 'main messages' of this participation to front-load discussions on vision and strategy. The basis of a vision and strategy will begin to emerge which will then be underpinned by evidence and refined throughout the local plan process.</p> <p>53. At the end of this stage, planning authorities should have a clear idea of the level of commitment required to produce the plan and the key themes that will shape it.</p> <p>54. This is the first stage at the beginning of the 30 month timeframe. The purpose of this stage is to: establish the vision, aims and objectives of the local plan or minerals and waste plan, building on the work done at the scoping stage; to confirm the evidence required to support this; and the spatial options and topics to be covered in local policies as part of the plan.</p>	

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	<p>55. In line with the aim to strengthen the role of plan visions outlined, an established vision will influence the spatial options and link to the local policies and sites – the ‘golden thread’ as described above. A vision that is tested, including through the process of environmental assessment, and well established will result in a local plan or minerals and waste plan that can support proposals and initiatives that align with it, and robustly defend itself from proposals that are not.</p> <p>56. The proposed eight-week mandatory consultation window, shown on the diagram above, is important to establishing the vision. It will be the first opportunity for all stakeholders to formally comment on the issues an area is facing and how they may be tackled in the local plan or minerals and waste plan.</p> <p>57. At the end of this stage the planning authority should be confident about the proposed vision, aims and objectives and know what options are available to deliver them.</p> <p><b>Evidence gathering and drafting the plan</b></p> <p>58. This is second stage within the 30 month timeframe in the diagram above and marks the mid-point between scoping and examination with the second gateway assessment.</p> <p>59. We propose to advise in guidance that the aim of this stage is to decide on an appropriate strategy for the local plan or minerals and waste plan, in terms of the spatial options and policies that will best meet the planning authority’s vision, aims and objectives.</p> <p>60. In line with the evidence and the tests of soundness, the evidence base should relate directly to the tests of soundness to keep it proportionate.</p> <p>61. We propose that guidance on this stage of the plan preparation should encourage continuous engagement with Members, in line with the governance arrangements agreed in the Project Implementation Document Plan. Following the second gateway assessment, planning authorities should seek final Member sign-off of the local plan for public consultation.</p> <p><b>Engagement, proposing changes and submission</b></p> <p>62. We intend to set out in guidance that this final stage before the submission of the local plan or minerals and waste plan needs to be as focused as possible. We will expect that issues are resolved with statutory consultees and stakeholders during the mandatory consultation window, with an opportunity to make modifications to the plan prior to the submission. The planning authority should seek Member sign-off of any changes and avoid re-consulting wherever possible prior to the examination.</p> <p><b>Examination and amendments</b></p> <p>63. We intend to set out in guidance that this stage should last a maximum of six months, to move away from the current situation where examinations can potentially last for several years. The new</p>	

Consultation Question	Governments Supporting Text	Council Response
	<p>gateway assessment process will be key to achieving this, by ensuring that any issues with the plan are picked up earlier in the plan-making process and resolved prior to the examination.</p> <p><b>Monitoring and updates</b></p> <p>64. Following adoption of the local plan or minerals and waste plan, planning authorities will be expected to monitor how their plan is performing, to ensure that key objectives are being met and that policies are effective. A proposed detailed monitoring return, which planning authorities would be expected to complete within four years of the plan being adopted, would ensure that updates to plans can be more targeted and focused.</p> <p>65. As <a href="#">previously announced</a>, the existing complex requirement for plans to be reviewed at least once every 5 years and updated as necessary will be replaced by a clearer requirement in regulations for planning authorities to commence an update of their local plans and minerals and waste plans every 5 years. This would not preclude planning authorities from commencing an update sooner. The intention is to encourage a more rolling rhythm of updates to plans wherever possible, ensuring plans and their evidence are routinely kept up to date. Ultimately, this will make plans more effective.</p>	
<b>Digital Plan</b>		
<p><b>Question 8: What information produced during plan-making do you think would most benefit from data standardisation, and/or being openly published?</b></p>	<p>66. Digital technology has transformed and is transforming our everyday lives, it affects how we communicate with one another, how services are delivered and what we expect from services, how we tackle problems - there is so much that we can learn and transfer to planning. Our ambition is to bring planning and plan making into the digital age and transform how things are done for the better; to provide faster, simpler, more accessible plans and policies to deliver better outcomes, informed by up-to-date data and shaped more actively by communities and other stakeholders.</p> <p>67. To address barriers and reveal efficiencies we have already begun to explore: how plans are presented, their format, content, data accessibility, spatial visualisations; the evidence underpinning plans; and how people engage in plans, with the aim of understanding what is most effective and useful for all those interested in planning. This exploration is pointing us towards a helpful pick and mix of tools, techniques, approaches and guidance to meet the varying needs of plan makers and those involved in plan-making, that when applied will bring delivery efficiencies. 'Figure 2: Our Digital Vision' brings together what this might look like.</p> <p>68. We know that the digital transformation of the planning system and plans will evolve rather than happen overnight. This consultation is an important opportunity for us to hear from you about your needs, hopes and fears, and the challenges and opportunities that you see ahead so that we approach this change with ambition but also pragmatism and realism.</p> <p><b>Proposed approach</b></p> <p>69. We have introduced our ambition for a digital planning system that is underpinned by standardised and open planning data in the Levelling Up and Regeneration Bill. To achieve this ambition, we have introduced legislation which will allow us to prescribe a common format based on standardised data across plan-making. Legislating for data standards and publication will help to</p>	<p>Standardisation of data can be useful for plan making however this does create significant additional resource burdens to planning officers (who often lack the skills and knowledge in order to publish this data in the most efficient manner). Many planning authorities do not have a dedicated GIS Officer and utilise unsupported free software (such as QGIS) to prepare plans. Additional skills/resources will be needed in order for South Derbyshire to be able to comply with meeting data standardisation and publication requirements.</p> <p>In addition, there needs to be certainty about the usefulness of the data being prepared. At the current time the Brownfield Land Register is the only dataset that needs to be published by the LPA in a set data standard, this data as far as we're aware, is rarely used and in terms of 'value for money' it takes a disproportionate amount of time for the authority to produce than actually adds value to the work being undertaken by the authority or by others.</p> <p>Any data standards would need to ensure that they were user-friendly for Neighbourhood Planning groups, community groups and members of the public rather than simply designed to be downloaded for data monitoring purposes by businesses and other agencies to avoid the LPA having to duplicate work and produce information in a variety of formats in addition to the standard.</p>

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	<p>ensure that open, standardised data can drive an improved local plans system. In summary, the Bill sets out the following:</p> <ul style="list-style-type: none"> <li>• Clause 79 (processing of planning data) is to ensure that data is consistently processed, while Clause 80 (provision of planning data) ensures planning authorities no longer receive data in inconsistent formats. This will better enable plans to be delivered faster; and</li> <li>• Clause 81 (certain planning data to be made publicly available) will ensure planning data is open, enabling users to freely reuse it. For example, property developers could identify suitable sites for development and the Property Technology sector could focus on services that help increase efficiency and productivity across the planning system.</li> </ul> <p>70. We recognise that standardisation and publication of data can contribute to greater efficiency and transparency in the plan-making process. Therefore, we seek your views on where there is the greatest need for standardisation, challenges around publication and where the best opportunities lie.</p>	
<p><b>Question 9: Do you recognise and agree that these are some of the challenges faced as part of plan preparation which could benefit from digitalisation? Are there any others you would like to add and tell us about?</b></p>	<p>71. To ensure that digital changes are directed at the right areas, it is important that we listen and learn from what is working and what is not working. Through the engagement we have undertaken so far, the following challenges and barriers have been identified as areas where digitalisation could help:</p> <ul style="list-style-type: none"> <li>• lack of clear guidance on how to make plans results in inconsistency and delays</li> <li>• lack of standard formats and terminology makes plans inconsistent, time consuming to develop and hard to use</li> <li>• uncertainty about evidence requirements and fear of challenge at examination drives over production of evidence which is resource intensive and leads to delays</li> <li>• lack of clear communicable timelines and updates prevents users from understanding and getting involved</li> <li>• plans are static and PDF-based meaning they go out of date quickly</li> <li>• poor monitoring and feedback loops make it difficult to understand if the plan and its policies are working well</li> <li>• the majority of people do not engage in plans, or know why and how they can be involved</li> <li>• plans often involve making difficult local decisions but the political nature of local decision making and how it shapes plan content is often not understood</li> </ul>	<p>The Council agrees that these are some of the challenges faced as part of plan preparation, but it is unclear of digitisation could benefit these.</p> <p>It should be recognised that people engage in plan making when proposals directly affect them (i.e. usually in later stages) at which point they are engaging because they object to the proposals. It should also be recognised that some people don't engage (or want to be involved) because they either agree with the proposals or because proposals do not directly affect them.</p> <p>Static plans have their purpose in terms of audit trails and understanding a snapshot in time. It is important to consider resource implications of constant updates and recognise that the narrative can be lost/become confused with ad hoc periodic updates.</p> <p>It would be very difficult to digitise how the political nature of local decision making has shaped the plan content. By doing this it could also act as a barrier to difficult decisions being taken.</p>
<p><b>Question 10: Do you agree with the opportunities identified? Can you tell us about other examples of digital innovation or best practice</b></p>	<p>72. It is important that we learn and build upon the very best digital tools, technologies and innovations and apply and adapt these to support the varying needs, contexts, challenges and opportunities related to all those involved in plan making. We are aware that every planning authority is different both in its planning context, organisational set up and resource. And so it is important that when we look to the future of plans and how digital will improve plan making, that we consider a range of solutions to fit these richly varying needs and circumstances.</p> <p>73. There is lots we can learn from those planning authority leaders and partners that we are working with on our on our planning data platform, PropTech Innovation Fund, Open Digital Planning community and Design Code Pathfinders and best practice that could be applied to help deliver</p>	<p>The Council agrees with the opportunities identified. It is very important to recognise the resource and skills challenges faced by LPAs in implementing new technology or technological changes.</p>

Consultation Question	Governments Supporting Text	Council Response
that should also be considered?	better plans today, as well as tomorrow. These include a mix of emerging tools and products relating to:	
<b>Question 11: What innovations or changes would you like to see prioritised to deliver efficiencies in how plans are prepared and used, both now and in the future?</b>	<ul style="list-style-type: none"> <li>• visualisation of plans, policies and spatial data</li> <li>• templates, checklists and step-by-step guides to provide clarity and efficiencies</li> <li>• standardisation of data for consistency, access and use</li> <li>• dashboards and platforms for transparency and communication</li> <li>• search tools to better access information</li> <li>• automation tools and AI to process and report</li> <li>• the sharing of best practice via case studies and blogs</li> </ul> <p>74. These are just some examples that could help to improve how we approach the development of plan content, share information on timetables, prepare evidence, process responses and monitor delivery.</p>	The Council has no comments to make.
		
<b>The local plan timetable</b>		
<b>Question 12: Do you agree with our proposals on the milestones to</b>	<p>75. In the current system it can be challenging for communities and other stakeholders to understand when a local plan will come forward and when they can get involved. In part, this is due to the existing requirement for local planning authorities to prepare and adopt Local Development Schemes (LDSs), which are typically long, complex and technical documents which are not updated often enough and therefore do not accurately reflect the stage of preparation local planning</p>	<p>There is a significant level of detail that will be an unknown in the first instance (e.g. joint committees etc.) and what will be included in a supplementary plan. This is a process that evolves and is responsive to political timescales and therefore the timetable should be adaptable and be able to incorporate unknowns.</p>

Consultation Question	Governments Supporting Text	Council Response
<p><b>be reported on in the local plan timetable and minerals and waste timetable, and our proposals surrounding when timetables must be updated?</b></p>	<p>authorities are at. This situation is the same for Minerals and Waste Development Schemes (MWDS) which County Councils are required to produce for their local plans relating to minerals and waste.</p> <p>76. The Levelling Up and Regeneration Bill sets out that the local plan timetable must include:</p> <ul style="list-style-type: none"> <li>• the matters the local plan is seeking to address</li> <li>• the geographical area of the local plan</li> <li>• what (if any) supplementary plans the local planning authority is looking to prepare, as well as the subject matter and geographical area or sites these supplementary plans relate to</li> <li>• how the authority seeks to implement its authority-wide design code</li> <li>• details of joint plan-making (including any joint committees), where relevant (including for supplementary plans)</li> <li>• a timetable for the preparation of the local planning authority’s local plan and any supplementary plans they are seeking to prepare</li> </ul>	<p>The requirement for 6 monthly updates in this context is very frequent given the likely need for formal sign-off (and the timescales that this involves).</p> <p>The Council disagrees with the 6 monthly update to the timetable and proposes that the timescales should be updated when the milestones are met (rather than at fixed points in time).</p>
<p><b>Question 13: Are there any key milestones that you think should automatically trigger a review of the local plan timetable and/or minerals and waste plan timetable?</b></p>	<p>77. The requirements as to the contents of minerals and waste plan timetables mirror those for local plan timetables, with the exception of the requirements relating to preparing an area wide design code and whether there is agreement to establish a joint committee. If the local planning authority is also the minerals and waste planning authority, the local plan timetable may itself incorporate the authority’s minerals and waste plan timetable.</p> <p>78. As now, the process of environmental assessment will continue to run alongside the process of plan preparation.</p> <p><b>Proposed approach</b></p> <p>79. In addition to what is set out in the Bill, we propose to require planning authorities to prepare their proposed timetable consistently, reporting against the same milestones in the same way, with an expectation that they do so in a manner that is consistent with the 30 month timeframe. We are therefore proposing that all planning authorities report on when they expect to meet the following milestones (by making this information available to the public):</p> <ul style="list-style-type: none"> <li>• commencement of Gateway 1</li> <li>• first mandatory consultation window (8 weeks)</li> <li>• commencement of Gateway 2</li> <li>• second mandatory consultation window (6 weeks)</li> <li>• commencement of Gateway 3</li> <li>• submission for independent Examination</li> <li>• anticipated adoption date</li> </ul> <p>80. The Bill replaces the existing requirement to adopt an LDS with a new, simpler requirement to prepare and maintain a local plan timetable. We intend to use regulations to bring about a shift from a document-based requirement to one that will make the relevant data publicly available in a</p>	<p>The Council disagrees with the 6 monthly update to the timetable and proposes that the timescales should be updated when the milestones are met (rather than at fixed points in time).</p> <p>It is for the Council to determine the level of sign-off required at each stage of plan making.</p> <p>The frequency of the update and the fact that work had to be duplicated to provide it in two different formats adds to the resource burden placed on the Council.</p>

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	<p>prescribed digital format. An equivalent requirement for a minerals and waste timetable will also be introduced.</p> <p>81. Planning authorities will no longer need to go through full Council sign-off each time their local plan timetable or minerals and waste plan timetable is revised. Instead, they will be required to make available key information about the future shape of local plans, supplementary plans and minerals waste plans and the timeline for their preparation in a simple, consistent format and structure, and keep this up to date. This will ensure that key information is available consistently and streamline the preparation and update process for authorities.</p> <p>82. We also propose to set out in regulations a requirement for planning authorities to revise their timetable at least once every six months, or earlier upon reaching a key milestone in the preparation of the plan, or if deemed appropriate, in order to ensure they are updated more regularly and the information they contain is more reliable. We propose to set out in guidance an expectation that planning authorities should put in place the governance and delegation arrangements needed to enable this to happen. This may include seeking appropriate delegated powers for officers to update timetables or putting in place arrangements for accelerated sign-off of changes by members.</p> <p>83. We are also considering how planning authorities should prepare the local plan timetable and minerals and waste plan timetable and make it available, to ensure information is available consistently and in a format that everyone is able to understand. Our initial proposal is to set out in regulations:</p> <ul style="list-style-type: none"> <li>• that planning authorities must use digital templates and data standards, as prescribed by government, in preparing their local plan and minerals and waste plan timetables. These would be mandatory, to ensure that they are to be delivered in a consistent way; for example, using standardised date formats, or adopting consistent conventions for key plan preparation milestones; and</li> <li>• that planning authorities should publish and maintain the timetable on their website in two forms: a plain-English, tabular form, aimed primarily at the public; and as a dataset, to enable public and private sector innovation and support better monitoring of the “national picture”.</li> </ul>	
<b>Evidence and the tests of soundness</b>		
<p><b>Question 14: Do you think this direction of travel for national policy and guidance set out in this chapter would provide more clarity on what evidence is expected? Are there other</b></p>	<p>84. The amount of evidence produced to support a local plan or minerals and waste plan takes a significant amount of time and resource to produce and can often feel disproportionate. As part of wider measures, we have therefore been considering the requirements and approach to developing the evidence base which supports plans. Ensuring that evidence is proportionate is a key component in meeting our ambitions for a 30 month end-to-end plan-making timeframe, as well as allowing planners to focus on activities such as community engagement.</p> <p>85. However, a strong evidence base will still be expected to inform and support plans. Evidence will remain an important part of plan-making and monitoring, allowing planning authorities to develop robust and effective plans and allowing communities and other stakeholders to understand the decisions that have been made. We are mindful of the need to ensure that reforms to evidence</p>	<p>The Council agrees with the direction of travel but provide a comprehensive response until more detail is provided.</p> <p>Evidence requirements should be explicit not just on what evidence is required but what that evidence should assess and how.</p> <p>There also needs to be consideration of the fact that evidence, when taken as a whole, informs the plan making process and so whilst distinction regarding which evidence can be challenged may be useful there needs to be recognition that it may still be useful (rather than supplementary).</p>

