

Aberdeenshire
COUNCIL



SUSTAINABILITY COMMITTEE

WEDNESDAY, 15 JUNE 2022 at 10.15 am

Your attendance is requested at a meeting of the **SUSTAINABILITY COMMITTEE** to be held by **VIRTUAL MEETING - TEAMS**, on **WEDNESDAY, 15 JUNE 2022**, at **10.15 am**.

This meeting will be live streamed and a recording of the public part of the meeting will be made publicly available at a later date.

Tuesday, 7 June 2022

Director of Business Services

To: Councillors S Dickinson (Chair), J Gifford (Vice-Chair), S Brown, P Johnston, F Joji, A Kloppert, S Payne and I Taylor

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B U S I N E S S

1	Sederunt and Declaration of Members' Interests	
2(A)	Public Sector Equality Duty Consider, and if so desired, adopt the following resolution:-	3
	(1) to have due regard to the need to:-	
	(a) eliminate discrimination, harassment and victimisation;	
	(b) advance equality of opportunity between those who share a protected characteristic and persons who do not share it; and	
	(c) foster good relations between those who share a protected characteristic and persons who do not share it.	
	(2) where an Integrated Impact Assessment is provided, to consider its contents and take those into account when reaching a decision.	
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PUBLIC SECTOR EQUALITY DUTY – GUIDANCE FOR MEMBERS

What is the duty?

In making decisions on the attached reports, Members are reminded of their legal duty under section 149 of the Equality Act 2010 to have due regard to the need to:-

- (i) eliminate discrimination, harassment and victimisation;
- (ii) advance equality of opportunity between those who share a protected characteristic and persons who do not share it; and
- (iii) foster good relations between those who share a protected characteristic and persons who do not share it.

The “protected characteristics” under the legislation are: age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; sexual orientation; and (in relation to point (i) above only) marriage and civil partnership.

How can Members discharge the duty?

To ‘have due regard’ means that in making decisions, Members must consciously consider the need to do the three things set out above. This requires a conscious approach and state of mind. The duty must influence the final decision.

However, it is not a duty to achieve a particular result (e.g. to eliminate unlawful racial discrimination or to promote good relations between persons of different racial groups). It is a duty to have due regard to the need to achieve these goals.

How much regard is ‘due’ will depend upon the circumstances and in particular on the relevance of the needs to the decision in question. The greater the relevance and potential impact that a decision may have on people with protected characteristics, the higher the regard required by the duty.

What does this mean for Committee/Full Council decisions?

Members are directed to the section in reports headed ‘Council Priorities, Implications and Risk’. This will indicate whether or not an Integrated Impact Assessment (IIA) has been carried out as part of the development of the proposals and, if so, what the outcome of that assessment is.

An IIA will be appended to a report where it is likely, amongst other things, that the action recommended in the report could have a differential impact (either positive or negative) upon people from different protected groups. The report author will have assessed whether or not an IIA is required. If one is not required, the report author will explain why that is.

Where an IIA is provided, Members should consider its contents and take those into account when reaching their decision. Members should also be satisfied that the assessment is sufficiently robust and that they have enough of an understanding of the issues to be able to discharge their legal duty satisfactorily.

For more detailed guidance please refer to the following link:-

https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.equalityhumanrights.com%2Fsites%2Fdefault%2Ffiles%2Ftechnical_guidance_psed_scotland.docx&wdOrigin=BROWSELINK

ABERDEENSHIRE COUNCIL

SUSTAINABILITY COMMITTEE

SKYPE MEETING, 16 FEBRUARY, 2022

Present: Councillors I Taylor (Chair), I Davidson (Vice-Chair), N Baillie, R Cassie, S Dickinson, M Ford, A Kloppert, A Ross and A Wallace.

Officers: Head of Service (Transportation), Team Leader (Environment and Sustainability), Planning Service Manager (Planning and Economy), Sustainable Development Officer, all Environment and Infrastructure Services; Business Partner, Finance (Moirra Beverly), Principal Energy Management Engineer (Property & Facilities), Solicitor (Lynsey Kimmitt) and Senior Committee Officer (Niall David), all Business Services.

1. DECLARATION OF MEMBERS' INTERESTS

The Chair asked Members if they had any interests to declare, in terms of the Councillors' Code of Conduct. No interests were declared.

