

Annex 3: Environmental Sustainability Strategy Scrutiny Panel Suggested Changes and officer responses

Document	Reference	Comment	Response	Change proposed
Strategy	Foreword	This section is blank	This section will be completed with a Foreword from the Portfolio Holder once the document has been approved	No
Strategy	Para 2, various other instances	Whether 'climate crisis' is an appropriate term to use; or whether an alternative term (eg climate change or climate emergency) should be used	Climate crisis is considered to be an appropriate term; no change to strategy required.	No
Strategy	Section 1.2	Clarify that Council net zero target is for scope 1 and 2 emissions; also include reference to scope 3 approach	Amend bullet points as follows: “ - the target to get to net zero carbon by 2030 for the Council (<u>scope 1 and 2 emissions</u>); - <u>The aim to achieve net zero for scope 3 emissions as soon as possible after 2030...</u> ”	Yes (Strategy)
Strategy	Section 1.5	Strategy should include recognition of uncertainty surrounding future of the Harlequin Theatre	Add footnote as follows: “ <u>At the time of writing, the Harlequin Theatre is shut, but it remains in the carbon footprint baseline and Scope 1 and Scope 2 Harlequin activities that are undertaken elsewhere will be reported in the 2023/24 carbon footprint and annual report.</u> ”	Yes (Strategy)
Strategy	Section 1.5	Business as usual options should also have their sustainability 'costs' considered	This already happens and is covered by Action 86, no change to strategy required.	No
Strategy	Section 2	Wording about the number of themes could be clarified	Amend as follows: “...however we now believe that this needs greater emphasis and therefore include it in this 2024 update as a <u>fourth environmental fifth</u> theme”	Yes (Strategy)
Strategy	Section 3.1	Consider a specific 2050 target for net zero scope 3 emissions	A flexible approach is considered appropriate until we have better baseline evidence; current approach allows for action to reach net zero scope 3 <i>before</i> 2050. No change to strategy required.	No
Strategy	Section 3.2	Consider adding reference to moving away from gas heating as well as exploring potential for renewable gas tariff	Amend as follows: “At the Council level, we switched to a renewable energy tariff for our electricity in 2023. When the contract comes up for renewal, we will explore options to also procure a renewable gas tariff <u>as an interim measure while we work to reduce gas consumption</u> ”	Yes (Strategy)
Strategy	Section 4.1	Add timeframe to units of water consumption	Amend: “...litres per person/ <u>per day</u> ...”	Yes (Strategy)
Strategy	Section 4.1	Reference to water consumption could be confusing, we should use clear language as this could be misinterpreted as the amount of water we drink	Amend: “In terms of water <u>use consumption</u> , Reigate & Banstead borough...”	Yes (Strategy)