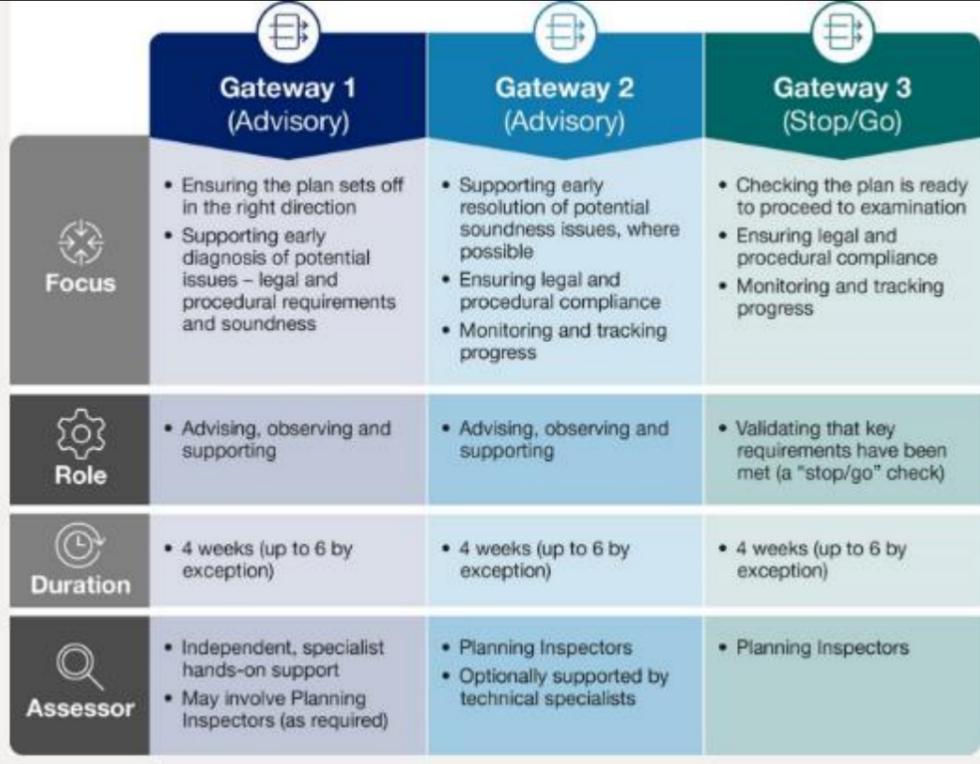
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<p><b>changes you would like to see?</b></p>	<p>improve and do not undermine the quality or effectiveness of policies or plans, or the decision-making that relies on them.</p> <p><b>Proposed approach</b></p> <p>86. We are considering a number of changes which, taken together, will reduce the amount of evidence required to develop a plan and defend it at examination, but still ensure high quality plans are delivered. These changes are summarised in the diagram below, and explained in more detail in the remainder of this chapter.</p>  <p><b>Changes to national policy and guidance</b></p> <p>87. We have already proposed (through the <a href="#">consultation on reforms to the National Planning Policy Framework</a> launched in December 2022) amending the tests of soundness against which plans are examined, removing the 'justified' test. Although planning authorities would still need to produce evidence to inform and explain their plan against the remaining tests of soundness, and to satisfy requirements for environmental assessment, removing the explicit test that plans are 'justified' is intended to allow a proportionate approach to their examination in light of these other evidential requirements. We are currently analysing the responses to the consultation and a decision on whether to implement this proposal will be confirmed when the Framework is updated in due course.</p> <p>88. We have heard from planning authorities and the wider sector that more clarity on what evidence is expected and what 'proportionate' evidence looks like would help to address some of the issues set out in paragraph 84. Clearer expectations should not mean more work for planning authorities in order to meet those expectations; on the contrary, it should allow them to have greater confidence that their evidence base is appropriate and that 'overproduction' of evidence does not take place.</p>	<p>The Council agrees that the 'effective' element of the test of soundness is one that is focused on at Examination, there should be sufficient confidence that delivery will happen but similarly there needs to be a balance for landowners and developers with allocations in a plan where they may not have frontloaded extensive delivery work due to the uncertainty of not yet being allocated. At the time of allocation delivery is likely to be based on a number of assumptions and it should be recognised that this is appropriate.</p>

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	<p>89. We are therefore exploring the direction of travel set out below. It should be noted that the majority of these changes would be brought forward through the next review of the National Planning Policy Framework, and so there will be an opportunity to comment on detailed proposals at that stage.</p> <ul style="list-style-type: none"> <li>• Setting clearer evidence expectations through national policy. This would make it easier for planning authorities to understand what to produce, and to be more confident that their evidence base is proportionate and able to demonstrate the soundness of the plan.</li> <li>• Amending national policy to make a distinction between evidence produced and submitted to demonstrate that the plan is sound and legally compliant, and information gathering, assessment and other plan-making activities which are used to inform the plan but are not related to soundness or legal compliance. The rationale for doing this would be to help focus discussion at the examination. This change is related to a proposed change to the regulations which prescribe what documents or information are provided alongside the plan submitted to examination.</li> <li>• Clarifying in national policy that evidence should only normally be discussed and argued against at examination where there is a significant and demonstrable reason for doing so, in relation to the tests of soundness and legal requirements. This would be intended to provide more certainty to all stakeholders on the types of issues that might come up at examination, and to ensure planning authorities do not feel they need to over-produce evidence in order to manage risks. Note, this would not impact the right to be heard at examination, and would not affect the ability to legally challenge the plan.</li> <li>• Providing clearer guidance to support the existing national policy that a plan should represent an appropriate strategy for the area, but that planning authorities do not need to demonstrate it is the most appropriate strategy. This would reflect a previous change made to the NPPF in 2018, and clarify what this means for evidence expectations.</li> <li>• Providing additional overarching guidance on ‘what good evidence looks like’. This could include guidance on: <ul style="list-style-type: none"> <li>• what ‘proportionate’ and ‘adequate’ looks like;</li> <li>• what constitutes up-to-date and how evidence should be updated;</li> <li>• how evidence should be communicated (including the use of non-technical summaries) and published; and</li> <li>• how data inputs should be referenced, and how data outputs should be shared and produced on a consistent basis to be able to be re-used for other purposes.</li> </ul> </li> </ul> <p>90. We are also proposing that planning authorities to complete a new, light touch and templated ‘statement of compliance with legislation and national policy’ – which would set out where in the suite of evidence each national policy has been considered, acting as a signposting document. The benefit of this would be that, combined with greater definition in the NPPF, it would become far clearer what is expected to be consistent with national policy, and that this expectation has been met (or why it has not). Some planning authorities already produce similar documents of their own to support examination of their plans, and the intention would not be to set a material additional burden – instead, it would reduce some of the need for topic papers and similar documents currently prepared.</p>	

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	<p>91. We also understand there are various views in the planning sector about the ‘effective’ element of the tests of soundness, in particular the extent to which deliverability over the plan period must be demonstrated through evidence. We intend to undertake work to explore whether a change to this test of soundness would be beneficial, balancing the need to ensure there is sufficient confidence that planned development will come forward.</p>	
<p><b>Question 16: Do you support the freezing of data or evidence at certain points of the process? If so which approach(es) do you favour?</b></p>	<p>92. We are currently undertaking work to standardise elements of the evidence base that are particularly complex. Previous engagement with the sector has indicated that standardisation of evidence would help provide greater clarity on what is expected and reduce discussions around specific methodologies at examination.</p> <p>93. Standardisation also presents opportunities to make better use of data and digital processes and tools. More readily available data will help planning authorities create a consistent and quality baseline of evidence.</p> <p>94. Standardisation could be a more detailed level of guidance, through to standard methodologies, or even tools developed to support planning authorities to produce evidence. The precise type of standardisation is likely to vary by evidence topic.</p> <p>95. The topics that might benefit from standardisation and/or more readily available baseline data include: development need (for example, documents currently produced such as economic development needs assessments); sites identification, assessment and selection (for example, housing and employment land availability assessments); and impact assessments (for example, transport assessments).</p> <p>96. More broadly, our reforms to the processes of environmental assessment also seek to strengthen monitoring processes so that we can better capture data for future reuse, and the new requirement to prepare Infrastructure Delivery Strategies will enable a more unified approach to identifying the infrastructure that is required to support growth.</p> <p><b>Freezing of data or evidence</b></p> <p>97. We think there is a case for ‘freezing’ data or evidence at certain points in the plan-making process – with the aim to reduce iteration and delay, as well as the resources required to update. This expectation would be established through national policy or guidance rather than regulations, and Inspectors at examination would still be able to request up-to-date evidence if needed to properly assess soundness. There are different ways in which freezing might work:</p> <ul style="list-style-type: none"> <li>• freezing of input data – for example, no longer being expected to incorporate or re-consider regularly released data each time they are released, unless the planning authority feels there is an overwhelming reason for doing so. This would reduce iteration in the overall process and provide certainty around the development being planned for as the plan is progressed. This could relate to only certain evidence topics or documents, or to only certain types of data;</li> <li>• agreeing the scope of evidence (or certain evidence documents) or the methodology followed earlier in the process, which is then not changed or only changed under limited prescribed circumstances. This might be done through gateway assessments. It is</li> </ul>	<p>The Council would support the standardisation of data and the freezing of it at certain points however, there needs to be consideration of the availability of the data and the frequency of data change.</p> <p>Where data is being standardised / reported there should also be the ability to record the source of the data and the date of collection. It would also be useful for there to be a clear distinction between factual data and judgement data.</p> <p>It would be difficult for site selection to be standardised as there are numerous factors that feed into which sites are selected for development and a variety of reasons. Whilst most site selection methodologies follow similar formats there are often local circumstances or priorities that dictate the direction of growth or sites selected.</p> <p>Freezing the data at time of publication is fine but if more evidence is submitted by others or the Inspector requests more evidence (from others) this should not preclude the LPA from submitting further evidence.</p>

Consultation Question	Governments Supporting Text	Council Response
	<p>important to note, however, that examinations will retain primacy – gateway assessments cannot act as quasi-inquiries and so will not ‘examine’ or sign off evidence per se; and</p> <ul style="list-style-type: none"> <li>freezing of the evidence at the point of publication of the plan and submission to the Inspector. This would mean setting an expectation that new evidence would not normally be required to be submitted to support examination. As stated above it would not, however, preclude the Inspector from requesting additional evidence if they felt it was necessary – and, indeed, this could be done through the examination pause.</li> </ul> <p>98. Freezing of data and evidence is also related to the move to greater standardisation of evidence requirements and approaches, as set out above. For example, methodologies could set out the circumstances under which data or evidence should be revisited.</p>	
<p><b>Question 17: Do you support this proposal to require local planning authorities to submit only supporting documents that are related to the soundness of the plan?</b></p>	<p>99. To support the direction of travel set out above, we are proposing to amend the requirement for the submission and publication of evidence set under secondary legislation. Currently local planning authorities are required to submit ‘such supporting documents as in the opinion of the local planning authority are relevant to the preparation of the local plan’. When implementing the plan-making reforms, we are proposing a requirement to submit only such supporting documents as the planning authority considers strictly necessary to show whether the plan is sound. This would also apply to minerals and waste plans.</p> <p>100. Combined with clearer guidance on what evidence is required, and a distinction made between evidence to support the examination and wider plan-making activities, we believe that fewer evidence base documents will be required to be submitted and therefore formally considered at examination. It should be noted that this would not prevent planning authorities choosing to publish wider materials to help to explain decisions taken. It would also not preclude the Inspector from requesting additional evidence at examination if they felt it was necessary. The gateway assessments process might also make recommendations on evidence required to demonstrate soundness.</p>	<p>The Council would support this approach. Combined with clear guidance on what evidence is required.</p> <p>Where further evidence is requested, and this goes beyond that required by guidance the 30-month ‘clock’ should stop to allow the LPA to prepare this information.</p>
<p><b>Gateway assessments during plan-making</b></p>		
<p><b>Question 18: Do you agree that these should be the overarching purposes of gateway assessments? Are there other purposes we should consider alongside those set out above?</b></p>	<p>101. A challenge in the current system is the number of local plans, including those for minerals and waste, that are submitted for independent examination in public with deficiencies. At best, this results in delays during examinations, but may also result in plans failing late in the preparation process. This can be frustrating for all of those with an interest in the plan, wasting resources and leaving authorities more vulnerable to speculative development. While local planning authorities may take up advisory visits through the Planning Inspectorate, these are only optional and often take place too late in the process to be able to genuinely resolve issues.</p> <p>102. The Levelling Up and Regeneration Bill requires authorities to seek observations and advice from a person appointed by the Secretary of State at times which will be prescribed in regulations. We intend to use these provisions to introduce mandatory gateway assessments (‘gateways’) into the new local plan process, to ensure a more supportive approach to plan-making, and provide greater visibility to key stakeholders and the wider community about how their local plan is progressing. This provision also applies to the preparation of minerals and waste plans.</p> <p><b>Proposed approach</b></p>	<p>The Council supports the inclusion of gateway assessments to ensure that they are proceeding along the right lines. These should however ‘stop the clock’ in terms of timescale for plan production. They should also be bespoke checks designed to assist the authority.</p> <p>The gateway checks should be a two-way process which allows the LPA to ask questions of the Planning inspectorate and not simply a ‘box tick’ exercise in terms of meeting standardised requirements.</p> <p>It would also be useful if the gateway checks, having the context of the Local Plan, can consider the LPAs proposed timescales and suggest potential amendments to the timescales based on the issues that the Council is facing. This would help where the LPAs timescale may not align with another authorities timescale and/or issues do not look like they can be resolved in advance of Examination.</p> <p>The government should be clear about what happens if gateway checks aren’t passed. Gateway check 3 is a stop/go – what happens at this</p>

Consultation Question	Governments Supporting Text	Council Response
	<p><b>Purpose of the gateway assessments</b></p> <p>103. We think the overarching purposes of the gateways should be:</p> <ul style="list-style-type: none"> <li>• <b>ensuring the plan sets off in the right direction</b> – that the planning authority has the right tools and resources to deliver, that the scope of the plan and associated supporting information and evidence is appropriate, and that key risks are identified with suitable mitigation proposed</li> <li>• <b>ensuring compliance with legal and procedural requirements and (wherever possible) supporting early resolution of potential soundness issues</b> – that the plan has met all the necessary legal and procedural requirements to progress to examination in public, and as far as is possible prior to examination that potential soundness issues have been addressed; there would be a focus on resolving key issues or blockers, wherever possible</li> <li>• <b>to monitor and track progress</b> – that the planning authority is having regard to the observations and advice provided through the gateways, and that the plan is on track against its timetable, and communities and other interested parties have information about how plans are progressing</li> </ul>	<p>point if the outcome is stop? Additional time should be allocated to the LPA where gateway checks have resulted in further work.</p> <p>In addition, the likelihood is that during the gateway checks the authority is (particularly the third one) the authority is unable to progress with local plan making as it would be dependent on the outcome. The 'clock' should stop whilst these checks happen.</p> <p>There is also concern regarding potential conflict between Inspector advice during the gateway checks due to a lack of consistency between Inspectors at each stage. Inspectors should be experienced and it is noted that these are currently in short supply. A lack of availability of experienced Inspectors should not cause delays to the LPA or impact on the quality of the advice that is being given.</p>
<p><b>Question 19: Do you agree with these proposals around the frequency and timing of gateways and who is responsible?</b></p>	<p>104. We propose to introduce, via regulations, a requirement for planning authorities to undertake 3 gateways:</p> <ol style="list-style-type: none"> <li>1. at the very beginning of the 30 month process, following work undertaken at the scoping stage</li> <li>2. part-way through plan preparation (between the two mandatory consultation windows)</li> <li>3. at the end of the plan-preparation process (following the second mandatory consultation window), at the point the local planning authority intends to submit the plan for independent examination in public</li> </ol>	<p>No, planning inspectors should be involved at every check (not 'as required' in check 1).</p> <p>If an issue isn't picked up until gateway 2 as a result of a lack of involvement by the Planning Inspectorate this would have significant timescale issues as half of the 30-month time would have already elapsed and of the remaining time (15 months) 8 months would already have been allotted to the final gateway check, the Examination and adoption – leaving only 7 months to rectify any issues.</p> <p>It's unclear what happens at the third gateway if it results in a 'stop'. No allowance for this has been factored into the timescale.</p> <p>There may be situations where issues can't be resolved between stakeholders prior to submission, and this should not hold up the plan-making process. The Council should be required to demonstrate that they have tried to resolve issues but having a fixed expectation that this will be done could mean that a consultee could effectively hold an LPA to ransom as the Council will need to concede to meet the fixed timeframe.</p>

