<u>**AGENDA ITEM No. 12**</u>

<u>PEAK DISTRICT NATIONAL PARK AUTHORITY</u>

<u>NATIONAL PARK AUTHORITY MEETING</u>

<u>7 DECEMBER 2007</u>

<u>CHIEF EXECUTIVE</u>

<u>PART A</u>

1.   <u>**ENVIRONMENTAL MANAGEMENT POLICY, REPORTING FRAMEWORK AND OPTIONS FOR ACCREDITATION (A595/JBD)**</u>

<u>**Proposal**</u>

1   This report gives progress to date on a more structured and all-embracing approach to environmental management in the Authority and especially the actions taken pursuant to the Authority resolutions of 9 February 2007. It reports 'quick wins'; proposes an environmental policy that incorporates actions in line with our Nottingham Declaration commitment; proposes a reporting framework for environmental information; and makes recommendations for taking the programme forward.

<u>**RECOMMENDATION**</u>:

That

1.   **The established good environmental practices, including examples of best practice and recently achieved 'quick wins' in paragraphs 3-5 be noted and that lessons be learned from these**

2.   **The Environmental Policy at Annex 1 be adopted**

3.   **That the environmental monitoring framework at paragraph 8 be noted as a reasonable balance between comprehensive reporting and cost-effectiveness and that the first report be brought to Audit and Performance Committee 25 January 2008 and annually thereafter**

4.   **That the Authority's limited time and resources be focused on an 'action-based approach' to environmental management rather than an externally accredited scheme, but that we should, wherever possible benchmark ourselves against requirements of our own schemes such as EQM and our obligations under the Nottingham Declaration and other requirements on local authorities and other public bodies**

5.   **That a report be brought to the Authority no later than December 2008 on a wider strategy for addressing impacts of and adaptation and mitigation to climate change within the National Park**

6.   **That a report be brought to Services Committee 25 January 2008 setting out proposals to support the development of environmental management, in line with the Authority's allocation of financial resources of £20 000 per year for 2 years.**

7.   **That staff who have actively contributed action towards the quick wins and preparation of this report be thanked**

Key Issues

2   In February 2007, the Authority (minute reference 16/07) resolved:

1.   **That the Authority signs the Nottingham Declaration on Climate change and commits to developing an action plan based on the headpoints of paragraph 8 of the report to implement it**

2.   **That an environmental management project plan be pursued for phase 1 of the programme, targeting the collection of baseline information and the development and delivery of 'quick wins'.**

3.   **That a report be brought to the Authority in July 2007, setting out progress thus far, including:**
     -    **an Environmental Policy for the Authority**
     -    **an options analysis for taking the programme to the next stages and**
     -    **an assessment of current environmental performance based on baseline information**

With agreement from the Chairs of the Authority since that time, this work was reprioritised consequential on the unplanned departure of a member of staff and also other priority issues being more important for Authority business in July and October. Since the February Authority, the work has been taken forward by an Environmental Management Group, largely composed of staff who have willingly volunteered their time towards the actions reported below, the preparation of material in this report and the development of the Group. Other staff with particular responsibilities, such as property or finance, and teams working on relevant issues, such as the Fleet Management Group, have also made important contributions.

Starting points and quick wins

3   Good environmental management has been central to the Authority's plans and policies for many years and many staff, volunteers and members have sought good or excellent environmental management in what they do. There have been excellent examples of how our work has championed environmental management, as set out in paragraph 4 of the previous Authority report. Excellent examples of practical steps have included:

- The Eco-centre status achieved by Losehill Hall in 2003
- Biomass boiler at Losehill Hall commissioned in 2004
- Use of Liquid Propane Gas as a fuel for ranger vehicles
- A good record of recycling achieved at North Lees campsite
- Incremental improvements in environmental performance of estates and properties, especially at refurbishments (eg Moorland Centre and Losehill Hall)
- Recycled paper used as standard and 'best environmental option' chosen for all publications
- Green travel plans for major sites
- Many personal initiatives

However, all of these have happened outside of any framework for measuring their overall impacts and practices have not been consistently good. The remainder of this paper reports on how it is proposed to remedy this across the span of the Authority's activities.