Strategy	Section 4.2	Correct date typo	Amend: “...October 20203 2023”	Yes (Strategy)
Strategy	Section 4.2	Question whether we should also seek to work with Thames Water as well as SES Water, specifically should we lobby them in relation to leaks and safe discharge into waterways	Action 72 covers lobbying, this has been expanded as follows: “Alone and in partnership, continue to lobby government <u>and other bodies to support local sustainability objectives and ensure local authorities have the powers and resources to facilitate change</u> ” Officers will also investigate working with Thames Water in relation to water usage more generally.	Yes (Action Plan)
Strategy	Section 5.1	[Advance question] Impact from human activity has been happening since the industrial revolution	Amend as follows: “ Over recent decades Impact from human activity through pollution, habitat loss and fragmentation <u>has have</u> caused stress to the natural environment <u>accelerated during the Industrial Revolution and continues to this day...</u> ”	Yes (Strategy)
Strategy	Section 5.1	The stated area of council owned and managed land is incorrect; reference to Banstead Woods as a LNR is missing	Amend: “The Council owns and manages approximately 1,250 hectares of countryside, including internationally rare lowland heath and chalk grassland. <u>This includes The Council also owns two three</u> Local Nature Reserves (LNRs) at <u>Banstead Woods, Reigate Heath and Earlswood Common</u> ”	Yes (Strategy)
Strategy	Section 7.3	As well as procuring food sustainably, can we do more do more to educate people (including via schools) and help minimise food waste?	The Council already works closely with Surrey Environment Partnership to promote a reduction in food waste, and food waste recycling. Amend Action 69 to include specific reference to our work with Surrey Environment Partnership to deliver waste and recycling comms messages.	Yes (Action Plan)
Strategy	Section 7.5	The strategy could be clearer about the review date, rather than providing a time range	Amend as follows: “This version 2 is the first review of the Strategy to do this. <u>It is intended that Version 2 should be reviewed in 2027 and no later than 2029</u> ”	Yes (Strategy)
Action Plan	General	Question whether ‘ongoing’ activity (which might be BAU) should be included within the Action Plan	Ongoing actions tend to relate to activity that – once commenced – will be delivered as business as usual. It is considered important that this is captured in the Action Plan so a complete picture of activity is presented.	No
Action Plan	General (timeframes column)	Concern about whether there is sufficient clarity over how progress on ‘ongoing’ actions will be tracked, monitored and reported against.	Ongoing actions tend to relate to activity that – once commenced – will be delivered as business as usual. Start dates have now been clarified for all ongoing actions, with changes made to the following actions: - 2, 10, 17, 19, 24, 26-28, 31, 34, 38, 43, 52-55, 59, 61, 62, 64, 66, 69, 72, 82-84	Yes (Action Plan)

			Progress against ongoing actions will be reported in the annual report each year commencing for the 'start' year (ie not <i>just</i> in the start year), using the performance indicators provided.	
Action Plan	General (performance indicators column)	Concern about a lack of quantifiable targets and indicators for some actions and therefore how progress is measured.	Performance indicators for all actions are included. Given the nature of some actions, it is not possible to set quantifiable targets for them – where this is not the case, narrative updates will be provided via the annual reporting process. Following the Panel meeting, PIs have been reviewed and tightened up where possible – this has included changes to indicators for the following actions: - 1-6, 7-10, 12-15, 16-19, 20-27, 29, 30, 31, 33, 34, 35-38, 39, 41, 43, 44-46, 47-49, 50-52, 53, 55, 56-60, 61-63, 64, 65, 66, 67, 69, 70-72, 73-77, 78-80, 81-83, 85, 86-89, 91 plus objective 13.	Yes (Action Plan)
Action Plan	General (reporting)	Can a more detailed trajectory / milestones for how the key identified actions will move us to net zero be included to assist members in tracking progress?	The importance of helping members to understand progress is acknowledged. However as noted in the covering report provided to the Panel, when it comes to buildings in particular, there are complex interrelationships between interventions that mean that quantifying the impact of individual measures in advance is unreliable and potentially misleading. More information has now been provided in the O&S Committee / Executive covering report about this, including to help members visualise the impact of relevant actions to reduce vehicle fuel emissions and gas use in our buildings. Where possible, more detailed trajectory graphs will be included in future annual reports as more detailed business cases for the key interventions listed in the covering report are developed.	Yes (covering report)
Action Plan	General (reporting)	There would be value in highlighting to members what the critical projects are that we need to achieve, and the risks associated with them	<u>Critical projects:</u> The covering paper provided to the Panel provides information about the key critical actions that are required to achieve the Council's 2030 net zero target, along with the main constraints, challenges and risks to delivering these. As noted above, more information has now been provided in the O&S Committee / Executive covering report about this, to help members visualise the impact of key actions to reduce vehicle fuel emissions and gas use in our buildings. <u>Risks:</u> A summary of the constraints to delivery, and delivery challenges, is also included in the Strategy document at section 1.5 and Chapter 9. As set out in the covering report to	Yes (covering report)