Consultation Question	Governments Supporting Text	Council Response																				
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The role of the first and second gateways will be advisory, and the appointed person will have no power to halt or delay the plan preparation process. However, planning authorities will be required to have regard to their observations and advice in preparing their plan.</p> <p>106. The third gateway will have a binding role, as planning authorities will be required to submit their draft local plan or minerals and waste plan for examination where the appointed person has advised that the prescribed requirements are met. We propose that such requirements would be focused on legal and procedural requirements, for example those set out in Part 2 of the Planning and Compulsory Purchase Act 2004 (as modified by the Levelling Up and Regeneration Bill), in regulations, or relevant environmental legislation applying to plans.</p> <p>107. We propose that issues related to the soundness tests, set out in the NPPF, may be flagged by the assessor at this stage, but would need to be considered further and resolved as part of the examination in public, to ensure the views of other parties are taken into account when reaching a decision. Where requirements are not met, we intend that planning authorities will be able to repeat the third gateway assessment.</p> <p>108. We propose to define in regulations when planning authorities must undertake gateways, tied to key stages of the overall plan preparation process rather than precise timeframes. More detail about appropriate timings will be set out in guidance. We also propose that authorities should set out when they intend to commence a gateway in their local plan timetable and notify the relevant parties a minimum of four weeks prior to commencement.</p>		Gateway 1 (Advisory)	Gateway 2 (Advisory)	Gateway 3 (Stop/Go)	Focus	<ul style="list-style-type: none"> <li>Ensuring the plan sets off in the right direction</li> <li>Supporting early diagnosis of potential issues – legal and procedural requirements and soundness</li> </ul>	<ul style="list-style-type: none"> <li>Supporting early resolution of potential soundness issues, where possible</li> <li>Ensuring legal and procedural compliance</li> <li>Monitoring and tracking progress</li> </ul>	<ul style="list-style-type: none"> <li>Checking the plan is ready to proceed to examination</li> <li>Ensuring legal and procedural compliance</li> <li>Monitoring and tracking progress</li> </ul>	Role	<ul style="list-style-type: none"> <li>Advising, observing and supporting</li> </ul>	<ul style="list-style-type: none"> <li>Advising, observing and supporting</li> </ul>	<ul style="list-style-type: none"> <li>Validating that key requirements have been met (a "stop/go" check)</li> </ul>	Duration	<ul style="list-style-type: none"> <li>4 weeks (up to 6 by exception)</li> </ul>	<ul style="list-style-type: none"> <li>4 weeks (up to 6 by exception)</li> </ul>	<ul style="list-style-type: none"> <li>4 weeks (up to 6 by exception)</li> </ul>	Assessor	<ul style="list-style-type: none"> <li>Independent, specialist hands-on support</li> <li>May involve Planning Inspectors (as required)</li> </ul>	<ul style="list-style-type: none"> <li>Planning Inspectors</li> <li>Optionally supported by technical specialists</li> </ul>	<ul style="list-style-type: none"> <li>Planning Inspectors</li> </ul>	
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	<p>109. We think that each gateway should ordinarily last no more than four weeks (up to 6 weeks in exceptional circumstances). In order to maintain a degree of flexibility around how gateways are introduced, we do not propose to define this maximum timeframe in regulations, but will work closely with delivery partners to ensure it is consistently achieved. We also propose to set out, in guidance, that authorities should not pause work during gateways and that plan preparation work should continue in parallel.</p> <p>110. To ensure gateways checks are carried out consistently and provide quality outputs that support authorities, we propose that there should be a 'gatekeeper' organisation that manages the end-to-end gateways process, including appointments on behalf of the Secretary of State.</p> <p>111. By default, we expect that planning Inspectors will routinely conduct gateway assessments (and would always do so at the third gateway). However, we do not think this should preclude the Secretary of State appointing alternative or additional assessors to support the gateway assessment process, where this can provide appropriate tailored advice. For example, more hands-on support will likely be needed to support the first gateway to ensure the plan sets off in the right direction, and in some instances independent technical advice may be required at the second gateway dependent on the specific issues identified by the authority or assessor.</p>	
<p><b>Question 20: Do you agree with our proposals for the gateway assessment process, and the scope of the key topics? Are there any other topics we should consider?</b></p>	<p>112. In order to be successful, we believe that there needs to be flexibility in how the different gateways are delivered. Further work is planned to develop a detailed working model for gateways, however our initial proposals are as follows:</p> <ul style="list-style-type: none"> <li>• prior to each gateway, the planning authority will prepare a short report detailing progress against a series of key topics. This report will take the form of a digital template, provided by government, to ensure a consistent and efficient approach but may be accompanied by other cross-referenced materials to support the authority's position.</li> <li>• At the first and second gateways, it is expected that the authority will be asked to identify up to five issues which pose risks to the soundness and/or legal or procedural compliance of the plan; at the third gateway, we envisage authorities would be required to complete a 'statement of compliance with legislation and national policy' template.</li> <li>• the report and accompanying materials will be submitted to the 'gatekeeper' by the planning authority, marking the formal commencement of the gateway;</li> <li>• a person (or persons) will be appointed to undertake the gateway assessment as soon as possible. They will be responsible for reviewing the planning authority's report (and accompanying materials, as deemed necessary), and may identify other issues beyond those set out by the authority;</li> <li>• during the first and second gateways, an interactive workshop day will be planned and executed by the appointed person(s) to work through the issues identified and provide initial observations and advice to the planning authority. This is unlikely to be necessary for the third gateways, with any clarifications to be dealt with via written correspondence between the appointed person(s) and the planning authority; and</li> <li>• a short report setting out observations relating to progress against key requirements and advice in relation to issues will be prepared by the appointed person(s) and shared with the planning authority. This will mark the formal end of the gateway and, as per the requirement in the Levelling Up and Regeneration Bill, planning authorities must publish</li> </ul>	<p>The Council agrees with the proposed process.</p> <p>The interactive workshop day should involve discussions with a number of different Council stakeholders including appropriate Member representation and planning officers. There should also be the opportunity to speak with each of these stakeholders independently to ensure that all/any issues can be teased out at the earliest possible opportunity.</p> <p>Given that the report is expected to be made public there will need to be consideration to how authorities can provide sensitive information (potentially surrounding political or stakeholder issues) which could impact on plan production in an open and honest manner without worry of details being made public. Without this assurance LPAs will not be able to make best use of the checks and may need to without key information.</p>

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	<p>this report publicly as soon as is reasonably practicable. We propose that an end of gateway report digital template will be provided to planning authorities by government to populate at this step of the process.</p> <p>113. We propose that the following key topics would be explored through each gateway:</p> <p><b>Table 1: Gateway assessments topics</b></p> <p><b>Gateway 1</b></p> <ul style="list-style-type: none"> <li>• Review of the Project Initiation Document (as proposed in <a href="#">Chapter 2</a>), including: <ul style="list-style-type: none"> <li>• Proposed scope of the plan and identifying the evidence required to create a sound plan</li> <li>• Project management, governance, risks to delivery and resourcing to deliver against the local plan timetable</li> <li>• The overall approach to engagement with communities and stakeholders, including statutory bodies throughout the plan preparation process</li> </ul> </li> <li>• Data and digital approach</li> <li>• Early scoping of relevant SEA (and subsequently EOR) requirements</li> <li>• Scoping out topics where local specific development management policies may be required.</li> <li>• Headline position on delivering new homes based on the standard method and recent Housing Delivery Test (HDT) results and, where possible, describe the high-level options available to deliver development needs in the area.</li> <li>• Headline positions on how plan with reflect any relevant Local Nature Recovery Strategy</li> </ul>	
	<p><b>Gateway 2</b></p> <ul style="list-style-type: none"> <li>• Progress against Project Initiation Document and programme</li> <li>• Progress against observations or advice received at Gateway 1</li> <li>• Topic-specific advice based on planning authority and appointed person identified issues (around emerging plan and evidence)</li> <li>• Data and digital requirements (including policies map)</li> <li>• Progress with relevant SEA (and subsequently EOR) requirements</li> <li>• Engagement with communities and statutory bodies</li> <li>• Compliance with the requirement to have regard to certain matters, including any relevant Neighbourhood Priorities Statements</li> </ul>	

Consultation Question	Governments Supporting Text	Council Response
	<p><b>Gateway 3</b></p> <ul style="list-style-type: none"> <li>• Procedural and legal requirements met</li> <li>• Regard had to observations and advice at Gateways 1 and 2</li> <li>• Evidence prepared as proposed and any previously identified gaps addressed</li> <li>• Relevant SEA (and subsequently EOR) published, including explanation of compliance with national requirements</li> <li>• Summary of representations available</li> <li>• Digital and data requirements met (including policies map)</li> <li>• Nationally defined templates used, where appropriate</li> <li>• Engagement activities undertaken in line with Project Initiation Document with regard to national guidance</li> <li>• SDS general conformity statement prepared (where relevant)</li> <li>• Practical readiness for examination (e.g. venue identified for hearings etc.)</li> </ul>	
	<p>114. To mitigate any risk of unfairness and ensure the gateways can operate at pace, we propose that other interested parties should not be invited to participate in workshops or contribute to reports. However, under the provisions within the Levelling Up and Regeneration Bill, planning authorities must publish the final report as soon as is reasonably practicable and it is expected that the report will detail where the involvement of third parties will be required to resolve issues, acting as a key 'sign-posting' document for those with an interest in the plan.</p>	
<p><b>Question 21: Do you agree with our proposal to charge planning authorities for gateway assessments?</b></p>	<p>115. While existing advisory visits are provided by PINS free of charge to planning authorities, given gateways will be mandatory for all authorities there is a need to put them on a sustainable financial footing, to ensure delivery of a quality and consistent approach. We therefore propose that gateways are fully funded through cost recovery from the planning authority, with a standard fee for each gateway defined in regulations. We will develop this in close partnership with the Planning Inspectorate and taking into consideration wider sectoral views.</p>	<p>No, the Council disagrees that they should have to fund the cost of a service that they are mandated to use. This could open the door to charging inflated prices (as the Council has no other alternative option). Where a requirement has been introduced by the government this should be fully funded by the government.</p> <p>Given that this is intended to reduce the time needed at Examination it should be considered as part of the Examination process. The Examination process is currently government funded and it's unclear why this aspect of the examination should now be funded by the LPA, especially given that presumably the government will be making cost-savings because of the shorter Examinations that are expected to result.</p> <p>Notwithstanding the above, if fees are charged then service level agreements should be provided by PINS that are consistent with the service provided elsewhere, clear, and transparent. There would also</p>

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		<p>need to be a mechanism for compensation where expected service targets are not met.</p> <p>It is unclear why wider sectoral views be considered then determining the fee? This should be based on the cost of providing the service.</p>
<b>Plan examination</b>		
<p><b>Question 22: Do you agree with our proposals to speed up plan examinations? Are there additional changes that we should be considering to enable faster examinations?</b></p>	<p>116. Examination is a critical part of the plan preparation process, and will remain so in the reformed plan-making system. An examination in public by an independent Inspector provides assurance that the local plan or minerals and waste plan is 'sound'. It provides a critical chance for scrutiny and a further opportunity for those with an interest in a plan, including communities, to have their say, with the existing "right to be heard" retained.</p> <p>117. We believe that the overall examination process, in its current form, broadly continues to provide a good basis for testing local plans and minerals and waste plans, and for interested parties to have their say. However, we also recognise that examinations frequently take too long, in extreme cases lasting several years. This does not align with the government's aim for plans to be prepared and adopted in 30 months. It can result in development being held up and leave planning authorities more vulnerable to speculative applications for development, creating uncertainty for communities.</p> <p><b>Proposed approach</b></p> <p><b>Speeding up examinations</b></p> <p>118. We are proposing that examinations of local plans and minerals and waste plans should take no longer than six months; if a consultation on proposed modifications to the plan is needed, this should add no more than three months to the overall examination process in addition. Recognising that some plans can deal with particularly contentious or complex matters and can cover significant geographies (potentially involving several planning authorities), we do not intend to prescribe these timeframes in regulations.</p> <p>119. We are working closely with the Planning Inspectorate to ensure that these timeframes are routinely adhered to, exploring further opportunities to make examinations faster and more efficient. Most changes would be delivered through changes to the Inspectorate's procedural guidance on local plan examination. The emerging proposals include:</p> <ul style="list-style-type: none"> <li>• appointing an Inspector when the planning authority commences the third gateway assessment, to reduce delays at the beginning of the examination process</li> <li>• using panels of two or more Inspectors by default, to allow for more parallel working and increase efficiency at key stages of the process;</li> <li>• revising the way the Matters, Issues and Questions (MIQs) stage of the process works, so that only the relevant planning authority is invited to submit responses. MIQs are usually shaped by representations from third parties, and as those third parties will have a further opportunity to speak at the hearings, their involvement at this stage could be considered unnecessary. We also propose that the MIQs stage is focused on questions that relate directly to the soundness of the plan. Taken together, these proposals should result in a</li> </ul>	<p>The Council cautiously agrees however more detail on how this would work in practice needs to be provided.</p> <p>The Council believes that the 30-month clock should stop during Examination as this is largely out of the control of the LPA. Particularly if timescales for examination in Regulation will not be prescribed for the Planning Inspectorate. Of the 30-month timescale almost a third of the allotted time will be dedicated to work undertaken by another body with no mandated timescales.</p> <p>Under the current system modifications to plans always need to be made and therefore whilst six months for Examination is promoted by the government this is disingenuous as it will almost always be nine months. It is unreasonable for LPAs to appear like they haven't met a timescale that was unrealistic in the first instance.</p> <p>The Planning Inspectorate are already struggling with their existing workload (with Local Plan examinations taking on average a year) so it is unclear how, given the proposed continuous cycle of Local Plan making, the introduction of supplementary plans (which would have to be Examined) and the introduction of additional gateway checks, this would actually speed up the process when all of these things will add to their workload? Significant investment would need to be made to appoint experienced planning inspectors and this is in the current context of a huge undersupply of qualified, experienced planners. Therefore, there is concern that either the Planning Inspectorate will be under resourced or the pull of resources to the Planning Inspectorate will leave LPAs massively under-resourced.</p> <p>The Council supports the proposed changes to the MIQ process.</p> <p>The 'short statements' to be submitted by third parties needs to be qualified (short should be defined) as this provides third parties the opportunity to submit potentially new/extra material that the LPA also needs to review and prepare a response for.</p> <p>The Council also supports a shorter notification for hearings period however, there may be issues with administering an Examination (particularly where an external venue is required) at such short notice. The LPA should be given longer notification.</p>

Consultation Question	Governments Supporting Text	Council Response
	<p>significant reduction in the volume of materials which need to be processed by the Inspector</p> <ul style="list-style-type: none"> <li>• providing the opportunity for third parties to submit a short statement in writing which can be considered by the Inspector, where they do not wish to attend a hearing</li> <li>• shortening the minimum notification for hearings to three weeks by default, in line with the approach to examining Development Consent Orders, and longer by exception only</li> <li>• proposals to streamline the main modifications stage so that only the most significant amendments are consulted on; for example, where a new site is to be inserted into the plan (as opposed to small changes to development management policies), or where there is a legal requirement to consult. The length of time that modifications should be consulted on publicly should be shortened to three weeks by default, and longer by exception only; for example, where there are particularly significant or contentious changes proposed, or where this period would fall over bank holidays.</li> </ul> <p>120. We are also exploring further ways to ensure the evidence required to support a plan is proportionate and robust. This should also help speed up the examination process.</p>	<p>There is some concern that only consulting on 'significant' amendments could open the plan up to legal challenge. Would it be the responsibility of the Planning Inspector to determine which amendments were significant?</p> <p>The Council would support a shorter modifications consultation however there should be recognition that consultations take a significant amount of time to prepare and administer which has currently been overlooked.</p>
<p><b>Question 23: Do you agree that six months is an adequate time for the pause period, and with the government's expectations around how this would operate?</b></p>	<p>121. The Levelling Up and Regeneration Bill provides a new power for Inspectors to pause the local plan examination for a timebound period. We propose to set out in regulations that the pause period may not be longer than 6 months. It would be for the Inspector to decide the length of the pause period within this maximum timeframe. This change formalises a mechanism through which issues with local plans or minerals and waste plans, identified by an Inspector at the examination, can be properly considered and addressed by planning authorities outside of the examination process, without needing to withdraw the plan and start again. This will ensure that more plans can be adopted, more quickly.</p> <p>122. We anticipate that the pause may be activated by the Inspector if a significant issue was identified that could not reasonably be resolved without further work by the planning authority. This may, for example, be a significant issue with the evidence base, or an identified shortfall in land supply where additional site allocations need to be identified. We expect that the power to pause an examination will only be used once in relation to a particular plan.</p> <p>123. The Inspector would write to confirm the problem and the work required. To ensure progress, the Inspector may ask for an overall timetable and regular progress reports. In some cases, it may be helpful for the Inspector to hold an additional hearing before the pause starts to discuss what needs to be done.</p> <p>124. If the relevant matters have been dealt with to the necessary degree before the end of the pause period, then the examination will resume. If not, the Inspector will be required to recommend that the authority withdraw the plan. This will speed up the delivery of up-to-date local plans and minerals and waste plans by preventing plans from becoming stuck in a never-ending examination process.</p>	<p>The Council would support a pause period.</p> <p>The need for a pause should be reduced if the LPA has been given appropriate support throughout the gateway processes. There should however be a very limited amount of discretion that the Examiner can deploy to extend under certain circumstances.</p>
<p><b>Question 24: Do you agree with our proposal</b></p>	<p>125. The English planning system gives communities a key role in planning, so they can take an active part in shaping their areas, and to build local pride and belonging. Within the plan-making process, there are formal requirements in regulations 18 and 19 of the Town and Country Planning</p>	<p>The Council agrees that the approach to engagement should be set out in their project initiation document.</p>