4   Since committing to enhancing our environmental performance in February, the following specific actions have been achieved as further 'quick wins', building on established good practice:

- Signed the Nottingham Declaration and have joined the Nottinghamshire and Derbyshire Local Authorities Environment Programme
- Appointed a Member Representative (Anne Ashe) for climate change
- Draft Nottingham Declaration Action Plan prepared
- Environmental guidelines integrated into procurement policy and guidelines
- Incorporated environmentally friendly products in the specification and subsequent contract for Aldern House cleaning and also for some public toilets
- Included preference for EQM and locally-sourced food in the specification for the Aldern House members catering contract; it is intended to trial use of china cups instead of disposable cups for smaller meetings with suitable arrangements made for hygiene and tidiness
- Collated data and targets for mileage reduction, fleet specification changes and environmentally better fuels within the Fleet Management Group
- A 'switch-off' campaign at Aldern House and Losehill Hall and related monitoring
- 'Top Ten' tips incorporated in wage slip notification
- Low energy light bulbs are being introduced as a long term alternative for Aldern House, subject to practicability and use of existing stock of conventional bulbs
- Introducing recycled jute bags as an alternative to plastic bags in all visitor centres (but where plastic bags are necessary, will be recycled plastic)
- Commitment to a sustainability plan for the ANPA conference, minimising paper, on-line booking and report publication, low – emission conference transport and local food sourcing
- Comprehensive audits of energy, waste and water use at all sites and a printing and paper use audit at Aldern House
- Waste Reduction Action Plan being prepared for top ten major sites

5 A number of other potential quick wins have been investigated, but are proving longer term or more difficult and/or costly. These will be pursued further over the next phase of environmental management and include:

- Recycling of litter and waste collected at main office and other locations is problematic as our current arrangements allow for free disposal of litter to landfill. A much more desirable option would be for a greater proportion to be recycled but as a business we would need to pay for this. Some work has been done to consider this for Aldern House but planning issues, cost and practical issues will need to be addressed in the Waste Reduction Action Plan

- An audit of facilities management at Aldern House has identified up to £75 000 investment in eg renewable energy, rainwater harvesting and other environmental improvements, but this has not yet been prioritised for expenditure

- Investment in our property portfolio generally is at insufficient levels currently and this has knock-on consequences for environmental improvements. The new Head of Property has resolving this as a priority for the service, but it is likely to be a medium term task, combining business planning and external funding

- A range of improvements have been made to how planning officers handle the sustainability of applications; planning reports have a standard item on sustainability; planning officers have been on training sessions with RTPI and sustainability is an important emerging issue within the LDF

- Using the procurement policy as a guideline, Visitor Services team are preparing a long term plan for substituting more product lines with more environmentally friendly alternatives, but as these services have considerable challenges in managing suppliers and income targets this cannot be achieved quickly

- The Fleet Management Group are looking into a variety of means to reduce business miles and CO2 emissions through modernising and changing the specification of vehicles, investigating alternative fuels and looking at factors such as driver training and vehicle management

- New investment and upgrading in office equipment will allow greater control over printing and photocopying to ensure more efficient practices and the Administration and Support project (part of the Organisational Development) is trialling more efficient and paperless processes, with a pilot in Planning Service

- Reducing the amount of print work produced by the authority by ensuring all printed material is targeted towards achieving one of the authority's priorities/outcomes; avoiding 'vanity publishing'; avoiding the use of dates on printed material that can lead to some leaflets, posters etc being disposed of earlier than they would otherwise need to be; and developing our website as a communication tool to avoid the need for printing documents.

A National Park Authority Environmental Policy

6   Whilst the actions described in paragraphs 3, 4 and 5 are important in their own right, there is a need for a clear, widely shared and visionary policy. This must reflect the purpose and distinctive nature of the Authority, encapsulate actions in pursuit of the Nottingham declaration and other statutory requirements; foster best practice; set standards for behaviours; and set SMART (Specific, Measurable, Attainable, Realistic and Timely) targets. A proposed NPA policy is set out at annex 1. This is based on some examples of best practice from across the public sector, tailored to our specific needs. It includes a range of measures that will be within a more complete Nottingham Declaration Action Plan but also covers a range of environmental management issues beyond climate change issues. It also includes a range of measures where our intention is to have SMART targets, based on the environmental monitoring framework set out in paragraph 7 below. The accurate and regular collection, storage and reporting of some of these data is costly and open to interpretation and so there are three key issues to consider in setting SMART targets:

- The costs of collecting data versus the likely benefits of taking action to meet specific targets
- The reliability of data
- Variability in data not linked to active reduction programmes (such as heating costs that may be weather dependent)

Taking into account these factors, we recommend the setting of some targets within the Environmental Policy but have decided against targets in other areas. For example, having completed a waste audit and benchmarked with other organisations (through ENCAMS) we are reasonably clear that we can set targets for waste reduction going to landfill from Aldern House. This is more difficult for a range of other facilities and so at this stage we are unable to do so for all NPA-generated waste. Our judgement is that setting precise targets for water usage would be costly to measure in relation to the cost and environmental benefits of water saved, but that we should have SMART targets for CO2 emissions from business travel and work towards them for energy use across the Authority. Thus, the policy includes some SMART targets (eg waste at Aldern House), some outputs and plans (such as on waste reduction and property), some more specific commitments (such as on mineral use) and some general aspirations (such as establishing a composite carbon footprint). The intention is that the policy will be reviewed annually at Audit and Performance Committee on the basis of an agreed monitoring framework. It is proposed that, once the framework has been agreed at this

Authority, the currently available data will be presented to the next Audit and Performance Committee in January 2008 in that format. Therefore, targets agreed in the current policy may be considered provisional and revised once more data is presented.