2. PUBLIC SECTOR EQUALITY DUTY

In making decisions on the following items of business, the Committee **agreed**, in terms of Section 148 of the Equality Act 2010:-

- (1) to have due regard to the need to:-
 - (a) eliminate discrimination, harassment, and victimisation;
 - (b) advance equality of opportunity between those who share a protected characteristic and persons who do not share it; and
 - (c) foster good relations between those who share a protected characteristic and persons who do not share it; and
- (2) to consider, where an equality impact assessment has been provided, its contents and to take those into consideration when reaching a decision.

3. MINUTE OF MEETING OF THE SUSTAINABILITY COMMITTEE OF 10 NOVEMBER, 2021

On consideration of the circulated Minute of Meeting of the Committee of 10 November, 2021, Members **agreed** to approve it as a correct record.

4. PROGRESS WITH OUTSTANDING ACTIONS FROM PREVIOUS MEETINGS

There was circulated a report by the Director of Environment and Infrastructure Services, which updated Members on progress with actions agreed at previous meetings of the Sustainability Committee held since 19 May, 2021.

After consideration, the Committee **agreed**:-

- (1) to note the current position in respect of the actions arising at previous meetings; and
- (2) that those actions which had been completed be removed from the list.

5. ROUTE MAP TO 2030 ARCADIS PRESENTATION

The Committee received a presentation from Mr Paul Bekkers and Mr Rob Banes, both Arcadis, which provided a development update on the Route Map to 2030.

The presentation highlighted that the current position was in the middle of delivering Phase 2 of the Council's Zero Carbon Road Map. The presentation included a summary of 2022/23 planned and current opportunities, CO₂e reduction and estimated costs.

The presentation concluded by explaining that a bottom-up and top-down approach to developing the future carbon budget was being taken.

The Committee **agreed** to concur with the Chair in thanking Mr Bekkers and Mr Banes for an informative presentation.

6. ROUTE MAP 2030 DEVELOPMENT UPDATE

There was circulated a report dated 5 February, 2022, by the Director of Environment and Infrastructure Services which provided an update on progress with regard to the Route Map 2030 development that Aberdeenshire Council officers had been working on with the support of consultants. The project was looking at what was required across the Council to reach its 75% reduction in emissions by 2030 target.

The report reminded Members that Carbon Dioxide Equivalent (CO₂e) emissions and financial estimates were being made for all projects identified. A part of this work a toolkit was being developed to identify a complete view of decarbonisation progress against planned CO₂e reduction. This included a review of the capital/revenue impact and cost effectiveness (£/tCO₂e) of each reduction project so that the Council could analyse the impact on the overall budget and prioritise project selection. In parallel to this work, the team was also working on the draft Carbon Budget for 2022-23 which had been developed with a current list of projects totalling an estimated 1626 tCO₂e saving. It was being brought to the Sustainability Committee for consideration before going to the meeting of Aberdeenshire Council on 9 March, 2022.

Following discussion, the Committee **agreed** to acknowledge:-

- (1) the Route Map 2030 Development Update (Appendix 1); and
- (2) the proposed draft Carbon Budget 2022-2023 (Appendix 2).

7. CALL FOR VIEWS SUBMISSION: FINANCING AND DELIVERING A NET ZERO SCOTLAND

There was circulated a report dated 2 February, 2022, by the Director of Environment and Infrastructure Services which detailed the Council's response to the Scottish Parliament's Call for Views on "The Role of Local Government and its Cross-Sectoral Partners in Financing and Delivering a Net Zero Scotland".

The report explained that a comprehensive response from a number of officers was collated and demonstrated examples of good practice already in place but also the challenges facing local authorities in being able to fully support and embed the delivery of a Net Zero Scotland.

The report highlighted that the inquiry aimed to seek out the main barriers at a local level to Scotland reaching its net zero targets. It would consider what practical steps Councils were taking to break them down, in partnership with business, the voluntary sector, and local communities. It would also highlight areas where change would be needed if Councils were to play a full role in the helping us achieve the goal of a Net Zero Scotland.

The report concluded by explaining that the Council was able to provide a comprehensive response which demonstrated examples of good practice already in place but also the challenges facing local authorities in being able to fully support and embed the delivery of a Net Zero Scotland. The full response to the consultation was included as an appendix to the report.