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<p><b>that planning authorities should set out their overall approach to engagement as part of their Project Initiation Document? What should this contain?</b></p>	<p>(Local Planning) (England) Regulations 2012 to invite representations in relation to the local plan, providing vital opportunities for our communities to influence their local area. Whilst there are many positive examples of how community engagement is undertaken, we recognise the challenges associated.</p> <p>126. Existing practises of engagement and consultation in plan-making are widely perceived to be narrow and ineffective. There is currently limited definition around the role of the existing requirements under Regulations 18 and 19, which can create confusion around the purpose of these consultations. For many, consultations on plans can feel too technical and difficult to engage with, discouraging people from having their say whilst disproportionately drawing views from people from a narrow set of demographic groups. Those voices who may benefit most from new development are often the quietest in the planning process.</p> <p>127. We are aware that existing requirements for plan consultation may start too late in the plan-making process and that it can sometimes be perceived that communities are not influencing key decisions. We have heard from statutory bodies that they face challenges identifying the resources needed to feed in their technical expertise, with little warning and limited time to comment. This can create challenges further along the process, for example slowing down examinations if many issues need to be resolved at a late stage.</p> <p>128. We understand that representations can be difficult to process and that questions posed at early stages of plan preparation can be too open ended, resulting in representations which may be vague or lengthy and in some circumstances, submitted in formats with unextractable texts and graphics. Such representations can be difficult for planning authorities to process, compromising the quality of their analysis and subsequently the influence that representations have on the plan.</p> <p>129. We are clear that communities must remain at the heart of the plan-making process, and that local people must have a meaningful say on planning policies that will affect them and their local areas. We want to encourage open dialogue between authorities, communities, and other key stakeholders such as statutory bodies about key local decisions and trade-offs, to help influence the production of genuinely local plans at the earliest stages of plan-making.</p> <p><b>Proposed approach</b></p> <p>130. We want to increase the amount of engagement that takes place during plan-making and the opportunities for communities to influence their plan. We also recognise the continued importance of engaging with the seldom heard, including groups who are less represented and as such we want to support authorities to reach a broader audience and manage engagement more effectively. To achieve this, we are considering several changes which, taken together, will enable improved quality and quantity of community engagement throughout the local plans process. We have grouped our proposals around the following four themes:</p> <ul style="list-style-type: none"> <li>• <b>the role of digital</b> – has the potential to improve both the quality, quantity and diversity of participation within the local plans process, when used in combination with traditional methods;</li> </ul>	<p>We would disagree that engagement starts too late in the current process, our experience is that people don't engage in the earlier parts of the plan-making process because they tend to engage more when plan proposals have a direct impact upon them.</p> <p>In our experience statutory bodies also provide more detail the further through the process that the Council goes (i.e. when proposals are more refined) because of resourcing issues. It's easier for them to provide detailed comments on a limited number of policies or sites than it is to provide detailed comments on all the potential options.</p> <p>Beyond inviting participation, the frontloading of the plan process prior to the 30-month clock starting does seem that under the new system the first formal chance to comment may be later than the existing system.</p> <p>We support the use of digital media in consultation however this must be accompanied by sufficient support and resources to deploy this. Many Planning teams do not have the skills or capacity to learn and deploy new technology (especially given timescale constraints) and the government should not only showcase what could be achieved (as they are doing now) but provide the tools and training for authorities to achieve the same results whilst acknowledging that most do not have the technical knowledge to build or even commission required solutions. These solutions need to be given to us alongside simple instructions as to how to use them.</p> <p>It's not clear how the 'notify' and 'invite' approach will generate the level of engagement that the LPA would want.</p> <p>It should also be recognised that not all LPA areas have the same level of online access or computer literacy and whilst it is recognised that the government support this alongside traditional approaches this added level of complexity does make it harder for LPAs to administer a consultation and consolidate/analyse the responses due to the multiple formats that they are received in.</p> <p>The Council supports the proposed changes to the SCI in favour of a more bespoke/flexible response to take into account changes in technology and Council resources. There should be some flexibility to change the approach set out in the Project Initiation Document throughout the process though in order to respond to unexpected circumstances (e.g. Covid) or to address/respond to issues identified through planned consultation.</p>

Consultation Question	Governments Supporting Text	Council Response
	<ul style="list-style-type: none"> <li>• <b>planning and monitoring the engagement approach</b> – supported by our proposals for a new Project Plan requirement and gateway assessments;</li> <li>• <b>a focus on early participation</b> – introducing a proposed new requirement to “notify” and “invite” participation at the start of the plan-making process, to complement the scoping stage and to encourage early and increased quality of engagement; and</li> <li>• <b>a more standardised approach to consultation</b> - retention of two mandatory consultation windows, which will be more clearly defined and strengthened through regulations to increase their impact.</li> </ul> <p>131. Throughout this chapter, and the wider consultation document:</p> <ul style="list-style-type: none"> <li>• when referring to “engagement”, this is a general reference to any activities undertaken by a planning authority involving communities and other interested parties, rather than a reference to any specific requirement in legislation</li> <li>• references to “participation” relate to the proposed new requirement for planning authorities to notify relevant persons and/or bodies, and invite participation in the local plan. This is intended to address problems that have been identified around communities and other stakeholders being involved too late in the process</li> <li>• “consultation” refers to the two proposed mandatory consultation windows as part of the 30 month plan-making process, and will involve planning authorities inviting representations on the emerging plan</li> </ul> <p><b>Supporting authorities and the role of digital</b></p> <p>132. Digital has the opportunity to play a transformative role in the way in that planning authorities engage people during the plan preparation process, improving both the quality and quantity of responses, and how efficiently those responses are analysed and incorporated into the plan making process. Modern digital engagement tools, combined with more consistent data, could reduce the time it takes to process representations, remove barriers to engagement and improve planning authorities’ abilities to understand community views.</p> <p>133. We want to encourage planning authorities to use a combination of traditional in-person and digital methods to connect with all members of the community. A study by the <a href="#">RTPI and Grayling Engage</a> suggested that out of those surveyed, 49% of people would be more likely to get involved in local decision making if this could be done online. Increasing digital engagement has the potential to ensure that developments and plan-making are being influenced by local voices and in turn meet the needs of local communities.</p> <p>134. Through our <a href="#">Property Technology (PropTech) Innovation Fund</a> , we are piloting and scaling the adoption of digital engagement tools and services by planning authorities across the country. These tools have proven to engage more people and to attract a more representative proportion of local communities. For example, a pilot was undertaken in Epsom &amp; Ewell through the PropTech Innovation fund which demonstrated the power of digital in engaging the seldom heard, with 55% of people who took part saying they had not been involved in a planning consultation before.</p>	

Consultation Question	Governments Supporting Text	Council Response
	<p>135. These approaches will be incorporated into a digital toolkit, which will include digital engagement tools (and templates), to support engagement with members of the community, developers and consultants, enabling an increased range of voices to be heard and offering more opportunities for communities to shape their local areas.</p> <p><b>Planning and monitoring the engagement approach</b></p> <p>136. In the current system, planning authorities are required to produce a Statement of Community Involvement (SCI), which is typically produced outside of the plan process. These are used to set out how the public, statutory bodies and other interested parties will be involved in the preparation of the local plan and other parts of the development plan.</p> <p>137. However, independent analysis commissioned by government found that many SCIs are out-of-date and most go no further than reiterating basic legal requirements on consultation. The legal weight of SCIs (being something that planning authorities must comply with when preparing plans) can prevent planning authorities from expressing creative solutions for engaging with communities because of legal compliance concerns.</p> <p>138. Moreover, where authorities signal a desire to use innovative approaches to community involvement, for example through digital techniques or initiatives like citizens' panels, this is typically expressed as an ambition or aspiration rather than a commitment to do so.</p> <p>139. The Bill removes the requirement to prepare an SCI. We instead propose to use two key levers to drive improvements to the quality of engagement, and to allow authorities to better express their ambitions around engagement and consultation: - authorities will need to outline their overall ambitions and approach to engagement and consultation through their Project Initiation Document. This might include the approaches to be used (including the use of digital engagement tools), what early engagement is planned, and the resources and skills required to deliver this; and - the Project Initiation Document should form the basis for discussion at Gateway 1. Through the gateway assessment, the implementation of this approach will be subject to independent oversight, to ensure that the planning authority is on the right track.</p> <p>140. We want to encourage planning authorities to be ambitious when it comes to outlining their overall ambitions to approaching engagement and consultation. For example, the Project Plan may include how a planning authority intends to connect with groups who have had traditionally low levels of engagement, and how the use of hybrid approaches to engagement might contribute to overcoming this.</p> <p>141. To support planning authorities in scoping out ambitious approaches to engaging communities, tailored to their context, the digital toolkit will distil learnings from the PropTech Fund to be used by planning authorities to support engagement. In addition, we intend to develop new guidance on community engagement, setting out best practice examples, and guiding principles for community engagement activity around the local plan process.</p>	
<p><b>Question 25: Do you support our proposal to</b></p>	<p>142. We have frequently heard from communities and statutory bodies that they are involved too late in the process and that they have been given insufficient notice to comment on the plan. To ensure</p>	<p>The Council is cautiously supportive.</p>

Consultation Question	Governments Supporting Text	Council Response
<p><b>require planning authorities to notify relevant persons and/or bodies and invite participation, prior to commencement of the 30 month process?</b></p>	<p>communities have a stronger role in shaping the vision and strategy for their area, a stronger emphasis on early participation during the initial stages of plan-making will be key.</p> <p>143. As such we are proposing to introduce a new requirement, in regulations, for planning authorities to “notify” stakeholders and “invite” early participation on matters that might shape the direction of the plan. This will enable increased transparency over plan-making timeframes and provide an earlier opportunity for relevant persons and/or bodies, which might include communities, statutory bodies and neighbouring authorities, to have sight of and to influence the plan-making process. The new requirement will sit within the scoping stage, prior to commencement of the 30 month process and before the first mandatory consultation window.</p> <p>144. Whilst we propose to give discretion around what the focus of early participation should be, we intend that the planning authority should use this requirement to gather baseline information to inform the plan and focus on seeking views on plan-preparation activities undertaken within the scoping stage. This could include, as a minimum, seeking views on drafting a vision which will be required to anchor the local plan, initial principles, or other matters such as overall approaches to engagement.</p>	<p>However, it’s not clear what we would be inviting them to participate in and how ‘engaging’ this would be for stakeholders.</p>
<p><b>Question 26: Should early participation inform the Project Initiation Document? What sorts of approaches might help to facilitate positive early participation in plan-preparation?</b></p>	<p>145. In terms of when early participation should take place and how long it should be, we are seeking views on whether it could take the form of a focused, timebound early participation period, inviting feedback on key issues that the plan should address. This may take place around the same time as the formal requirement which will be introduced through regulations to publicise the start of the process (four months prior to the first gateway assessment), or at an earlier stage.</p> <p>146. Alternatively, it may encompass more ongoing, informal engagement exercises taking place over a longer period, for example with statutory bodies to identify key opportunities and risks for the plan, with neighbouring authorities or with communities to help shape the vision of the area.</p> <p>147. In identifying who should be invited to participate in the early stages of plan-making, we propose that the requirement would broadly mirror what is already set out within the existing Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This includes residents and businesses within the local authority area and relevant statutory bodies. We are also proposing that this requirement should also be extended to neighbouring authorities, and any such authority that, in the view of the planning authority, may have an interest in the plan.</p> <p>148. In addition to informing plan options, we also propose that early participation should inform the Project Initiation Document, providing an important opportunity for planning authorities to test how the community would wish to be engaged later on in the process. The outputs of such questions could feed into the ambitions and overall approaches to consultation during the 30 month timeframe, which the planning authority would be expected to include here.</p>	<p>Early participation should inform the project initiation document however, there should be some flexibility to change the approach set out in the Project Initiation Document throughout the plan-making process to respond to unexpected circumstances or to address/respond to issues identified through consultation.</p> <p>A key consideration for the Council will be resource availability and what engagement is going to be most effective. Whilst consulting stakeholders on how they wish to be consulted is useful, it becomes hard for the LPA to manage if there are lots of different requirements.</p>
<p><b>Question 27: Do you agree with our proposal to define more clearly what the role and purpose of the two mandatory consultation</b></p>	<p>149. Formal consultation windows, as part of the 30 month plan-making process, will remain a critical means for planning authorities to seek the views of communities and other stakeholders, including statutory bodies, on plans whilst under development.</p> <p>150. We will be retaining two points of formal consultation within the 30 month plan-making timeframe. We propose to set out in regulations that planning authorities will be required to carry out two rounds of consultation: the first for a minimum of eight weeks after scoping following the first gateway assessment; and the second for a minimum of six weeks shortly before the final gateway</p>	<p>The Council agrees that the purpose of the consultations should be defined however, the usefulness of this will depend upon the definition.</p> <p>There should also be recognition that simply because the purpose has been defined this does not mean that the LPA won’t receive any/all comments that stakeholders want to provide. Even if a set format is defined this will not necessarily be conformed to by responders.</p>

Consultation Question	Governments Supporting Text	Council Response
<b>windows should be?</b>	<p>assessment, prior to submission of the plan for examination. This is longer than the current statutory minimum and is in addition to early participation that would be required during the scoping phase.</p> <p>151. In response to some of the existing challenges around formal consultation in the current system, we propose that in the new system, the regulations governing the two formal consultation windows should:</p>	<p>Given that the second consultation will be towards the end of the process it would probably help to define the question in terms of the legal requirements and tests of soundness as this would help stakeholders focus on issues that would be addressed at Examination and would help the LPA understand what the key issues were. This should be done in a way that is easy to understand so that the LPA does not face criticism about the legibility of the consultation.</p>
<b>Question 28: Do you agree with our proposal to use templates to guide the form in which representations are submitted?</b>	<ul style="list-style-type: none"> <li>• define the role and purpose of these windows more clearly, reflecting where these sit within the wider end-to-end local plan process; and</li> <li>• enable the submission of representations in a form which maintains and strengthens accessibility for communities, but makes it easier for planning authorities to process.</li> </ul> <p>152. In the new system, the Project Initiation Document will be the starting point for planning authorities to set out their proposed methods of consultation. This document will be considered at the first gateway assessment, where the authority's overall approach to engagement and consultation will have received independent oversight to ensure it is on the right track.</p> <p>153. Building on this, we propose to define more clearly in regulations what the purpose of each formal consultation window will be, so that planning authorities know what to focus on, and communities and other users of the system have a better understanding of how their views will be able to influence the process. Our proposals are as follows:</p> <ul style="list-style-type: none"> <li>• The first window should build on outputs from the early participation carried out in the scoping phase. To ensure that communities can meaningfully influence the plan, we expect that questions asked at this consultation will focus on validating the vision for the area and test the broad options for the plan, including the key spatial choices.</li> <li>• The second should seek views on the draft plan which the planning authority intends to submit for examination.</li> </ul> <p>154. By the second consultation window, communities and other stakeholders, including statutory bodies, should have had sufficient opportunity to influence and make representations on wider ideas in the plan, through both early participation and the first consultation window. The second window should therefore be more focused, and key to its success will be ensuring that questions are well-structured and targeted to garner clear community views on specific proposals and improve the clarity of representations received.</p> <p>155. To make representations easier for planning authorities to analyse, we propose to develop a series of templates that authorities should use these to collect responses. Templates have the ability to support planning authorities in analysing responses more effectively and can be used to ensure that submissions are 'machine readable' wherever possible and not submitted in PDF format by default.</p> <p>156. We recognise the importance of maintaining accessibility for all in responding to consultations, therefore templates will be designed to provide sufficient flexibility when used. Development of templates would draw on learnings from existing materials (for example, the <a href="#">model representation</a></p>	<p>The Council agrees with the use of templates to guide responses however, this should be done in a way that is easy to understand so that the LPA does not face criticism about the legibility of the consultation.</p> <p>Unless responses have to be received on the set template then the authority will still have to interpret all of the other responses who haven't used the template, and this will not speed up the process.</p> <p>There should also be consideration for communities who want to submit petitions.</p>