7   To a very great degree, the Environmental Policy will cover commitments we have made in the Nottingham Declaration and it is structured along the lines of the Declaration itself. Officers have drafted a proposed Nottingham Declaration Action Plan and are pursuing actions in line with it. However, climate change is a much larger issue, covering:

- Analysis of the impacts – especially in relation to the whole National Park environment
- Adaptation – considering issues such as land use, visitor management and ecological issues
- Mitigation – covering energy conservation, renewable energy and carbon management in moors and woodlands

The Authority has appointed a Member Representative to help co-ordinate all of our actions on this and new appointments create the capacity to plan action on climate change more holistically. Legislative requirements on local authorities and all public bodies are becoming clearer with National Performance Indicators, Guidance from Defra and DBERR (Department for Business, Enterprise and Regulatory Reform) and the Climate Change Bill. It is therefore proposed that, no later than December 2008, a full Climate Change Action Plan is brought to the Authority covering the full scope of this major challenge.

Environmental Monitoring Framework

8   The data available has been largely gathered during 2007 inasmuch as it can be through a variety of processes. The following is a summary of the data available that will be presented more fully at Audit and Performance Committee

Waste – baseline data almost complete
- Waste audit of Aldern House completed in September 2007
- Collation of waste statistics across PDNPA sites (car parks, campsites etc) complete for 2007 as baseline and annual overall tonnages for previous 3 years
- Baseline data available as tonnes of waste per year from 10 major sites and other minor sites and baseline waste audit from some of the major sites

Energy – baseline data partially complete
- Key to working out PDNPA's carbon footprint and preparation for new national indicator NI 185 (CO_2 reduction for Local Authority operations)
- Data collection from PDNPA sites underway - work prioritised by size / energy use
- Obtaining electricity and gas readings for a 12 month period during 2006/07 in order to obtain baseline energy use figures and will cross check with already centrally logged all our energy use on the accounts system where we allocate out the climate change levy to a separate code which allows the total C02 emissions figure to be arrived at globally for all energy used as the levy is payable based on kilowatt hours for gas & electricity.

Water – baseline data partially complete
- Data collection from PDNPA sites underway – work prioritised by size / water use
- Obtaining water readings for a 12 month period during 2006/07 in order to create baseline water use

Printing – baseline data being obtained

- IT recording monthly printing trends across Aldern House from September 2007
- Exploring ability to calculate % of documents printed double sided
- Discussing suitable target for reduction in pages printed

Photocopying – baseline data being obtained
- Recording monthly photocopy figures across Aldern House & Losehill Hall
- Exploring ability to calculate % of documents printed double sided
- Discussing suitable target for reduction in pages photocopied

Mileage – baseline date obtained for 2005/06
- Good work from Vehicle Working Group led by Philip Naylor
- Grey fleet and PDNPA vehicle mileage collected for 2005/06 (246,724 miles travelled, 215.4 tonnes of CO_2 emitted)
- Based on estimates of 2007/08 activity (the national indicators will ultimately require a 2008/09 as baseline) this provides a C02 reduction target of at least 25% - 30% of our current level by the end of the fifth year, monitored annually

Options Appraisal for Future Development of Environmental Management

9   Environmental management is a way of describing all of the activities undertaken by an organisation in order to reduce the impact of its activities on the environment. According to the environmental management standard ISO 14001, environmental management may be considered to comprise active pollution prevention, legal compliance and ongoing environmental improvement. An environmental management system is a structured and usually documented approach to environmental management. There are a plethora of management systems now available, which organisations can use to structure the activities they undertake to reduce their impact on the environment.   These are summarised in table 1 below and in annex 2

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Table 1 Summary Evaluation of Environmental Management Options