Following discussion, the Committee **agreed** to acknowledge the Aberdeenshire Council submission to the Call for Views by the Scottish Parliament on Financing and Delivering a Net Zero Scotland which was submitted under delegated powers and following internal consultation.

8. LOCAL HEAT AND ENERGY EFFICIENCY STRATEGIES DRAFT ORDER CONSULTATION

There was circulated a report dated 5 February, 2022, by the Director of Environment and Infrastructure Services which detailed the Council's response to the Scottish Government on the Local Heat and Energy Efficiency Strategies (LHEES) Draft Order Consultation which placed a duty on local authorities to produce a LHEES and Delivery Plans by 31 December, 2023, and subsequently on a 5 yearly cycle. The consultation response from Aberdeenshire Council was to support this Order.

The report explained that the consultation was issued on 6 January, 2022, with a closing date of 2 February, 2022 and the Council was encouraged to submit a collective response. Officers also attended a workshop on the 27 January, 2022 to provide verbal feedback on the Order on behalf of the Council. The full consultation document and the response were included as appendices. As specified by the Scheme of Governance, due to the scheduled dates of Sustainability Committee meetings, the draft response was sent to the Chair, Vice Chair, and main opposition Spokesperson of the Committee for consultation and review prior to submission.

The Committee **agreed** to acknowledge the Aberdeenshire Council submission to Scottish Government on the Local Heat and Energy Efficiency Strategies Draft Order Consultation which was submitted under delegated powers, following consultation.

9. REGIONAL LAND USE PLANNING PARTNERSHIP – NORTH EAST REGION PILOT PROJECT

There was circulated a report dated 21 January, 2022, by the Director of Environment and Infrastructure Services on progress with the Regional Land Use Partnership Pilot, informing of the recent decision from Infrastructure Services Committee, and outlining next steps for the pilot.

The report explained that, since last reporting to Sustainability Committee on this matter in August 2021, engagement had been carried out with the North East Scotland Agricultural Advisory Group and its partners and most recently a report was presented to the meeting of the Infrastructure Services Committee on 20 January, 2022. The Infrastructure Services Committee report set out the proposed governance structure, and future expectations on how the pilot would work with identified established regional partnership groups in the North East Region.

The report highlighted that the programme of work for the pilot was set out in the Scottish Government Project Specification which had previously been shared with the Committee.

The Committee **agreed** to note recent progress on the pilot project.

10. CLOSING STATEMENT BY CHAIR

As this was the final meeting of the Sustainability Committee before the Local Government Election on 5 May, 2022, the Chair thanked the Vice-Chair, Members and Officers of the Committee for their contributions to the work of the Committee during the current Council term.

PROGRESS WITH OUTSTANDING ACTIONS FROM PREVIOUS MEETINGS OF THE SUSTAINABILITY COMMITTEE AS AT 15 JUNE 2022

	Item Title	Date of Meeting	Action Agreed	Responsible Service	Progress to Date
1.	Local Electricity Bill	19 05 21	The Committee agreed that Local Electricity Bill would be added to the Outstanding Actions list.	Environment & Infrastructure Services	<p>No action undertaken so far; item added to allow Sustainability Committee to take watching brief.</p> <p>The next stage for Local Electricity Bill, second reading, was scheduled to take place on 10 December 2021. It was then rescheduled for 25 February 2022 but now looks on the website like it was rescheduled again for 06 May 2022. There are no further publications or further detail to understand the outcomes of this second reading on the website at time of this publication.</p> <p>Link to the Bill - Local Electricity Bill - Parliamentary Bills - UK Parliament</p>
2.	Route Map to 2030.	25 08 21	The Committee agreed to instruct officers to arrange a workshop for Members on the methodology used within the toolkit.	Environment & Infrastructure Services	A workshop will be provided by officers after the summer recess – September 2022.

REPORT TO SUSTAINABILITY COMMITTEE – 15 JUNE 2022

ABERDEENSHIRE COUNCIL ROUTE MAP 2030 AND BEYOND

1 Executive Summary/Recommendations

1.1 This report contains the draft of Aberdeenshire Council's Route Map 2030 and Beyond which has been developed by consultants with the support of Aberdeenshire Council officers.