Consultation Question	Governments Supporting Text	Council Response
	<p><a href="#">form</a> already published by the Planning Inspectorate , would be developed collaboratively through a user-led approach and would be designed to support the adoption of digital approaches.</p> <p>157. Other proposals in this consultation will also support our aim for greater involvement, including the local plan timetable which will make it clearer when people are able to have their say, and the new requirement to prepare a policies map that will be digital and interactive, making plans clearer, and easily accessible to all.</p>	
<b>Requirement to assist with certain plan-making</b>		
<p><b>Question 29: Do you have any comments on the proposed list of prescribed public bodies?</b></p>	<p>158. The Levelling Up and Regeneration Bill sets out a “Requirement to Assist with Certain Plan Making”. This will give plan making authorities the power to legally require that “prescribed public bodies” provide assistance to develop or review the local plan, minerals and waste plan, supplementary plan, spatial development strategy, infrastructure delivery strategy, marine plan or policies map. We will set out which organisations are within the definition of prescribed public bodies within regulations, but we propose to include important infrastructure providers, even if they are private utility companies, as well as other bodies of a public nature.</p> <p>159. Our initial proposal for the list of bodies to be given the requirement to assist is set out below, but we are keen to hear views on whether all of these bodies are appropriate or whether other bodies should be added:</p> <p>Proposed prescribed public bodies</p> <ul style="list-style-type: none"> <li>• Environment Agency</li> <li>• Historic Buildings &amp; Monuments Commission for England (Heritage England)</li> <li>• Natural England</li> <li>• Civil Aviation Authority</li> <li>• Homes &amp; Communities Agency</li> <li>• Integrated Care Boards</li> <li>• Office of Road and Rail</li> <li>• Highway Authority, Local Transport Authority, Integrated Transport Authority or Transport for London</li> <li>• Local Enterprise Partnership</li> <li>• Local Nature Partnerships</li> <li>• Local Nature Recovery Strategy responsible authorities</li> <li>• Health &amp; Safety Executive</li> <li>• Lead Local Flood Authority</li> <li>• National Health Service Commissioning Board</li> <li>• Rail Infrastructure Managers or Rail Network Operators</li> <li>• Sport England</li> <li>• Energy Undertakers</li> <li>• Telecommunications Undertakers</li> <li>• Water &amp; Sewerage Undertakers</li> </ul>	<p>The Council believes that the following bodies should also be included:</p> <ul style="list-style-type: none"> <li>• Neighbouring LPAs</li> <li>• The National Forest Co.</li> </ul>

Consultation Question	Governments Supporting Text	Council Response
	<p>Where relevant:</p> <ul style="list-style-type: none"> <li>• Mayor of London</li> <li>• Combined Authorities</li> <li>• Marine Management Organisation</li> <li>• Canal and River Trust</li> <li>• County Councils</li> <li>• Coal Authority</li> <li>• Crown Estate Commissioners</li> <li>• Forestry Commission</li> <li>• National Park Authorities</li> <li>• Office for Nuclear Regulation</li> <li>• Toll Road Concessionaires</li> <li>• North Sea Transition Authority</li> </ul>	
<p><b>Question 30: Do you agree with the proposed approach? If not, please comment on whether the alternative approach or another approach is preferable and why.</b></p>	<p>160. The aim is to avoid either late provision of information or unexpected issues being raised late in the plan preparation process, or even at examination, which will be particularly important in the context of local plans, given the new 30 month timeframe for preparing them.</p> <p><b>Proposed approach</b></p> <p>161. Our proposed approach is that at the beginning of the plan preparation process, in other words during the four months initiation period before the 30 month timeframe begins, plan making authorities notify all relevant interested parties when they commence work on a new plan or revised plan, in much the same way that is common practice already. In the majority of cases this should result in engagement from those bodies at appropriate stages in the plan-making process. The intention therefore is that the requirement to assist will be reserved for cases where the planning authority is not getting the engagement and/or information that it needs. In which case the authority would formally notify the body of the need to provide relevant assistance. We intend to set this out in Planning Practice Guidance, alongside an expectation that any requirements should be proportionate.</p> <p>162. There would however be nothing preventing a plan making authority from notifying relevant bodies under the requirement to assist in that initiation period. If used in this way, there would be no sense in which a notice under the requirement to assist would elevate any concerns where there may be an issue with the provision of assistance.</p>	<p>The Council supports the intention to avoid the late provision of information or unexpected issues being raised late in the plan preparation process.</p> <p>However, whilst the government are proposing a mechanism to require assistance from prescribed public bodies (i.e. the Council formally notify them to assist) it is unclear what happens if the assistance is still not forthcoming or is provided late in any event.</p> <p>Other than having an audit trail to demonstrate which bodies were reluctant to engage in the plan-making process it is unclear what this would achieve.</p> <p>There also needs to be some consideration of the resources available to those bodies for them to effectively engage in the plan making process at what is likely to be an increased frequency nationally and that engagement should be an on-going iterative process.</p>
<p><b>Question 31: Do you agree with the proposed requirements for monitoring?</b></p>	<p>163. The overall purpose of monitoring and reporting is to ensure that plans are meeting their key objectives, policies are effective and that updates of the plan are effective. This will be more important with the clear requirement for a plan update to commence, at the latest, 5 years from adoption. Monitoring can also be a powerful tool to build more trust in the planning process, by showing transparently how well plans are delivering.</p> <p>164. Under the current system, local planning authorities, including those for minerals and waste, are required to produce an Authority Monitoring Report (AMR) to illustrate how local plan policies are</p>	<p>The Council agrees with a light touch approach and then more detailed assessment prior to the commencement of a new plan. However, without having further details of the expectation it is difficult to comment further. It should however be noted that the Council is likely to have to undertake detailed monitoring every-year (to be able to understand the outcomes of the 4<sup>th</sup> year detailed approach) and therefore the only 'saving' in terms of time and resources is the publication of the information which is usually the least resource intensive part.</p>

Consultation Question	Governments Supporting Text	Council Response
<p><b>Question 32: Do you agree with the proposed metrics? Do you think there are any other metrics which planning authorities should be required to report on?</b></p>	<p>being implemented and any additional steps needed to implement policies, and update on the progress against the Local Development Scheme. Where applicable, the AMR must also set out the net additional dwellings (including affordable dwellings) over the reporting period and since the policy was first published or adopted, the details of any neighbourhood development order or neighbourhood development plan that has been made, certain information relating to any Community Infrastructure Levy and updated details of actions taken over the reporting period in regards to the duty to co-operate. There is a separate requirement for Spatial Development Strategies which covers some, but not all the above-mentioned requirements.</p> <p>165. Authorities are also required to monitor the significant environmental effects of the implementation of the plan, for the purpose of identifying unforeseen adverse effects at an early stage and taking appropriate remedial action. Reforms to environmental assessment in Part 6 of the Bill Environmental Outcomes Reports further clarifies this requirement. We will look to combine this requirement with plan monitoring and other environmental reporting requirements wherever possible to maximise synergies and benefits and minimise costs.</p> <p>166. Planning authorities can largely choose for themselves which targets and indicators to use to assess the implementation of policies provided they are in line with the relevant legislation. There is also a degree of flexibility on how frequently AMRs are prepared, so long as they are produced at least every 12 months. The limited detail about what is expected of authorities in the current system results in a variable approach to monitoring, with some authorities clearly devoting significant resources to monitoring and others taking a much lighter touch approach, and it is not always clear that monitoring genuinely assists in supporting updates to plans.</p> <p>167. The Levelling Up and Regeneration Bill provides a power for the government to require planning authorities to provide information, on the implementation of policies relating to the authority's area. They are also required to monitor the environmental effects of the implementation of the plan, and once reforms to environmental assessment processes are in place, the delivery of specified environmental outcomes. We intend to use regulations to give clarity on the requirements and to set a small number of common metrics to monitor implementation of policies. The Bill also enables the establishment of a requirement to monitor the progress of plan preparation, the timings for which would be set out through the local plan timetable.</p> <p><b>Proposed approach</b></p> <p>168. A clearer, more focused approach to monitoring will ensure that planning authorities have a better understanding of how the plan is performing, and the impact of development on the local environment to ensure that subsequent updates to plans can be more targeted. To support this, we propose that monitoring in the new system will have two distinct elements:</p> <ol style="list-style-type: none"> <li>1. <b>a light touch annual return.</b> This will include progress against plan making activities proposed in the local plan or minerals and waste plan timetable, and as a minimum it will also report on a small number of nationally prescribed metrics (see below) to assess the implementation of key policies against the output of the plan. These are intended to remain stable to enable the identification of trends over a longer period. Planning authorities will be free to supplement this list with any locally significant metric that they choose; and</li> </ol>	<p>The monitoring requirements need to be clear, as currently set out some of the proposed standard metric monitoring requirements need more explanation.</p> <p>What does the 'delivery of BNG' mean as an indicator – what is being monitored? How is this reported?</p> <p>What does 'Progress toward net zero emissions from buildings (to be developed)' mean? Are the brackets to indicate that this need to be developed further by the government or does this mean 'with planning permission but not started'? What progress are we monitoring?</p> <p>The EOR monitoring requirement could be a report on its own – it's not clear from the metric provided what level of detail is required here.</p> <p>Monitoring requirements will need to follow financial years to be consistent across authority areas– reference to the anniversary of the Plans adoption in this context is not useful.</p> <p>In addition, whilst the Council recognises the importance of monitoring many large-scale strategic projects that will likely form the subject of the plan are likely to take longer than the initial 4 years to deliver and this expected lag should be recognised (i.e. monitoring indicators of these sites may appear poor during the initial phases of development but they may actually be achieving as expected).</p>

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	<p>2. <b>a detailed return to inform updates to the plan.</b> By 4 years after adoption of a local plan or minerals and waste plan, at the latest, planning authorities should prepare a fuller analysis of how planning policies and designations are being implemented, and the extent to which the plan is meeting the overall vision for their area. This may also consider where policies are no longer relevant. The scope and content of this monitoring report is proposed to be left to individual planning authorities but should be designed to inform the forthcoming update of the plan, which will need to commence five years after adoption, at the latest.</p> <p>169. To ensure clarity and simplification of monitoring plan policies in the new system, we propose to set out a requirement for planning authorities to report against a small set of nationally prescribed metrics. This will support a more streamlined approach to monitoring as authorities will know exactly what they need to report against as a minimum requirement. We therefore propose to require that, as a minimum, planning authorities report on:</p> <p><b>Table 3 Monitoring of plans</b></p> <table border="1"> <thead> <tr> <th data-bbox="448 877 759 947">Proposed monitoring metrics</th> <th data-bbox="834 877 1071 909">Detail of metrics</th> </tr> </thead> <tbody> <tr> <td data-bbox="448 982 566 1014" rowspan="4">Housing</td> <td data-bbox="834 982 1614 1014">Net additional dwellings completed (including conversions)</td> </tr> <tr> <td data-bbox="834 1056 1249 1087">Net affordable units completed</td> </tr> <tr> <td data-bbox="834 1129 1555 1161">Proportion of new homes permitted on brownfield land</td> </tr> <tr> <td data-bbox="834 1203 1567 1234">Net additional pitches &amp; plots for gypsies and travellers</td> </tr> <tr> <td data-bbox="448 1276 581 1308">Economy</td> <td data-bbox="834 1276 1344 1308">Net change in employment floorspace</td> </tr> <tr> <td data-bbox="448 1350 759 1413" rowspan="4">Environment and Open space</td> <td data-bbox="834 1350 1344 1381">Net change in designated open space</td> </tr> <tr> <td data-bbox="834 1455 1567 1486">Net change in designated habitats due to development</td> </tr> <tr> <td data-bbox="834 1528 1338 1560">Delivery of 10% Biodiversity Net Gain</td> </tr> <tr> <td data-bbox="834 1602 1754 1633">Progress toward net zero emissions from buildings (to be developed)</td> </tr> <tr> <td data-bbox="448 1675 581 1707" rowspan="2">Minerals*</td> <td data-bbox="834 1675 1110 1707">Aggregate landbank</td> </tr> <tr> <td data-bbox="834 1749 1703 1843">Amount (ha) of non-mineral development granted permission in a Mineral Safeguarding Area despite a Mineral Planning Authority objection</td> </tr> </tbody> </table>	Proposed monitoring metrics	Detail of metrics	Housing	Net additional dwellings completed (including conversions)	Net affordable units completed	Proportion of new homes permitted on brownfield land	Net additional pitches & plots for gypsies and travellers	Economy	Net change in employment floorspace	Environment and Open space	Net change in designated open space	Net change in designated habitats due to development	Delivery of 10% Biodiversity Net Gain	Progress toward net zero emissions from buildings (to be developed)	Minerals*	Aggregate landbank	Amount (ha) of non-mineral development granted permission in a Mineral Safeguarding Area despite a Mineral Planning Authority objection	
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	Amount (ha) of non-mineral development granted permission in a Mineral Safeguarding Area despite a Mineral Planning Authority objection																		

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	<p>Waste*                      Waste generated (split by waste stream)</p> <hr/> <p>                                    Waste management methods (% recycled, recovered and disposed)</p> <hr/> <p>                                    Capacity at waste management facilities (split by management method)</p> <hr/> <p>Environmental Outcome Reports (EORs)      Assessment of the contribution to meeting Environmental Outcomes and identification of any remedial action that needs to be undertaken</p> <hr/> <p>* These would only be required for plans which include minerals and waste policies, i.e., those prepared by single tier, upper tier and national park authorities.</p> <p>170. To help clarify requirements and support the streamlining of the monitoring requirement, we also propose that a template is made available for authorities to use as the basis for reporting their monitoring activities, to ensure this is done consistently and to enable easier comparisons between the performance of plans in different areas. We propose to set out in policy an expectation that any templates provided by the government will be used by authorities when undertaking their monitoring. Templates will be designed to provide sufficient flexibility, for example to enable authorities to capture their own specific metrics, whilst ensuring that key standards are met.</p> <p>171. We propose that reporting of the minimum requirements, as stated above, takes place annually and is made available digitally and at least on the authority's website by the anniversary of the plan adoption, as this gives a clear target and is helpful to inform the general progress of key policies relating to plan-making.</p> <p>172. To ensure that monitoring is meaningful and tailored to local circumstances, we also propose that on top of the minimum requirement for reporting, planning authorities should monitor against the success of implementation of their specific vision for the local plan or minerals and waste plan. The vision set out by each authority will be underpinned by evidence and based on measurable outcomes that authorities can monitor and report against.</p> <p>173. However, we appreciate that not all policies will benefit from annual reporting, in particular those which relate to the long-term vision where the changes made by the implementation of the policies are not yet visible. We propose that a fuller monitoring report is required to inform the next update of the plan. This would therefore be required at least every four years, but it could be earlier where an update is planned or required to begin less than five years from adoption. The report would need be made available to the Secretary of State and on the authority's website. This report should consider all outcomes as set in the planning authority's vision statement.</p> <p>174. We are considering which environmental metrics would be proportionate for monitoring purposes in the transitional period before the implementation of Environmental Outcome Reports, and whether that should be different to the list in Table 3.</p>	
<b>Supplementary plans</b>		