			the Panel at para 60 these will be kept under review and escalated to operational risks should the need arise. The annual report process also provides the opportunity to highlight any new risks and how already identified risks are being controlled and/or mitigated	
Action Plan	Action 2	Does this action refer to heating alone; are we working towards no gas?	To achieve net zero we need to work towards reducing gas use as much as possible. See comment above, this will be clarified in the strategy document	Yes (Strategy)
Action Plan	Action 5	Targets should be included.	The Council's capital programme sets out the years in which funding is allocated to specific buildings. Once funding has been agreed, a programme of works will be developed.	No
Action Plan	Action 6	Targets should be included.	The action is to undertake investigation. Once this has been completed a programme will be able to be developed	No
Action Plan	Action 7	Target should be included to work with groups in all areas	Action wording can be amended for clarity to explain that it will apply ' <u>...across the borough</u> ', however not appropriate to have a target for delivery in all areas as dependent on third parties	Yes (Action Plan)
Action Plan	Action 9	Question whether this was a past objective now nearing completion	Funding has been secured but the project has not been implemented	No
Action Plan	Action 10	Concern whether this action (about the provision of information) will lead to change	This action will be delivered in conjunction with Action 3, which relates to physical changes to buildings. No change to Action Plan required.	No
Action Plan	Action 14	Question whether this replicates Actions 5 and 6	This action relates to renewable energy; Actions 5 and 6 relate to energy efficiency measures	No
Action Plan	Action 20	Targets should be included.	The action is to prepare a strategy – this will include more detail about our approach including any targets	No
Action Plan	Action 27	Words such as 'encourage' and 'consider' could be stronger	The action will be implemented via a policy review, which will explore which options are most appropriate to pursue	No
Action Plan	Action 33	Target should be included to ensure coverage across all areas	Action wording can be amended for clarity to explain that it will apply ' <u>...across the borough</u> ', however not appropriate to have a target for delivery in all areas as dependent on third parties	Yes (Action Plan)
Action Plan	Action 37	Should the Council be doing more to engage with schools in relation to waste reduction and recycling?	The Council can work with Surrey Environment Partnership to promote awareness of waste & recycling including at schools (see change proposed above)	Yes (Action Plan)
Action Plan	Action 39	Not clear how some elements of this action be achieved	Action wording can be amended for clarity, to explain: ' <u>...providing advice supporting</u> residents to soft landscape their gardens' and ' <u>...promotion recognition</u> of advice in the Climate Change SPD..' ' <u>... review potential</u> to subsidise water butts for residents.'	Yes (Action Plan)

			And in recognition of comment under Strategy Section 4.1 the main action wording can be amended for clarity: '... initiatives to reduce water consumption <u>use</u> and implement water substitution ...'	
Action Plan	Action 45	Targets should be included	The action is to undertake a review. As part of this consideration will be given to the appropriateness of numerical targets.	No
Action Plan	Action 46	Targets should be included	The action is to undertake a review. As part of this, consideration will be given to the appropriateness of numerical targets	No
Action Plan	Action 48	Could make reference to working with third parties	This action is specific to land in council management; however, if successful, consideration will be given to rolling it out more widely	No
Action Plan	Action 50	Should the Council be doing more to recognise the need to work with third party landowners on nature and biodiversity issues?	This will be covered by the Green Infrastructure Strategy which is currently being reviewed by the Planning team and is mentioned in section 5.2 of the Strategy document	No
Action Plan	Action 50	What opportunity is there for large-scale woodland planting (eg in the Banstead Woods area)?	Opportunities such as this will be considered as part of the Greenspaces and Tree Strategies referred to at Actions 47 and 50	No
Action Plan	Action 55	Could make reference to working with other third parties	Partners column of action plan can be amended to recognise other local interest groups	Yes (Action Plan)
Action Plan	Action 56	Targets should be included	The action is to undertake a review. As part of this consideration will be given to the appropriateness of numerical targets	No
Action Plan	Action 57	Compliancey/targets should be included	The action is to undertake a review then implement as appropriate. Review is required first to understand options, compliancey and consider potential targets	No
Action Plan	Action 69	Will the Council consider partnerships with private providers to deliver strategy objectives	Potentially these kind of partnerships will be considered, subject to procurement and other best value requirements. Action 69, 'Partners' column has been amended to reflect this.	Yes (Action Plan)
Action Plan	Actions 73-75	More detail and targets are needed	Actions relate to the Local Plan which is subject to a separate timetable and process. The outcomes of this process cannot be pre-determined.	No
Action Plan	Action 79	Procurement documents should contain sustainability targets rather than considerations	A very wide range of products and services are procured across the Council; in some cases targets will be applicable but not necessary for all procurements. However consideration of sustainability options and opportunities is essential	No