1.1.1 The project looked at what the requirements will be across the Council to reach its own 75% reduction in emissions by 2030 target and Net Zero by 2045. Carbon Dioxide Equivalent (CO₂e) emissions and financial estimates have been made for projects identified. A part of this work included the development of a toolkit which will identify a complete view of decarbonisation progress against planned CO₂e reduction. This includes a view of the Capital/Revenue impact and cost effectiveness (£/tCO₂e) of each reduction project so that the Council can analyse the impact on the overall budget and prioritise project selection.

1.2 The Committee is recommended to:

1.2.1 Consider and comment on the draft Route Map 2030 and Beyond (Appendix 1); and

1.2.2 Instruct the Director of Environment & Infrastructure to finalise the Route Map 2030 and Beyond in order for it to be presented to Full Council for approval.

2 Decision Making Route

2.1 Section 44 of Part 4 of the Climate Change (Scotland) Act 2009 places duties on public bodies relating to climate change which entered into force on 1 January 2011. These duties require that a public body must, in exercising its functions, act:

- in the way best calculated to contribute to delivery of the Act's emissions reduction targets;
- in the way best calculated to deliver Scotland's statutory climate change adaptation programme; and
- in a way that it considers most sustainable.

2.2 The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 sets national emissions reduction targets as:

- At least 75% lower than the baseline year by 2030;

- At least 90% lower than the baseline year by 2040; and
- Net Zero by 2045 ('Net Zero' refers to achieving an overall balance between emissions produced and emissions taken out of the atmosphere).

- 2.3 On 18 March 2020 Aberdeenshire Council ([item 9](#)), agreed a Climate Change Declaration committing to working towards a carbon free society by reducing its own emissions by 75% (2010/11 baseline) by 2030 and to work with others across the region to ensure that Aberdeenshire reaches Net Zero by 2045.
- 2.4 On 24 June 2021 Aberdeenshire Council ([item 10](#)), agreed a one-off allocation of £100,000 to support the next phase of developing the Carbon Budget setting process. The revised process has been to support the Council in developing a toolkit which has helped to cost out a Route Map to 2030. The next steps will be to fully integrate the Carbon Budget with the Council's financial budgets.
- 2.5 On 25 August 2021, the Sustainability Committee ([item 6](#)) agreed a project outline for the one-off allocation and consultants Arcadis began working on the Route Map 2030, Toolkit development (for estimating cost per tonne saved for all the significant measures through the creation of a Marginal Abatement Cost Curve - MACC), and Carbon Budget 2022-23 on 22 November 2021.
- 2.6 On 16 February 2022, the Sustainability Committee ([item 6](#)) was provided an update on the progress of the development of the Carbon Budget 2022/23, Route Map 2030, and Toolkit.
- 2.7 On 9 March 2022, Aberdeenshire Council ([item 7](#)) approved the Carbon Budget 2022 – 2023. At the same meeting, £500,000 was approved to support the further development of the Route Map through necessary feasibility work on a cross section of the Council's operational buildings. Some other opportunities for feasibility/technical studies are also being considered as outlined by the recommendations in section 2.2 of the Route Map 2030 and Beyond document (**Appendix 1**).

3 Discussion

- 3.1 On 29 October 2021 the Scottish Government, in partnership with Sustainable Scotland Network (SSN), published the [Public Sector Leadership on the Global Climate Emergency](#) guidance. The guidance is in part to support the Climate Change (Duties of Public Bodies: Reporting Requirements) (Scotland) Amendment Order 2020 which set out additional requirements for reporting periods commencing on or after 1 April 2021. Public bodies' annual Climate Change reports must now also include:
- where applicable, the body's target date for achieving zero direct emissions of greenhouse gases, or such other targets that demonstrate how the body is contributing to Scotland achieving its emissions reduction targets;

- where applicable, targets for reducing indirect emissions of greenhouse gases;
- how the body will align its spending plans and use of resources to contribute to reducing emissions and delivering its emissions reduction targets;
- how the body will publish, or otherwise make available, its progress to achieving its emissions reduction targets; and
- where applicable, what contribution the body has made to helping deliver Scotland's Climate Change Adaptation Programme (currently the 2019 - 2024 Programme)

3.2 This initial guidance is fairly high level and will be augmented with greater detail via case study examples of action already happening across the public sector. This work is currently still under development with Scottish Government and SSN.