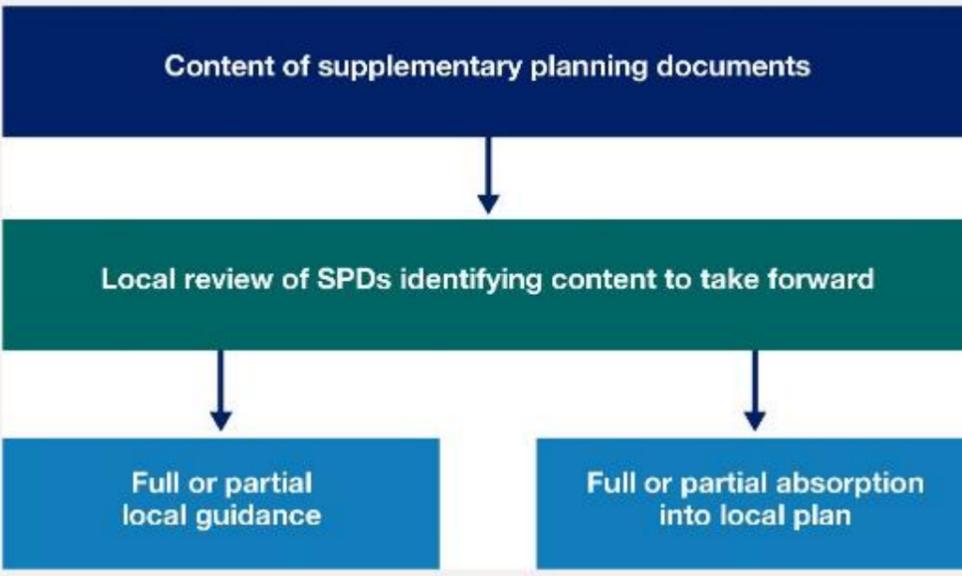
Consultation Question	Governments Supporting Text	Council Response
<p><b>Question 33: Do you agree with the suggested factors which could be taken into consideration when assessing whether two or more sites are ‘nearby’ to each other? Are there any other factors that would indicate whether two or more sites are ‘nearby’ to each other?</b></p>	<p>175. The Levelling Up and Regeneration Bill provides for the creation of new supplementary plans. These plans are intended to be produced at pace to enable planning authorities to react and respond positively to unanticipated changes in their area separate from the local plan or minerals and waste plan preparation process. This could include allocating and shaping an unexpected regeneration opportunity or introducing new site-specific policies including in relation to design, infrastructure or affordable housing. Supplementary Plans are not intended to be used routinely; planning authorities should prioritise including all policies in their local plan or minerals and waste plan, leaving supplementary plans only for exceptional or unforeseen circumstances that need resolving between plans.</p> <p>176. The exception to this is where local planning authorities will also be able to use supplementary plans to discharge the new Bill requirement to produce an authority-wide design code which will be used to provide, or reinforce an authority’s overarching design vision, setting out high level strategic design parameters to apply to development.</p> <p>177. In some circumstances, supplementary plans could also build on existing policies in the development plan, for example, to set out a design code or masterplan for a site allocated in a local plan.</p> <p>178. The reforms will remove the role of Supplementary Planning Documents and Area Action Plans. The introduction of supplementary plans will help to provide clarity and simplify the development plan framework. Supplementary plans will have the same weight as a local plan and other parts of the development plan, giving communities and applicants much more certainty about the documents that applications are determined in line with. They will therefore also be subject to consultation and an independent examination.</p>	<p>No. The Council believes that the scope and distribution factors for the creation of a supplementary plan should be a matter for the Council to decide.</p> <p>It is unclear how ‘a site’ and ‘nearby’ would be defined. Is a site based on land ownership, allocation status in the Local Plan? It is unclear why this would be limited to two (given that this seems to be an arbitrary figure) we have clusters of sites that are classed as a single allocation), there may be more than one site allocation around a single village which may be likely to require the policy change (i.e. all would need to respond to an unanticipated change).</p> <p>In addition, given the time limit for reviewing/preparing a new local plan it is unlikely that any Council will be reliant on supplementary plans as a mechanism to expand the development plan unless absolutely necessary and so the governments inference that this would be used as an additional plan-making route is incorrect.</p> <p>The Council consider that these suggested factors could (and should) be a matter for the LPA to decide.</p>
<p><b>Question 34: What preparation procedures would be helpful, or unhelpful, to prescribe for supplementary plans? e.g. Design: design review and engagement event; large sites: masterplan engagement, etc.</b></p>	<p>179. Like local plans and minerals and waste plans, supplementary plans will not be able to repeat NDMPs and must be in general conformity with a relevant operative Spatial Development Strategy.</p> <p>180. The Bill places certain limits on the allowable scope of supplementary plans (either by subject matter or geographically), so that they do not subvert the role of the local plan as the principal planning policy framework for the local planning authority’s area. Supplementary plans prepared by planning authorities are limited geographically to matters relating to a specific site or two or more nearby sites. However, a supplementary plan prepared by a local planning authority may set out a design code, which may cover a wider area. This will allow supplementary plans prepared by planning authorities to address site-specific needs or opportunities which require a new planning framework to be prepared quickly (like a regeneration opportunity). Supplementary plans prepared by local planning authorities may then also act as a vehicle for setting out authority-wide or other design codes.</p> <p>181. Aligned to the principle that spatial development strategies cannot allocate sites for development, the Bill makes clear that a supplementary plan prepared by the Mayor of London, or other Mayoral Combined Authorities with strategic plan-making powers, may only include requirements with respect to design that relate to development, or development of a particular description, throughout Greater London.</p>	<p>Supplementary Plans are not considered to be a suitable or reasonable alternative to Supplementary Planning Documents. The role of Supplementary Planning Documents should remain.</p> <p>Given the consultation and examination process of preparing a supplementary plan, their limited scope and the fact that LPAs have to set out which ones they are expecting to prepare as part of the Local Plan timetable (prior to starting the Local Plan process) it is not considered that these will be an appropriate tool to allow the Council to react quickly to changes or be prepared at pace.</p> <p>Where new regulations or policy would affect the whole of the authority area, with the removal of SPD’s and Area Action Plans the only way that the Authority could react would be to prepare a new local plan. Or where changes come in during the preparation of a local plan it is likely that this would have consequences for the local authority in meeting its 30-month timescale.</p>

Consultation Question	Governments Supporting Text	Council Response
	 <p>182. As such, if area wide planning policies need updating or a new policy, other than one addressing design, is required to cover an entire authority area, local planning authorities will need to update their local plan instead of preparing a supplementary plan. This equally applies in respect of minerals and waste plans, which should be updated as necessary by minerals and waste planning authorities.</p> <p>183. The Bill states that all supplementary plans must be designed to secure that the development and use of land in the authority's area contribute to the mitigation of, and adaption to, climate change, so far as the relevant plan-making authority consider appropriate, having regard to the subject matter of the supplementary plan.</p> <p>184. Supplementary plans will also benefit from wider reforms mentioned in this consultation document. These include ensuring evidence base requirements are proportionate and plan preparation processes and plans themselves are digital, transparent, understandable and map-based.</p> <p><b>Proposed approach</b></p> <p><b>Preparation procedure</b></p>	

Consultation Question	Governments Supporting Text	Council Response
	<p>185. As part of the local plan timetable or minerals and waste plan timetable Bill provisions, planning authorities will need to set out any supplementary plans which they are to prepare and certain details including: the subject matter and geographical area, site or sites to which each of those supplementary plans is to relate and whether the authority is to prepare a joint supplementary plan. Because they are optional, supplementary plans will not have a defined preparation time such as the 30 months proposed for local plans and minerals and waste plans. As set out previously, supplementary plans should not be used routinely, local planning authorities should make every effort to include policies and allocations in their local plans.</p> <p>186. The Bill sets out that supplementary plans must be in general conformity with a relevant operative spatial development strategy and the relevant plan-making authority must have regard to any other part of the development plan which has effect for the area or a site to which the plan relates when preparing a supplementary plan (including the local plan and its local vision for growth, and any neighbourhood plans). However, they can be prepared prior to the adoption of a new style local plan.</p> <p>187. Whilst local plans and minerals and waste plans will continue to lead the planning policy response to the local vision and spatial strategy and holistically plan for the local area, supplementary plans will provide a mechanism to respond to unanticipated development opportunities between plan-making cycles, with the expectation that supplementary plan content will be merged into the next iteration of the local plan, where those policies remain relevant.</p> <p>188. The Bill sets out that supplementary plans prepared by planning authorities may contain any subject matter which may be in a local plan or minerals and waste plan but must be site specific or relate to two or more sites which an authority consider nearby to each other; except for design related supplementary plans which may be authority area wide.</p> <p>189. For site based supplementary plans only, when assessing whether two or more sites are 'nearby' to each other, important factors could include: geographical distance between sites; relationship to sites in other similar sized settlements or neighbourhoods in the authority area (or neighbouring authority area, for a joint supplementary plan)) or for the delivery of planning obligations.</p> <p>190. Depending on content, supplementary plans may be subject to Environmental Assessment (or subsequent Environmental Outcomes Reports) obligations. We expect planning authorities to use an environmental screening approach for supplementary plans similar to that used for neighbourhood plans.</p> <p>191. The Bill allows for regulations to make provision about the preparation, withdrawal or revision of supplementary plans. Given the possible diversity and flexibility of supplementary plans, different preparation procedures may be suitable for different types of supplementary plans.</p>	
<p><b>Question 35: Do you agree that a single formal stage of consultation is considered</b></p>	<p>192. Supplementary planning documents or guidance currently go through limited consultation and no public examination. Supplementary plans will undergo formal consultation with communities and stakeholder, including statutory bodies and independent examination.</p>	<p>Supplementary Plans are not considered to be a suitable or reasonable alternative to Supplementary Planning Documents. The role of a Supplementary Planning Document is different to that of a Supplementary Plan and therefore they are not directly comparable. Supplementary Planning Documents should remain.</p>

Consultation Question	Governments Supporting Text	Council Response
<p><b>sufficient for a supplementary plan? If not, in what circumstances would more formal consultation stages be required?</b></p>	<p>193. A key objective for planning reform is to enhance opportunities for public involvement, which includes where planning authorities are creating policies on additional matters not covered in their local plan, or minerals and waste plan, for example, through supplementary plans.</p> <p>194. The government remains committed to support planning authorities on plan-making engagement and we intend to set out in guidance that informal engagement will be encouraged throughout the supplementary plan-making process. However, there is a balance to be struck when preparing plans that aim to be able to flexibly respond to planning needs, at pace, whilst ensuring sufficient meaningful formal consultation opportunities. The Bill ensures that regulations must require a proposed supplementary plan to be the subject of consultation with the public. We intend to set out in regulations that supplementary plans should have a minimum of one formal consultation stage, the timeframe for which will be set out in the local plan timetable or minerals and waste plan timetable.</p>	<p>Whilst the Council can appreciate that limiting the need for consultation to a single consultation would streamline the process at the beginning. Removing the need for public engagement in the process of drafting is likely to mean that the Examination process is more protracted and onerous for the LPA and so it won't actually save on time or officer resources in the longer term.</p> <p>If Supplementary Plans have the same weight as a Local Plan why would/should public engagement be less especially when a key objective for planning reform is to enhance opportunities for public involvement.</p> <p>A single formal consultation is not considered to be enough for a document which will have the same weight as a Local Plan.</p>
<p><b>Question 36: Should government set thresholds to guide the decision that authorities make about the choice of supplementary plan examination routes? If so, what thresholds would be most helpful? For example, minimum size of development planned for, which could be quantitative both in terms of land use and spatial coverage; level of interaction of proposal with sensitive designations, such as environmental or heritage.</b></p>	<p>195. The Bill's approach to the independent examination of supplementary plans is broadly modelled upon the existing arrangements for neighbourhood plans (which already form part of the development plan once brought into force).</p> <p>196. The general rule is that the independent examination is to take the form of written representations. However, the examiner must cause a hearing to be held for the purposes of receiving oral representations if the examiner considers that the consideration of oral representations is necessary to ensure adequate examination of an issue or that a person has a fair chance to put a case.</p> <p>197. The Bill provides two options for the independent examination of supplementary plans. Plan-making authorities may submit their draft supplementary plan to the Secretary of State, for the examination to be carried out by a person appointed by the Secretary of State, or to an examiner of the authority's choosing who is an independent, impartial person and who is suitably qualified.</p> <p>198. The government believes that the examination process for neighbourhood plans remains fit for purpose. However, we have heard views that, for especially large, complex, or locally contentious supplementary plans, it might be more appropriate for the examination to be carried out by a person appointed by the Secretary of State. This is due to the additional resources and expertise that the Planning Inspectorate can call upon, and because the Bill sets out that where supplementary plans are adopted, this must be with modifications recommended by examiners.</p> <p>199. With these matters in mind, we are keen to hear views on whether we should set thresholds to guide the decision that authorities make about the choice of which supplementary plan examination route to follow.</p>	<p>It is unclear why thresholds to guide the type of examination for a supplementary plan would be useful when the decision to have written or oral examination would be at the behest of the Examiner (i.e. wouldn't be the choice of the LPA).</p> <p>The Council welcomes the general rule that examination should take the form of written representations but considers that this should be strengthened and that this should be the assumed approach unless exceptional circumstances means that oral hearings should be undertaken.</p> <p>Oral hearings are resource intensive and have a significant financial and staff time implications.</p>

<p><b>Question 37: Do you agree that the approach set out above provides a proportionate basis for the independent examination of supplementary plans? If not, what policy or regulatory measures would ensure this?</b></p>	<p>200. The Bill sets out that an examiner cannot recommend that a supplementary plan is adopted until they consider that the relevant procedural requirements have been met. These include consideration of whether the authority or plan:</p> <ul style="list-style-type: none"> <li>a. has had regard to, where necessary, to other parts of the development plan when preparing their supplementary plan</li> <li>b. is in general conformity with an operational strategic development strategy</li> <li>c. secures that local development and use of land contribute to the mitigation of and adaption to climate change</li> <li>d. if the supplementary plan includes sites that are “nearby” to each other</li> <li>e. have complied with any requirements relating to the preparation of supplementary plans set out in regulations, including requirements in relation to consultation with the public</li> <li>f. has had regard to government guidance that may be relevant. We expect that this will apply to all planning guidance, including the extent of evidence required, rather than simply new guidance prepared to support the preparation and examination of supplementary plans</li> </ul> <p>201. We also propose to set out in regulations a requirement for plan-making authorities to prepare a statement for the examiner setting out how their plan has addressed the points above, to ensure clarity for the examiner and interested parties.</p> <p>202. SPDs provide advice or guidance which covers a wide range of topics, local detail and evidence and are an expression of a planning authority’s position on how this is expected to be treated in decision taking.</p> <p>203. Our December 2022 consultation <a href="#">Levelling-up and Regeneration Bill: reforms to national planning policy</a>, proposed that when the new plan-making system comes into force, existing SPD Regulations (and SPDs) will remain in force for a time-bound period; until the local planning authority is required to adopt a plan prepared under the reformed system when current SPDs will automatically cease to have effect.</p> <p>204. Based on feedback received, we confirm our intention, contingent upon Royal Assent of the Levelling Up and Regeneration Bill, as well as Parliamentary approval of the relevant regulations, SPDs will remain in force until planning authorities adopt a new style local plan or minerals and waste plan.</p> <p>205. We acknowledge that authorities have invested considerable time and effort in creating SPDs and that their content is locally beneficial. With this in mind, planning authorities should review their SPDs to identify whether the advice or guidance is still relevant and consider whether the content should be revised and remain as guidance, or should be integrated into their new-style local plan. Planning authorities should ensure that important policies which are required for decision-making purposes sit within the local plan or minerals and waste plan.</p>	<p>It is unclear what “is in general conformity with an operational strategic development strategy” means if this is different from a Development Plan Document.</p> <p>If a supplementary plan is required as a result of a previously unidentified change (e.g. to Regulations) then it’s unlikely that this would have previously been considered and therefore its not clear if this would be the case.</p> <p>The Council objects to the removal of SPDs as these are key to add context to policies and allow Council to react quickly to change. The new proposed Supplementary Plans, because of their limited scope, are not an appropriate replacement.</p>
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Consultation Question	Governments Supporting Text	Council Response
<b>Minerals and waste plans</b>		
<p><b>Question 38: Are there any unique challenges facing the preparation of minerals and waste plans which we should consider in developing the approach to implement the new plan-making system?</b></p>	<p>206. The minerals planning system plays an essential role in ensuring that there is a sufficient supply of the materials required to deliver the infrastructure, buildings, energy and goods the country needs. The waste planning system plays an equally important role in minimising waste generation and ensuring that there is adequate capacity to sustainably manage waste which is produced. Robust, up to date, locally produced minerals and waste plans underpin the effective delivery of the planning system for these types of development.</p> <p><b>Proposed approach</b></p> <p>207. Minerals and waste plans will continue to form an important part of the development plan under the reformed system. The Levelling Up and Regeneration Bill requires each minerals and waste planning authority to prepare “one or more documents which are to be known collectively as the minerals and waste plan”. This will continue to enable minerals and waste plans to be produced as:</p> <ul style="list-style-type: none"> <li>a. A single document - a minerals and waste plan</li> <li>b. separately – a minerals plan and a waste plan</li> <li>c. where possible through local government structure, incorporated as part of a local plan, as set out in Section 15C(8).</li> </ul> <p>208. Whilst the approach taken in the Bill means that minerals and waste plans are now distinct from local plans in legislation, many of the provision in the Bill relating to local plans also apply to minerals and waste plans. In developing further implementation detail in relation to this through regulations, we propose that the process for the preparation, examination, review and updating of a document which is to be, or form part of, a minerals and waste plan, will continue to be the same as that for a local plan. As such, other parts of this consultation document are relevant to minerals and waste plans, and we would encourage comments or concerns on how the new system would work for minerals and waste plans to be raised through the specific questions posed throughout this document.</p> <p>209. There is no change proposed to the authorities which are required to consider local planning policy for minerals and waste under the existing system. The flexibility provided in the Bill enables authorities to continue incorporating their minerals and waste policies to their local plan where they have powers for both local plans and minerals and waste plans. This will ensure authorities are able to take whichever approach works best for their local circumstances.</p> <p>210. Recognising that minerals and waste are often strategic cross boundary issues, it will also continue to be possible for two or more minerals and waste planning authorities to work together to produce a joint minerals and waste plan where this would appropriate.</p>	<p>The council is not a minerals or waste authority and therefore does not have any comments to make on this issue.</p>
<p><b>Question 39: Do you have any views on how we envisage the Community Land Auctions</b></p>	<p>211. Part 5 of the Levelling Up and Regeneration Bill provides for time-limited pilots of Community Land Auctions (CLAs), expiring ten years after the date the first CLA regulations are made. CLAs are a longstanding idea for capturing uplift in land value, akin to competitive tendering, and are a</p>	<p>There is concern that the process is overly simplified in that some of the assumptions applied. What would prevent landowners artificially inflating the price (by agreeing a floor) that they would be willing to sell at to increase their own profit margins, subsequently reducing the uplift that the Council would get?</p>