Option	Detail	Time commitment	Cost
ISO 14001	The international standard for environmental management. Involves a set of written standards against which an organisation can be certified by a third party. Fairly complex and focused on documented management procedures. Developing the procedures would involve significant officer time.	High.	High e.g. £3000 for an initial assessment and an annual fee of £2000.
EMAS (Eco-Management and Audit Scheme)	European standard for environmental management. Similar to ISO 14001 but with additional requirement for public reporting	High	High
Acorn	A 6 step approach to achieving ISO 14001/ EMAS	Medium to high	High
Green Dragon.	Similar stepped structure to Acorn but more practical, flexible and less documentation-focused. Additional requirements for sustainability, supply chain, and greenhouse gas objective and targets. All Welsh National Parks have achieved stages 3 or 4. External verification is required, with the associated costs.	Medium to high	High
Natural Step & Project Sigma	Two sustainability management systems endorsed by Forum for the Future. Favoured by blue-chip companies such as BP, Sainsburys, Co-operative Bank and Yorkshire Water. Not designed to be certifiable standard. Not tested in Local Authority or National Park context.	Unknown	Unknown.
Nottingham Declaration framework/toolkit	Designed to help structure activity to reduce impact on climate change in three key areas: • The management of our own estate • Our activities as a service provider	Low	Low

	• Our role as a community leader. The Action Pack is free and no external verification is required to meet its requirements. However, mainly focused on the single issue of climate change, rather than being an all embracing environmental or sustainability management system.		
The Peak District Environmental Quality Mark	Certification Mark awarded by PDNPA to businesses that help conserve and enhance the Peak District National Park. Businesses have to meet a set of Standards to deliver environmental best practice and conservation benefits to the Peak District National Park. The Authority would not be able to award itself this certification mark. However, it would perhaps be appropriate to undertake a benchmarking exercise to verify that as an organisation we meet environmental the Standards that we judge local businesses against.	Low	Low
North York Moors NP – "An Action-based Approach"	Active choice not to adopt any structured management systems but instead focus activities on delivering environmental improvement.	Medium	Medium – but entirely focused on delivery

11   The 'traditional' environmental management systems such as ISO 14001 receive criticism for being complex, bureaucratic, narrow and not guaranteeing performance improvements. Although Green Dragon is a more flexible approach, which has been tested in a National Park Authority context, the cost of external verification is significant and this resource could be spend on direct environmental improvements. The more recent 'sustainability management ' systems do not involve external verification costs, but they are untested in a National Park Authority context and may involve significant officer time (thus cost) to adapt the principles to the Authority's needs.

It would be prudent to spend time and resources acting, rather than developing documented systems i.e. to adopt an 'Action-based approach'. As an organisation of environmental professionals, we have in-house expertise to identify the areas that need further action to achieve good and best environmental practice. We can then target these areas for action. It is also recommend that we benchmark ourselves against requirements of EQM and also ensure out activity meets our obligations under the Nottingham Declaration.

Further development of the Environmental Management Group

12   It is proposed to use the £20 000 per year allocated in the Authority's budget for 2 years from April 2008 to:

- Maintain the Environmental Management Group as a team of expert and service-based staff, but supplement this with a more focused central resource to co-ordinate this work

- Pursue the Action-based approach to environmental performance in line with recommendation 4

- Continue monitoring Authority environmental performance – working to implement the ongoing systematic collection and reporting of this data according to the framework and recommendations set out in paragraph

- Develop action plans based on the monitoring data obtained – liaising and supporting relevant services with the implementation of these action plans

- Environmental management training and awareness raising amongst Authority staff, volunteers and members to support change in working practices towards better environmental outcomes

- Communication of environmental management progress within the Authority and to external stakeholders as appropriate

- Using external networks and practical experience of the Authority's performance to influence and spread best practice amongst similar organisations

A full report will be brought to Services Committee 25 January 2008 with proposals to do this.

APPENDIX

BACKGROUND

Resources

13   To date, a limited amount of the Authority's resources have been used with work completed either through a small project team, a small amount of paid overtime (no more than £3000 in 2007/8) and work being done for other purposes, such as the Fleet Management Group. The proposal in this paper is to ensure that there is a central resource to ensure the work is developed comprehensively for 2008/9 and 2009/10.

Risk Management

14   There are a number of risks that will be managed:

- That the policy is insufficient in encompassing all matters related to our environmental impact
- That insufficient staff are aware of their particular duties and roles in implementing the policy
- That the Authority's reputation as an environmental body is harmed by actions that fall short of the policy

Human Rights, Equalities, Health & Safety

15   An Equalities Impact Needs Assessment has been completed for the proposed policy and no significant issues have been raised as a result. No other issues are considered significant.

Consultees

16   The Environmental Management Group, Fleet Management Group, Heads of Service, Natural Environment Team Leader, Chief Finance Officer, Head of Law and Management Team

Enclosures

17   None

List of Background Papers (not previously published)

18   None

Report Author

19   Jim Dixon

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20   29 November 2007