3.3 Aberdeenshire Council is already very well placed to demonstrate most of the additional requirements. The development of the Route Map 2030 and Beyond has captured the gaps in the above reporting requirements ensuring that the Council will be complying fully with the Amendment Order.

3.4 The Route Map 2030 and Beyond can be found in **Appendix 1**. The report covers:

- Introduction to the Route Map 2030 and Beyond – key activities and targets driving the development of the Route Map;
- Recommendations – these have been grouped by process and organisation, technology, information, people and culture;
- Future Carbon Budgets – these have been designed utilising the toolkit which was also developed as part of this project. Actions within these future carbon budgets focus on the Council's operational buildings, fleet and LED streetlight programme as these are the largest emitters.

3.5 The 2 gaps requiring additional work ensuring that the Council will be complying fully with the Amendment Order are outlined within the recommendation section 2.2.2 of the Route Map 2030 and Beyond under recommended actions point 9:

- Residual emission action plan including an organisational carbon footprint scope and target review;
- Resilience/adaptation assessment.

3.6 There has been a great deal of stakeholder engagement across services to gather data for the project. Focus has very much been on the opportunities to

further reduce the Council's emissions from its operational buildings, fleet and street lighting as these areas are responsible for the largest portion. In addition, opportunities around reuse and recycling of resources, circular economy, road maintenance, business travel including in personal vehicles and flood lighting across our household recycling centres, sport areas and parks are also being considered.

4 Council Priorities, Implications and Risk

4.1 This report helps deliver all six of the Council's Strategic Priorities.

Pillar	Priority
Our People	<ul style="list-style-type: none"> • Education • Health & Wellbeing
Our Environment	<ul style="list-style-type: none"> • Infrastructure • Resilient Communities
Our Economy	<ul style="list-style-type: none"> • Economy & Enterprise • Estate Modernisation

4.2 The table below shows whether risks and implications apply if the recommendations are agreed.

Subject	Yes	No	N/A
Financial	X		
Staffing	X		
Equalities and Fairer Duty Scotland	IJA attached as Appendix 2		
Children and Young People's Rights and Wellbeing	IJA attached as Appendix 2		
Climate Change and Sustainability	IJA attached as Appendix 2		
Health and Wellbeing			X
Town Centre First			X

4.3 The financial implications in reaching carbon emission reduction targets are significant and will need to be addressed and identified for the organisation as a whole. This work will inform the Council's Medium -Term Financial Strategy and in doing so seeks to ensure that the programme of activities and projects represent best value in how the Council helps to deliver the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019. The target of 75% by 2030 is more challenging and will involve the need for considerable investment by both the Council, UK and Scottish Government and other stakeholders. The development of the toolkit has supported this requirement by identifying the need and amount of investment required.

4.3.1 Capital expenditure of implementing a reduction in Aberdeenshire Council's emissions has been estimated within Table 6 of the Route Map 2030 and Beyond. The estimates are broken down to the level of annual expenditure with an estimated total of £89,088,347 to reach a 75% reduction in emissions by 2030. These indicative costs focus on only operational buildings, fleet and streetlighting. It is estimated a further 10% of funding should be considered to

cover actions in other areas where we report emissions. The bulk of the investment (approximately 60%) is required within the next 3 years (2023/24 - 2025/26) in order for the 75% reduction in emissions to be realised by 2030. It is also important to note that the toolkit is still to be finalised and so this figure may still change. Further feasibility studies to be completed in 2022/23 will provide more detailed and robust whole life costings. In addition, there will always be some fluidity with these figures as costs behind assumptions change with current market climate.

4.3.2 The figures above do not include Revenue consequences of borrowing which will be around £4million for 40 years. They also do not include future Revenue savings being made by some of the interventions, for example energy efficiency projects. Some of the funding required will already be set out in the Capital Plan. For example, £5 million per annum from 2025/26-2030/31 has already been approved for fleet replacement. Therefore, the total of additional funding for the Council to meet its targets is still to be determined. Once this has been identified, changes to the Capital Plan would need to be agreed by the Capital Plan Group for affordability and would then need approval by Full Council. Some work is still required to complete this before the Route Map 2030 and Beyond is put before Full Council for approval.