Consultation Question	Governments Supporting Text	Council Response
process would operate?	process of price discovery. They provide an alternative approach for identifying land for allocation for development which seeks to improve land value capture for the benefit of local communities.	
<p><b>Question 40: To what extent should financial considerations be taken into account by local planning authorities in Community Land Auction pilots, when deciding to allocate sites in the local plan, and how should this be balanced against other factors?</b></p>	<p>212. The value of land typically increases at numerous points in the development cycle. For example, land value increases when land is allocated in a local plan, and when planning permission is granted (with 'hope value' increasing in relation to the likelihood of either of these events). The current system of developer contributions captures a proportion of this value uplift via negotiated agreements between the local planning authority and the developer (section 106 planning obligations) or through a local levy mechanism such as the Community Infrastructure Levy (CIL), or the proposed Infrastructure Levy (IL) as introduced through the Levelling Up and Regeneration Bill. Both section 106 and CIL rely on local planning authorities making assumptions about the premium required by a landowner to release their land for development.</p> <p>213. For s106 agreements, this can manifest itself through viability negotiations between the local planning authority and developer. Under this system, there is a risk that developers will pay more for land than is necessary, and negotiate down their developer contributions, to ensure development remains viable. For CIL and the IL, local planning authorities set non-negotiable rates, which developers must pay. When setting rates, the local planning authorities must balance the desirability of securing funding with the need to ensure that development remains viable, and land will continue to be brought forward for development. When setting rates, local planning authorities typically make assumptions about the land value uplift that will occur, and the level of premium that a landowner will require in order to ensure that development will come forward.</p> <p>214. The competitive nature of CLAs will encourage landowners to reveal the true price at which they would willingly part with their land: if they choose to offer a higher price, they risk another site being allocated for development, in which case they will secure no value uplift at all through the CLA arrangement. In a CLA arrangement, the local planning authority does not have to assume landowner premiums, as the local planning authority will know the exact price at which landowners would sell their land for the purposes of development.</p> <p>215. While assumptions can be made about the average premium required, the exact premium will change from site to site, depending on the circumstances of the landowner. CLAs are a process that seek to 'discover' the actual price at which an individual landowner will release their land for development, rather than making broader assumptions about the average premium needed.</p> <p>216. CLAs are designed to dovetail into the new local plan making process, more detail in respect of which can be found throughout the other chapters of this consultation.</p> <p><b>Community Land Auctions and the Infrastructure Levy in the Levelling Up and Regeneration Bill</b></p> <p>217. The Levelling up and Regeneration Bill gives the government powers to introduce a new Infrastructure Levy (IL). The new IL will be a locally-set, mandatory charge levied on the final value of development and will largely replace the existing system of developer contributions. The IL will be the main mechanism to improve land value capture and address problems arising in the current system, the details of which were recently subject to a technical consultation.</p>	<p>There is serious concern regarding uplift (i.e. financial benefit) being a key consideration in the site allocation process and soundness of the Local Plan. This could lead to accusations of foul play and could lead to harm to relationships between the community and the Council. This could be further eroded as we would be both financially benefitting from allocating the site but also gaining consent.</p> <p>It would be difficult for the Council to allocate sites that are less sustainable as a result of financial considerations.</p> <p>This process could add delay to the delivery of the site as the Council would be the 'middle man' gaining consent for re-sale to a builder which would involve significant legal and other internal processes and also assumes that the Council has the skills and knowledge available to undertake this type of work.</p> <p>This system incorrectly assumes that the majority of sites do not already have a developer 'option' on them – these sites would presumably be excluded from entering into a bidding process due to other existing legal constraints / agreements.</p> <p>Where existing sites struggle in viability terms (e.g. contaminated brownfield sites) it is unclear how these would 'compete' against greenfield sites which are often more financially viable – therefore the proposals seem to oppose the 'brownfield first' ambition.</p> <p>The combinations of CLAs, ILs and S106 is creating a very complex environment to secure infrastructure delivery. The more complex the system is the longer its likely to take and the more resource intensive it is for the LPA.</p> <p>Consideration should be given for the ability for Councils to gain planning consent on the land prior to re-sale (which should further increase the uplift available).</p>

Consultation Question	Governments Supporting Text	Council Response
	<p>218. However, CLA arrangements provide the opportunity to pilot a further innovative approach in certain areas, which may support increased land value capture. DLUHC expects that CLA arrangements will be put in place and run in a small number of local planning authorities, who will put themselves forward to participate in the pilot, referred to throughout the remainder of this section as ‘piloting authorities’. The detailed design of CLA arrangements will be set out in CLA regulations, and it is our intention to pilot CLA arrangements in different areas with different characteristics, to ensure that their effectiveness can be measured across a variety of geographical areas. In piloting authorities, land will be brought forward and allocated for development in the local plan through the CLA arrangement.</p> <p>219. This section invites comments from respondents on the Community Land Auction pilot proposals. Consultation responses will inform the preparation and content of CLA regulations. We intend to consult on the draft CLA regulations in due course.</p> <p><b>Proposed approach</b></p> <p><b>Community Land Auctions process</b></p> <ul style="list-style-type: none"> <li>• <b>Identification of land for allocation in a local plan</b></li> </ul> <p>220. In piloting authorities, as part of the site identification and selection process, landowners ‘bid’ to have their land selected for allocation in an emerging local plan by stating the price at which they would willingly sell their land for development. The offer from the landowner, once an option agreement is in place with the piloting authority, becomes a legally binding option (known as a “CLA option”).</p> <ul style="list-style-type: none"> <li>• <b>Assessment of land put forward for allocation</b></li> </ul> <p>221. Once the piloting authority has acquired options over land put forward in the site identification phase, they will then decide which land to allocate in their emerging local plan by considering a range of factors that will be set out by the government. Unlike the conventional local plan-making process, the Bill sets out that when CLA-piloting authorities are making decisions surrounding site allocation, they will also be able to consider the financial benefits that they are likely to accrue from each site. Financial benefits include the benefits that a piloting authority will or could derive from a CLA option, allowing option prices to be taken into account as part of the land allocation process for a local plan. How, and the extent to which, financial benefits may be taken into account, including how they are to be weighed against other factors, will be set out in CLA regulations. The existing requirement to prepare local plans with the objective of contributing to the achievement of sustainable development as per Section 39 of the Planning and Compulsory Purchase Act 2004, will remain.</p> <ul style="list-style-type: none"> <li>• <b>Consultation and examination</b></li> </ul> <p>222. Piloting authorities will be required to consult on the proposed land allocations in their draft local plan, before the plan is submitted and independently examined in public, in accordance with the local plan preparation procedures (as modified by Schedule 7 to the Bill) (see <a href="#">Chapter 2</a>). We set out in our May 2022 <a href="#">Levelling Up and Regeneration Bill policy paper</a>, and confirmed in <a href="#">Chapter 8</a>, that</p>	

Consultation Question	Governments Supporting Text	Council Response
	<p>there will be a requirement for two mandatory consultation windows before plans are submitted for independent examination.</p> <p>223. The examination of local plans where a CLA arrangement is in place will be the same as the examination of local plans in areas where CLA arrangements are not being piloted (the proposals for which are set out in <a href="#">Chapter 7</a>), with one material difference. This difference is that, as set out in the Bill, an Inspector will also be permitted to take into account any financial benefits that the piloting authority has, will or could derive from a CLA option when deciding whether or not the plan is sound. We will set out in CLA regulations how, or the extent to which, financial benefits may be taken into account when deciding whether the plan is sound, including how any financial benefit is to be weighed against any other relevant factors.</p> <p><b>Auction</b></p> <p>224. Once the local plan is adopted and sites are allocated, the piloting authority can sell the CLA options over the land the piloting authority has allocated for development. In line with new section 15C(3), to be inserted into the Planning and Compulsory Purchase Act 2004 by Schedule 7 to the Bill, local plans will need to include policies setting out the type of development that will be acceptable on allocated sites. This will provide certainty to developers and communities. These policies may also set out on-site infrastructure requirements, or requirements relating to affordable housing, and how other local and national policies will be applied. Piloting authorities may wish to bring forward some further detail in a site-specific Supplementary Plan (under provisions in new section 15CC, to be inserted into the Planning and Compulsory Purchase Act 2004 by Schedule 7 to the Bill) (see <a href="#">Chapter 11</a>).</p> <p>225. If the CLA option is sold, the piloting authority keeps the amount the successful bidder paid for the option (the “CLA receipts”). The successful bidder owns the option and can exercise the option (to purchase the land) by paying the price set out by the original landowner in the option agreement to the landowner. Piloting authorities can also exercise options themselves to buy the land, and either sell the land to a successful bidder, or develop the land themselves. Planning permission will not be granted automatically on sites that have been allocated in the local plan through the CLA arrangement, and planning permission will need to be sought in the usual way.</p> <ul style="list-style-type: none"> <li>• <b>Spending receipts collected from a CLA arrangement, and the CLA Infrastructure Delivery Strategy</b></li> </ul> <p>226. The piloting authority will be able to spend CLA receipts in accordance with requirements set out in CLA regulations. Clause 134(1) of the Bill requires CLA regulations to set out that piloting authorities must spend CLA receipts on supporting the development of an area by funding infrastructure or on funding the operation of CLA arrangements in relation to the piloting authority’s area. There is a non-exhaustive definition of “infrastructure” in clause 134(4), which replicates the list set out for the IL in new section 204N (to be inserted into the Planning Act 2008 by Schedule 12 to the Bill).</p> <p>227. To strengthen infrastructure delivery and identify infrastructure priorities, piloting authorities may be required by CLA regulations to prepare and publish a CLA Infrastructure Delivery Strategy (IDS), as set out in clause 137(1) of the Bill. This would allow piloting authorities to take a more</p>	

Consultation Question	Governments Supporting Text	Council Response
	<p>strategic approach to the delivery of local infrastructure by setting out the strategy for delivering local infrastructure, including affordable housing, and spending of CLA receipts, to give communities a clear view of how piloting authorities intend to use CLA receipts in their area.</p> <p>228. The aim of the CLA IDS would be to provide certainty and clarity to infrastructure providers and developers regarding the deliverability of infrastructure required by the local plan, as well as the feasibility of securing the necessary funding for schemes. It would seek to make the use of developer contributions (including CLA receipts) more strategic.</p> <p>229. The CLA IDS would replicate our approach to spending and infrastructure delivery as required for the IL as set out in the recent technical consultation. The key difference is that whilst IL regulations must make regulations to this effect, CLA regulations may make regulations requiring the use of an IDS. The government sought views on how an effective IDS would operate in the technical consultation on the Infrastructure Levy. Retaining this optionality for CLA arrangements would allow the Secretary of State to take a judgement as to whether piloting authorities should also be required to publish a CLA IDS when running the novel CLA process.</p> <p><b>How will Community Land Auction arrangements align with other systems of developer contributions?</b></p> <p>230. Community Land Auction arrangements will become a significant source of land value capture in areas where they are piloted. However, it will still be necessary to have other forms of developer contributions in place, for instance to secure infrastructure and onsite affordable housing. Where other forms of developer contributions are in place, we expect this to be reflected in the auction prices that developers pay in order to secure land.</p> <p>231. In the first instance, we expect pilot authorities will introduce Community Land Auction arrangements instead of the IL, and to secure infrastructure and affordable housing contributions through s106 agreements where necessary. This will be necessary to ensure that piloting authorities are being asked to deliver a manageable amount of change, and to isolate the impacts of CLAs against those of the IL, which will enable us to properly assess the effectiveness of Community Land Auction arrangements. However, in the longer term, we can explore aligning CLAs with the IL.</p>	

Consultation Question	Governments Supporting Text	Council Response
	<p><b>Figure 7 Community Land Auction process</b></p> <ul style="list-style-type: none"> <li><b>Site identification</b> <ul style="list-style-type: none"> <li>LPA identifies land to be offered for sale.</li> <li>LPA offers to buy the land (subject to a legally binding option or option agreement) to a range of interested parties.</li> <li>The offer from the highest bidder is accepted.</li> </ul> </li> <li><b>Site assessment</b> <ul style="list-style-type: none"> <li>LPA decides which land to offer for sale.</li> <li>The LPA considers a range of options that will be set out in the plan.</li> <li>LPA considers the potential benefits of the land, including any potential benefits to the community.</li> </ul> </li> <li><b>Plan consultation and submission</b> <ul style="list-style-type: none"> <li>LPA prepares a plan, including proposed land allocations.</li> <li>The plan is submitted to the council.</li> </ul> </li> <li><b>Plan adoption and land allocation</b> <ul style="list-style-type: none"> <li>The plan is adopted and land is allocated.</li> <li>Land allocation decisions will set out what type of development will be acceptable on allocated sites.</li> <li>Any options over land which are not included in the adopted plan cease to have effect.</li> </ul> </li> <li><b>CHOICE 1: LPA sells the option</b> <ul style="list-style-type: none"> <li>LPA may offer to sell the option to land that has been allocated in the plan.</li> <li>If the LPA does not sell the option, the land will be allocated to the highest bidder.</li> </ul> </li> <li><b>CHOICE 2: LPA exercises the option</b> <ul style="list-style-type: none"> <li>LPA exercises the option, paying the original option price to the landowner in order to purchase the land.</li> </ul> </li> <li><b>CHOICE 3: LPA exercises the option</b> <ul style="list-style-type: none"> <li>LPA exercises the option, paying the original option price to the landowner in order to purchase the land.</li> </ul> </li> <li><b>Option exercised by successful bidder</b> <ul style="list-style-type: none"> <li>LPA exercises the option to purchase the land, paying the original option price to the landowner.</li> <li>Successful bidder then makes the land available for development.</li> </ul> </li> <li><b>LPA sells the land</b> <ul style="list-style-type: none"> <li>LPA exercises the option to purchase the land, paying the original option price to the landowner.</li> <li>Successful bidder then makes the land available for development.</li> </ul> </li> <li><b>LPA exercises the option</b> <ul style="list-style-type: none"> <li>Successful bidder then makes the land available for development.</li> </ul> </li> <li><b>Land is developed</b> <ul style="list-style-type: none"> <li>Development is carried out in accordance with the plan.</li> </ul> </li> </ul>	

**Approach to roll out and transition**

<p><b>Question 41: Which of these options should be implemented, and why? Are there any alternative options that we should be considering?</b></p>	<p>232. We remain committed to ensuring a smooth transition from the current to the future plan-making system. Below, subject to Royal Assent of the Levelling Up and Regeneration Bill, we confirm certain key milestones and also set out further matters on which we would welcome feedback.</p> <p>233. Our December 2022 consultation <a href="#">Levelling-up and Regeneration Bill: reforms to national planning policy</a>, proposed that:</p> <p>plan makers will have until 30 June 2025 to submit their local plans, neighbourhood plans, minerals and waste plans, and spatial development strategies for independent examination under the existing legal framework...[and]...all independent examinations of local plans, minerals and waste plans and spatial development strategies must be concluded, with plans adopted, by 31 December 2026. These plans will be examined under the current legislation.</p> <p>234. Consultation respondents saw these proposals as broadly reasonable, if challenging, allowing time for authorities to get up-to-date plans in place. There were wide-spread calls to provide some flexibility on the 31 December 2026 adoption deadline, to avoid a 'cliff edge' scenario.</p> <p>235. <b>We confirm our intention that the latest date for plan-makers to submit local plans, minerals and waste plans, and spatial development strategies for examination under the current system will be 30 June 2025. We also confirm our intention that those plans will, in general, need to be adopted by 31 December 2026. As referred to above, these dates are</b></p>	<p>We would wish to reassert that the 31 December 2026 cut off should be flexible where a Local Plan is in the Examination process but was for example delayed as a result of a lack of Inspectors available in the Planning Inspectorate.</p> <p>Given that there is work for a LPA to undertake prior to the formal commencement of the new style plan the government needs to be clear that in circumstances where a LPA does have to use the new style plan system the requirement would kick in straight away but there must be some consideration given to the work (and subsequent time lag) that will be required in advance of the formal commencement of the process.</p> <p>The guidance and secondary legislation should be published by the government at the latest in the Autumn of 2024. There should be a fixed date set out clearly by the government. The Council has limited faith in the government sticking to its own vague timescales as recent performance (e.g. BNG) has been poor on this issue and having fixed dates for LPAs but vague dates for the government which are subject to slippage only causes negative knock-on impacts for the LPA.</p> <p>Consideration should be given starting Councils within the same HMA at the same time (i.e. within 5 years of the most recently adopted plan). Given the cross-boundary nature of plan-making and the need to adhere</p>
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Consultation Question	Governments Supporting Text	Council Response
	<p><b>contingent upon Royal Assent of the Levelling Up and Regeneration Bill, as well as Parliamentary approval of the relevant regulations. However, we are setting this out now to provide planning authorities with as much notice as possible of these dates.</b></p> <p>236. For local plans and minerals and waste plans, this would mean that if an authority were to fail to meet the adoption deadline, or their plan were to fail at examination or be withdrawn, they would, in general, be required to commence preparation of a new-style plan immediately.</p> <p>237. Regulations will provide limited flexibility for authorities to adopt plans at a specified later date in the most exceptional circumstances. Arrangements for Neighbourhood Plans will be set out in due course.</p> <p>238. <a href="#">Our December 2022 consultation</a> also proposed the following timeline for preparing local plans, spatial development strategies, minerals and waste plans and supplementary plans under the reformed system:</p> <p>Authorities that have prepared a local plan, spatial development strategy or minerals and waste plan which is more than 5 years old when the new system goes live (and are not proactively working towards the 30 June 2025 submission deadline under the current system) will be required to begin preparing a new style local plan, spatial development strategy or minerals and waste plan straight away.</p> <p>Authorities that have prepared a local plan, spatial development strategy or minerals and waste plan which is less than 5 years old when the new system goes live will not be required to begin preparing a new-style plan until their existing plan is 5 years old. So, for example, if an authority last adopted a local plan on 31 March 2022, the preparation of a new plan must start by 1 April 2027. For a plan adopted in mid-December 2026, the preparation of a new plan must start by mid-December 2031. The period of 5 years applies from the date of adoption. Authorities can begin preparing a new plan sooner if they wish.</p> <p>Authorities that do not meet the 30 June 2025 submission deadline for 'old-style' plans (as set out previously) will need to prepare plans under the new plan-making system.</p> <p>239. The consensus among consultation respondents was that the government should put in place a transitional timetable for plan preparation, covering the transitional period and beyond.</p> <p>240. We confirm our intention to have in place the regulations, policy and guidance by autumn 2024 to enable the preparation of the first new-style local plans and minerals and waste plans. As set out above, this deadline is contingent upon Royal Assent of the Levelling Up and Regeneration Bill, as well as Parliamentary approval of the relevant regulations.</p> <p>241. While many local planning authorities supported our timeline proposals, some feedback suggests that it might be unrealistic for a large group of authorities to commence plan-making at exactly the same point. Concerns were also raised about a lack of professional capacity in the system to support this and that such an approach would not enable authorities to learn from</p>	<p>to very strict timescales plans being prepared to very different timescales could have significant impacts on the ability of plans to be progressed and outcomes/ambitions of the Local Plan. Staggering the start timescales based on last plan production doesn't assist LPAs within the same geographically located areas. This could also assist with shared learning between neighbouring partner authorities.</p>