Action Plan	Potential new action	The previous Action Plan included an action about pesticide reduction. Could this be considered for inclusion in the new plan?	Action 56 wording can be amended to be more comprehensive about the chemicals used across the organisation and to specifically refer to the pesticide glyphosate: ' Review the environmental impact of currently used cleaning chemicals ... <u>to include:</u> - Continue to minimise the use of glyphosate.'	Yes (Action Plan)
Objectives	Priority 3	Could the objective be extended to make reference to community transport as this is much needed in some areas?	No change proposed – priority relates to minimisation of emissions from transport rather than the type of services provided locally	No
Objectives	Objectives 11 and 12	These objectives have been changed to 'improve' rather than 'increase' tree planting and soft landscaping. Should consider a return to 'increase'	The term 'improve' does not preclude an increase in tree planting and soft landscaping but recognises the nuances associated with land and woodland management, including the benefits that enhancing quality (as well as quantity) can bring, and also the challenges the borough faces in dealing with Ash Die Back and similar. Use of the term 'improve' is therefore considered more appropriate.	No

Questions to follow up with written answers

How many AQMAs does the council have, have some been revoked, why and what is the process for doing so?

The Council currently has 9 Air Quality Management Areas (AQMA's), which have been in place from between 2003 to 2013. Following completion of the Air Quality Action Plan (AQAP) and Strategy, recently submitted in draft to Defra, it is proposed to un-declare 7 of these AQMA's. This is because there has been a clear downward trend in air pollutant concentrations, particularly when evaluated over a number of years (including pre-Covid), that is well evidenced at these Areas. Having considered the Defra criteria for un-declaring an AQMA, and taking a more cautious approach still, this is now felt to be the appropriate course of action.

An AQMA is un-declared by the issue of a Revocation Order made under the Environment Act 1995. Prior to this, it is however proposed to take the following steps;

- Receive and incorporate any feedback from Defra on the draft AQAP & Strategy
- Undertake a public and member consultation on the proposals, including the contents of the AQAP & Strategy
- Take the final AQAP & Strategy to Executive for sign off and approval of the Revocation Order.'

Are the greenspaces and tree strategy a single strategy or separate? Will members get to see the greenspaces strategy content? What will the scope be (ie land within our ownership or wider)?

It is intended that they will be separate strategies. Consultants are in the process of being procured. The strategy will be developed in line with the operational strategy guidance that was prepared earlier this year and will be shared with members in accordance with that document. The focus will be land within Council ownership.

Who is in the sustainable business group and what is it doing?

The sustainable business group is a group of large employers who are sharing best practice on their sustainable journeys. Companies who attend the group include:

- Santander Consumer Finance
- Gatwick Airport
- Raven Housing Trust
- Southern Gas Networks
- Lactalis
- Surrey County Council
- First Community Health

The group is a way of us sharing relevant content with the group and the group discussing and sharing any successes or challenges. We have other channels to talk with smaller businesses. Some examples of discussion topics are how to embed sustainability with staff in an organisation, low carbon fleet considerations, and green social prescribing.

Which authority (RBBC or SCC) has responsibility for weedkilling on pavements?

It is mainly the responsibility of SCC to control weeds on pavements.