4.3.3 In achieving the Council's targets we will also have to include a general evolution of staff roles to incorporate consideration of climate change as part of the day job. In the next 2 - 5 year period Services and Directorates will be supported through augmenting the corporate lead team on Climate Change as well as putting in place project specific leads. The options for funding this approach will be developed further in discussion with Finance and Service leads. This is likely to be a combination of sourcing external funding, building into the Capital Programmes of work, gaining support as part of collaborations and putting in place secondment opportunities.

4.4 An Integrated Impact Assessment (IIA) has been carried out as part of the development of the proposals set out above. It is included as **Appendix 2** and there is a positive impact as follows:

- The Route Map 2030 and Beyond identifies many projects which will support a reduction in the Council's own emissions and therefore its contribution to regional emissions, demonstrating a positive impact towards supporting action on climate change mitigation and adaptation.
- Reducing emissions from actions within the Council will support a cleaner, safer environment for children, young people, staff and residents of Aberdeenshire as well as provide exciting opportunities for development and learning.

4.5 The following Risks have been identified as relevant to this matter on a Corporate Level, however it is acknowledged that working towards a 75% reduction in Council owned emissions has the potential to impact upon any number of areas across the Council risk portfolio.

- Risk ID ACORP010 as it relates to environmental challenges and Risk ID ACORP006 as it relates to reputation management within the [Corporate Risk Register](#)).

4.6 The following Risks have been identified as relevant to this matter on a Strategic Level:

- Risk ID ISSR004 as it relates to Climate Change in the ([Directorate Risk Registers](#))

5 Scheme of Governance

- 5.1 The Head of Finance and Monitoring Officer within Business Services have been consulted in the preparation of this report and their comments are incorporated within the report. They are satisfied that the report complies with the [Scheme of Governance](#) and relevant legislation.
- 5.2 The Committee is able to consider and take a decision on this item in terms of Section R paragraph 1.1 (a) of the List of Committee Powers in Part 2A of the Scheme of Governance as it relates to monitoring the Council's work in respect of sustainable development and climate change.

Alan Wood
Director of Environment and Infrastructure Services

Report prepared by Claudia Cowie Team Leader Sustainability and Climate Change
Date: 6 June 2022

List of Appendices:

Appendix 1 - Aberdeenshire Council Route Map 2030 and Beyond
Appendix 2 – Integrated Impact Assessment



From mountain to sea

Route Map 2030 and Beyond (DRAFT)

Aberdeenshire Council

June 2022



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1 Introduction to the Route Map

Aberdeenshire Council is responsible for providing a wide range of services to the population of Aberdeenshire (circa 243,000). The Council is currently made up of 70 elected Councillors representing 19 multi-member electoral wards with a number of Councillors in each.

Aberdeenshire Council currently employs around 13,500 workers and is responsible for an annual revenue budget of around £661 million.

On 18 March 2020 Aberdeenshire Council agreed a Climate Change Declaration, committing to working towards a carbon free society by reducing its own emissions by 75% (2010/11 baseline) by 2030 and to work with others across the region to ensure that Aberdeenshire reaches Net Zero by 2045.

Aberdeenshire Council's first Carbon Budget was set on 9 February 2017. Each year the process has been developed further and it has also become more embedded within services.

However, the Carbon Budget has never been fully integrated into the financial budgets and the Route Map aims to position the key actions and financial impact of reaching a 75% reduction in emissions by 2030.

This Route Map 2030 and beyond document describes

- Aberdeenshire's Route Map to 2030 and Beyond, summarising the key activities and milestones to deliver the vision
- The future Carbon Budgets

2 Route Map to 2030 and Beyond

2.1 Introduction

Scotland has set in law ambitious targets to reach net-zero emissions by 2045 (Scottish Government, 2019) with interim targets of 90% reduction by 2040 and 75% reduction by 2030. Aberdeenshire Council has aligned with these targets.

As set out in the Public Sector Leadership on the Global Climate Emergency Guidance:

"Climate change is a responsibility for all organisations, and action on it is a core deliverable of all public bodies. There must be clear accountability across senior leadership in the organisations for climate action. Climate change should be embedded using good governance principles".

Communication of the direction of change and key milestones through this Route Map 2030 and beyond is to provide opportunities for joining up national and local priorities.