Consultation Question	Governments Supporting Text	Council Response
	<p>emerging best practice. Our analysis suggests that, under the proposal set out above, around 90 authorities could be required to start preparing new-style local plans at the same time.</p> <p>242. So, to ensure a smooth transition to the plan-making new system, we are seeking views on options for a more phased roll out.</p> <p><b>Proposed approach</b></p> <p>243. Under the roll-out options set out below, we propose to provide expert plan-making support to a first, small cohort of around ten “front runner” authorities to prepare new-style local plans. This will ensure there is a strong foundation of learning and best practice for other authorities to draw upon.</p> <p>244. The first cohort of local planning authorities, the “front runners” could start plan-making from autumn 2024.</p> <p>245. The next key milestone would be 30 June 2025. This would be seven months after the first cohort had started, so all the first gateway assessments should have been completed and there will be learning and best practice for other authorities to draw on.</p> <p>The remaining authorities would be:</p> <ul style="list-style-type: none"> <li>• ranked chronologically by the date that they have most recently adopted a plan containing strategic priorities</li> <li>• grouped together sequentially into groups of up to 25 authorities</li> <li>• each groups allocated a 6 month plan-making commencement window (a “wave”), within which plan making should start</li> </ul> <p>246. This approach provides an even distribution and avoids a large bulge of authorities starting plan-making shortly after the new system in in place. It will also help ensure that sufficient resources are available to deliver gateway assessments and independent examinations.</p> <p><b>Alternative roll-out options</b></p> <p>247. We are interested in hearing suggestions on other ways to potentially group authorities, for instance via housing market areas, county boundaries or based on their rural or urban compositions. There would be benefits of such approaches but also administrative complexities.</p> <p>248. An additional option would be to allow authorities to begin plan-making earlier than these dates should they wish to, with the waves acting as a final ‘back stop’ by which authorities should have begun preparing their new plan. This however raises a risk of losing some of the benefits of putting authorities into waves, if high numbers decide to start in the same time period (i.e. a larger number than can be managed by the professional capacity in the sector).</p> <p><b>Proposals around protection from speculative development</b></p>	

Consultation Question	Governments Supporting Text	Council Response
	<p>249. Our December 2022 consultation <a href="#">Levelling-up and Regeneration Bill: reforms to national planning policy</a>, set out the following:</p> <p>We also intend to set out that plans that will become more than 5 years old during the first 30 months of the new system (i.e. while the local planning authority is preparing their new plan), will continue to be considered ‘up-to-date’ for decision-making purposes for 30 months after the new system starts.</p> <p>Additionally, where a plan has been found sound subject to an early update requirement, and the Inspector has given a deadline to submit an updated plan within the first 30 months of the new system going live, this deadline will be extended to 30 months after the new system goes live. This will ensure that local planning authorities are protected from the risk of speculative development while preparing their new plan.</p> <p>250. Should we go ahead with one of the roll-out options set out above, we intend to extend this transitional protection from speculative development. Once the new plan-making system is commenced, after their most recently adopted plan is five years old, for 30 months after the point at which they are required to start making their new-style local plan, authorities would be protected from speculative development (i.e. their plans would be considered up to date for decision making purposes). This is intended to ensure that local planning authorities do not face adverse consequences from being placed into a wave which would mean them beginning plan-making later than they otherwise would do.</p> <p>251. An additional option would be to allow planning authorities to begin plan-making earlier than these dates should they wish to, with the waves acting as a final ‘back stop’ by which local planning authorities must have begun their new plan. This however raises a risk of losing some of the benefits of putting local planning authorities into waves, if high numbers decide to start in the same time period (i.e. a larger number than can be managed by the professional capacity in the sector).</p> <p><b>Support for the first authorities preparing new-style plans</b></p> <p>252. As set out above, we intend to provide an enhanced support package for around 10 “front runner” authorities preparing the first local or joint local plans, minerals and waste plans or joint minerals and waste plan under the new planning system.. This will help ensure there is a strong foundation of learning for other planning authorities to draw upon, as well as helping make sure the new system gets off to a good start. We will confirm details of who can apply and how in due course, but it is likely that priority will be given to authorities with the most up to date plans. We intend to take this approach to help incentivise those with a recent record of plan-making to come forward and drive successful plan delivery in the first cohort. As we have set out previously, we expect that areas with the most up-to-date plans will be in the best position to adapt to new plan-making processes.</p> <p><b>Supporting the resilience, capacity and capability of local planning authorities</b></p>	

Consultation Question	Governments Supporting Text	Council Response
	<p>253. We recognise that many local planning authorities are facing significant capacity and capability challenges, including challenges in recruiting and retaining planning professionals and other technical experts with the right skills and experience.</p> <p>254. We want to support and work with local planning authorities to ensure they have the skills and capacity they need, and support planning departments to recruit, retain and develop planners and build a more sustainable planning system.</p> <p>255. We have introduced a Capacity and Capability programme, which will seek to provide direct support to local planning authorities that is needed now. This comprises direct funding now, delivering upskilling opportunities for existing planners, and further developing the future pipeline into the profession in order to continually improve the resilience of local planning authorities.</p> <p>256. This programme consists of a number of interventions, including a new 2-year graduate programme delivered through the Local Government Association, funding to support the national roll out of Public Practice, a social enterprise in the built environment sector, to support their work in helping local authorities to recruit and develop skills planners and built environment professionals. We have also announced an extension to the bursary scheme through the Royal Town Planning Institute (RTPI) which increases the size of the bursary from £2,000 to £5,000 for over 50 students.</p> <p>257. We have also launched the Planning Skills Delivery Fund to support local authorities to help clear the backlog of planning applications as well as providing funding to support the development of core skills needed for the implementation of the measures contained in the Levelling Up and Regeneration Bill.</p> <p>258. A national survey of local authority skills and resources has been launched for the first time and this research will enable us to have a better geographical understanding of the skills gaps and challenges across local authorities and will enable us to further target capacity and capability support.</p>	
<b>Saving existing plans and planning documents</b>		
<p><b>Question 42: Do you agree with our proposals for saving existing plans and planning documents? If not, why?</b></p>	<p>259. This chapter of the consultation document sets out what will happen to existing Development Plan Documents, adopted under the Planning and Compulsory Purchase Act 2004 and historic polices saved under Schedule 8 to the 2004 Act, following the implementation of the reforms set out in the Levelling Up and Regeneration Bill.</p> <p>260. We proposed in our December 2022 consultation <a href="#">Levelling-up and Regeneration Bill: reforms to national planning policy</a> that plan makers will have until 30 June 2025 to submit their local plans, neighbourhood plans, minerals and waste plans, and spatial development strategies for independent examination under the existing legal framework; this will mean that existing legal requirements and duties, for example the Duty to Cooperate will still apply to those documents.</p> <p>261. We also proposed that all independent examinations of local plans, minerals and waste plans and spatial development strategies must be concluded, with plans adopted, by 31 December 2026. These plans will be examined under the current legislation.</p>	<p>For Councils who are currently working on two-part local plans (like South Derbyshire) who would usually follow the first plan swiftly with a second there should be some consideration as to how these two things will dovetail with the new single plan system. Where the first plan ceases to exist when a new style plan is adopted it will mean that either the LPA is incentivised to wait for 5 years before starting a new style plan or whether recently adopted policies in the part 1 can be carried forwards to the new style plan and then added to form a single plan. Or whether a suite of the Supplementary Plans could be used to allocate sites in advance of a new style plan being adopted.</p>

Consultation Question	Governments Supporting Text	Council Response
	<p><b>Proposed approach</b></p> <p>262. In line with our proposals for all local planning authorities to have a single local plan, we are proposing that when the new plan-making system comes into force, existing Development Plan Documents and saved policies will remain in force until the local planning authority adopt a new-style local plan. When that new-style plan is adopted, in line with the current arrangements, those existing Development Plan Documents and saved policies will automatically cease to have effect.</p> <p>263. These proposals would also apply to minerals and waste plans and to spatial development strategies.</p> <p>264. Statements of Community Involvement and Local Development Schemes should also remain in force where they relate to emerging “old-style” plans, until those plans are adopted or the deadline for their adoption passes.</p> <p>265. Separate saving provisions for Supplementary Planning Documents are proposed.</p>	
<b>Equalities impacts</b>		
<p><b>Question 43: Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010?</b></p>	<p>266. We are keen to hear about any potential impact these proposals may have on those with a protected characteristic, together with any supporting evidence and suggestions for any appropriate mitigation which can assist us in the future.</p>	<p>The Council has no comments to make.</p>

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<b>REPORT TO:</b>	<b>ENVIRONMENTAL AND DEVELOPMENT SERVICES COMMITTEE</b>	<b>AGENDA ITEM: 13</b>
<b>DATE OF MEETING:</b>	<b>21 SEPTEMBER 2023</b>	<b>CATEGORY: DELEGATED</b>
<b>REPORT FROM:</b>	<b>STRATEGIC DIRECTOR (SERVICE DELIVERY)</b>	<b>OPEN</b>
<b>MEMBERS' CONTACT POINT:</b>	<b>DEMOCRATIC SERVICES 01283 595889/5722 <a href="mailto:democraticservices@southderbyshire.gov.uk">democraticservices@southderbyshire.gov.uk</a></b>	<b>DOC:</b>
<b>SUBJECT:</b>	<b>COMMITTEE WORK PROGRAMME</b>	<b>REF:</b>
<b>WARD(S) AFFECTED:</b>	<b>ALL</b>	<b>TERMS OF REFERENCE: G</b>

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## **1.0 Recommendations**

1.1 That the Committee considers and approves the updated work programme.

## **2.0 Purpose of Report**

2.1 The Committee is asked to consider the updated work programme.

## **3.0 Detail**

3.1 Attached at Annexe 'A' is an updated work programme document. The Committee is asked to consider and review the content of this document.

## **4.0 Financial Implications**

4.1 None arising directly from this report.

## **5.0 Background Papers**

5.1 Work Programme.

## Environmental & Development Committee 21 September 2023 Work Programme

Work Programme Area	Date of Committee meetings	Contact Officer (Contact details)
<b>Reports Previously Considered by Last Three Committees</b>		
Work of the Corporate Environmental Sustainability Group	26 January 2023	Matt Holford Head of Environmental Services (01283) 595856
Authority Monitoring Report	26 January 2023	Steffan Saunders Head of Planning and Strategic Housing 07971604326
Designation of Neighbourhood Area	26 January 2023	Jessica Cheadle Planning Policy Assistant (01283) 595820
Revision to Action Plan For Nature Work Programme	26 January 2023	Christopher Worman Parks and Green Spaces Manager (01283) 595774
Toyota City	26 January 2023	Mike Roylance Head of Economic Development and Growth (01283) 595725
Corporate Plan Performance Report Q3	02 March 2023	Clare Booth Corporate Performance & Policy Officer (01283) 595788
South Derbyshire Economic Development and Growth Strategy	02 March 2023	Mike Roylance Head of Economic Development and Growth (01283) 595725
Consultation Response to Proposed Changes to the NPPF.	02 March 2023	Steffan Saunders Head of Planning and Strategic Housing

		07971604326
Corporate Plan 2020-24 Performance Report Q4	30 May 2023	Heidi McDougall Strategic Director (Service Delivery) 01283 595 775
The Department for Levelling Up, Housing and Communities Consultation On The Proposed Infrastructure Levy.	30 May 2023	Jessica Cheadle Planning Policy Assistant 07435 829964
East Midlands Airport Draft Noise Action Plan	30 May 2023	Richard Groves Planning Policy Officer 01283 595738
The Department for Levelling Up, Housing and Communities Consultation On Environmental Outcomes Reports	30 May 2023	Steffan Saunders Head of Planning and Strategic Housing 07971604326
CORPORATE PLAN 2020-24: PERFORMANCE REPORT 2023-24 (QUARTER 1 - 1 April to 30 June)	10 August 2023	Clare Booth Corporate Performance & Policy Officer (01283) 595788
Annual Enforcement Compliance Report 2022-23	10 August 2023	Matt Holford Head of Environmental Services 07891 072081
<b>Provisional Programme of Reports To Be Considered by Committee</b>		
Climate and Environmental Action Plan review	21 September 2023	Matt Holford Head of Environmental Services 07891 072081
Electric Recharge Infrastructure	21 September 2023	Matt Holford Head of Environmental Services 07891 072081
Budget Setting Approach 2024/25	21 September 2023	Charlotte Jackson Head of Finance 07770 085452
Woodville Link Road Bio-Diversity Net Gain Project Progress Update	21 September 2023	Sean McBurney Head of Cultural and Community Services 07435 935050

Membership of the Local Plan Working Group	21 September 2023	Steffan Saunders Head of Planning and Strategic Housing 07971604326
Designation of Findern Neighbourhood Area	21 September 2023	Steffan Saunders Head of Planning and Strategic Housing 07971604326
The Department for Levelling Up, Housing and Communities Consultation on Implementation of Plan-Making Reforms	21 September 2023	Steffan Saunders Head of Planning and Strategic Housing 07971604326
Fleet Replacement Plan	09 November 2023	Gary Charlton Head of Operational Services 07976 081896
CORPORATE PLAN 2020-24: PERFORMANCE REPORT 2023-24 (QUARTER 2 - 1 July to 30 September)	09 November 2023	Clare Booth Corporate Performance & Policy Officer (01283) 595788
Consultation on East Midlands Airport Sustainable Development Plan	09 November 2023	Planning Policy Team Leader (01283) 595749
Infrastructure Funding Statement 2022-23	09 November 2023	Jessica Cheadle Planning Policy Assistant (01283) 595820
Wildflower Project Report	09 November 2023	Sean McBurney Head of Cultural and Community Services 07435 935050
Statement of Community Involvement	09 November 2023	Planning Policy Team Leader (01283) 595749
Route Optimisation	09 November 2023	Gary Charlton Head of Operational Services 07976 081896
Waste Management IT System	09 November 2023	Gary Charlton Head of Operational Services 07976 081896
Gypsy and Traveller Accommodation Assessment Report	09 November 2023	Planning Policy Team Leader (01283) 595749

Local Plan Issues and Options	09 November 2023	Steffan Saunders Head of Planning and Strategic Housing 07971604326
Fixed Penalty Notice Charges	09 November 2023	Matt Holford Head of Environmental Services 07891 072081
Environmental Health and Licensing Software	09 November 2023	Matt Holford Head of Environmental Services 07891 072081
SUDs Policy Management	09 November 2023	Sean McBurney Head of Cultural and Community Services 07435 935050
Biodiversity Net Gain	09 November 2023	Sean McBurney Head of Cultural and Community Services 07435 935050
Draft 2024-25 General Fund Revenue Budget	04 January 2024	Charlotte Jackson Head of Finance 07770 085452
Draft Capital Programmes 2024-25 to 2028-29	04 January 2024	Charlotte Jackson Head of Finance 07770 085452
Draft 2024-2025 HRA Budget	04 January 2024	Charlotte Jackson Head of Finance 07770 085452
Authority Monitoring Report 2022-23	25 January 2024	Jessica Cheadle Planning Policy Assistant (01283) 595820
CORPORATE PLAN 2020-24: PERFORMANCE REPORT 2023-24 (QUARTER 3 - 1 October to 31 December)	29 February 2024	Clare Booth Corporate Performance & Policy Officer (01283) 595788
Environmental Services Commercialisation Plan review	April 2024	Matt Holford Head of Environmental Services 07891 072081

East Midlands Airport Airspace Redesign Consultation (changing the flight paths)	Estimate 2024	Planning Policy Team Leader (01283) 595749
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