The content is built up from an amalgamation of key activities and targets from the following sources

- **Scottish Government national guidance** – refer to Appendix A for a detailed overview of the key policies;
- **Climate Ready Aberdeenshire-** Aberdeenshire’s climate change adaptation and mitigation regional strategy development;
- **Aberdeenshire Council Climate Change Declaration** - the move to a more sustainable and low carbon future; and
- **Route Map 2030 Transformation Map** – summarising key activities to transform the authority and build the capability and capacity to meet a 75% reduction in its own emissions by the end of the decade.

As part of the Route Map development, a detailed analysis was conducted of current Council challenges around climate action, followed by an assessment of the root causes and recommended solutions of these issues.

This insight fed into a risk assessment to Route Map 2030 implementation aimed at considering the key risks to delivering on the 2030 and 2045 milestones. All risks were categorised Very High, High, Medium and Low to support prioritisation of the mitigation measures. The Transformation Map presents the proposed actions to mitigate these risks in different colours as indicated in the legend of Figure 1.

2.2 Recommendations

Recommended actions have been grouped for implementing the Route Map as follows:

- **Process & Organisation**
 - **Technology**
 - **Information**
 - **People and Culture**
-

2.2.1 Process & Organisation

	Recommended actions	Key Stakeholders
1	Set up a central steering group: Take ownership of and monitor progress of delivery of the projects and Route Map 2030. Identification and recommend measures to manage resistance to change.	Senior representatives from all Directorates
2	Define clear roles & responsibilities: Define accountabilities, roles, responsibilities across the Authority for delivering the Route Map 2030. This should be followed by delivering an internal capability and capacity gap analysis against this for all services and recommend actions to address the gaps and resource challenges.	Environment & Sustainability working closely with HR and Legal
3	Supply Chain Capacity and Capability Gap Analysis: Confirm the ability for current and local suppliers to deliver the future type and volume of hard interventions and services. This includes procurement strategy review, frameworks and existing (long term and FM) contract gap analysis.	Procurement
4	Set targets for reducing Direct and Indirect emissions: Requirement as set out in the Climate Change (Duties of Public Bodies: Reporting Requirements) (Scotland) Amendment Order 2020 for reporting periods commencing on or after 1 April 2021. These will need to be identified and then different targets set for different sources.	Environment and Sustainability working closely with other services e.g. Housing, Commercial & Procurement

2.2.2 Technology

	Recommended actions	Key Stakeholders
5	Delivery of the Feasibility studies at operational buildings, to support definition of the 2023/24 Carbon Budget by January 2023, which includes: <ul style="list-style-type: none"> • Pilot study design and feasibility study specification • Heat pump study specification (both ground and air source) 	Property and Facilities Management

	<ul style="list-style-type: none"> • Procure contractors to deliver both surveys as well as the hard interventions to the estate • Oversee delivery of the surveys and quality assurance • Assessing the potential for further renewables programme • Assess data and design interventions • Develop the Whole Life Cost and Business Case regarding the financial implications of the interventions • Identify the synergies with concurrent activity including the Non Domestic Energy Efficiency Fund • Identify roofs on buildings that are suitable for the installation of PV and the enabling works required to allow PV to be installed • Finalise 2023/24 Carbon Budget <p>This should include the following elements:</p> <ul style="list-style-type: none"> • Design heat pump pilot studies and develop specification for the survey; and • Update current fuel/technology choice strategy. 	
	Delivery of supporting technical studies including	
6	<ul style="list-style-type: none"> • EV/H2 Fleet Assessment 	Roads and Infrastructure
7	<ul style="list-style-type: none"> • Develop Hydrogen Strategy 	Environment and Infrastructure/Business Services
8	<ul style="list-style-type: none"> • Electrification Risk/Resilience Study • Embed zero carbon standard for both new build and retrofit initiatives 	Property and Facilities Management
9	<ul style="list-style-type: none"> • Residual Emission Action Plan including an organisational carbon footprint scope and target review • Resilience/Adaptation Assessment • Develop Local Heat and Energy Efficiency Strategy (LHEES) • Develop Re-use Business Case 	Environment & Sustainability

2.2.3 Information

	Recommended actions	Key stakeholders
10	Central assurance and reporting: Design and implement a central reporting function, possibly incorporated in the current carbon budget tool. All services should centrally store progress data to track if projects are on track, delivered on or under budget and risks to successful delivery can be identified on time to be mitigated. A dashboard function can present near real-time data to management to support KPI reporting and data led decision-making.	Environment & Sustainability

2.2.4 People and Culture

	Recommended actions	Key stakeholders
11	Communications to support and implement the change and generate buy-in of the people and Directorates at all levels: Design and management of the communications and map the impact on the people and what it means for them.	Environment & Sustainability, supported by senior representatives from all Directorates

Figure 1: Aberdeenshire Transformation Map – Recommendations to set up the organisation and people for successful delivery of the Route Map

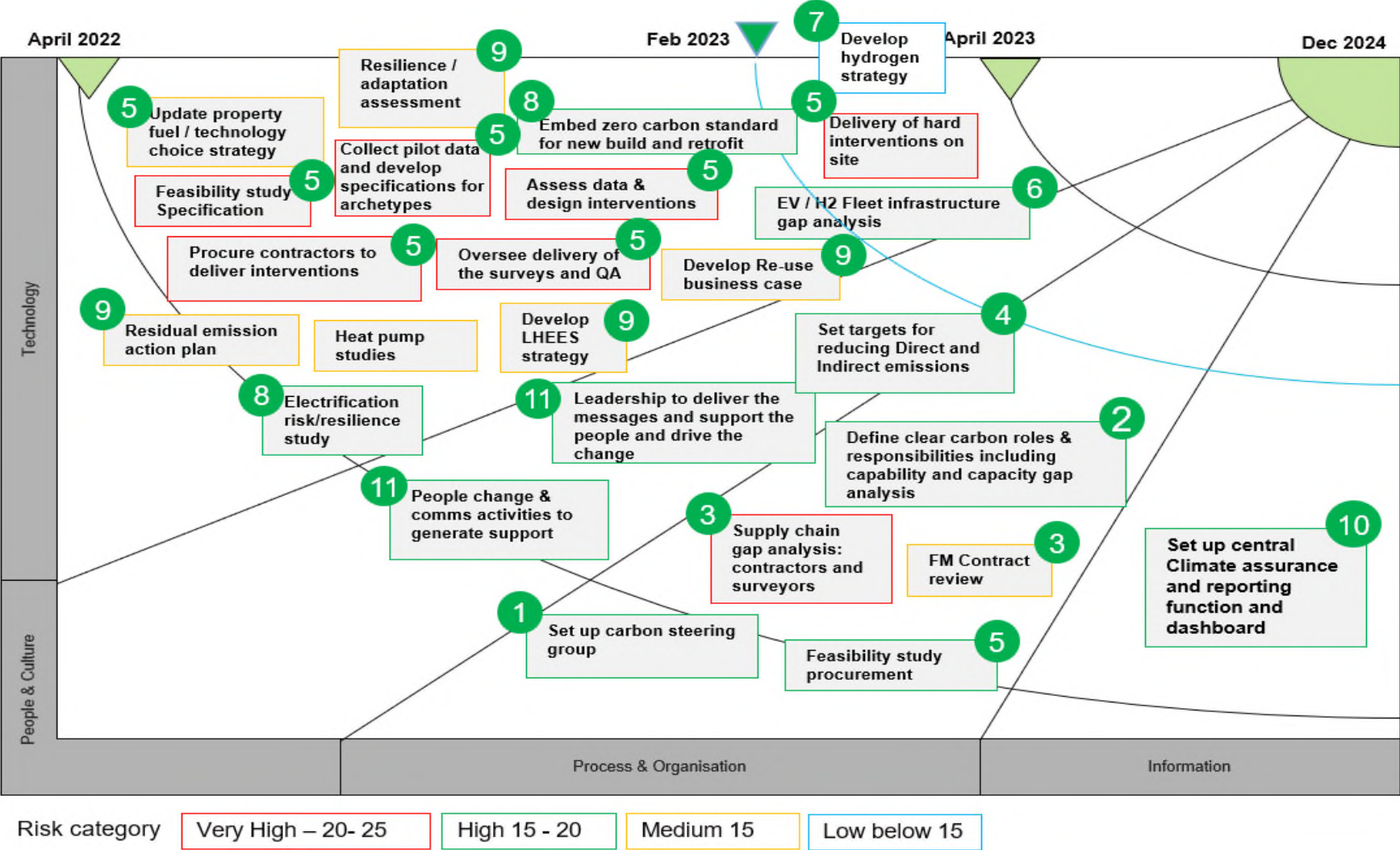
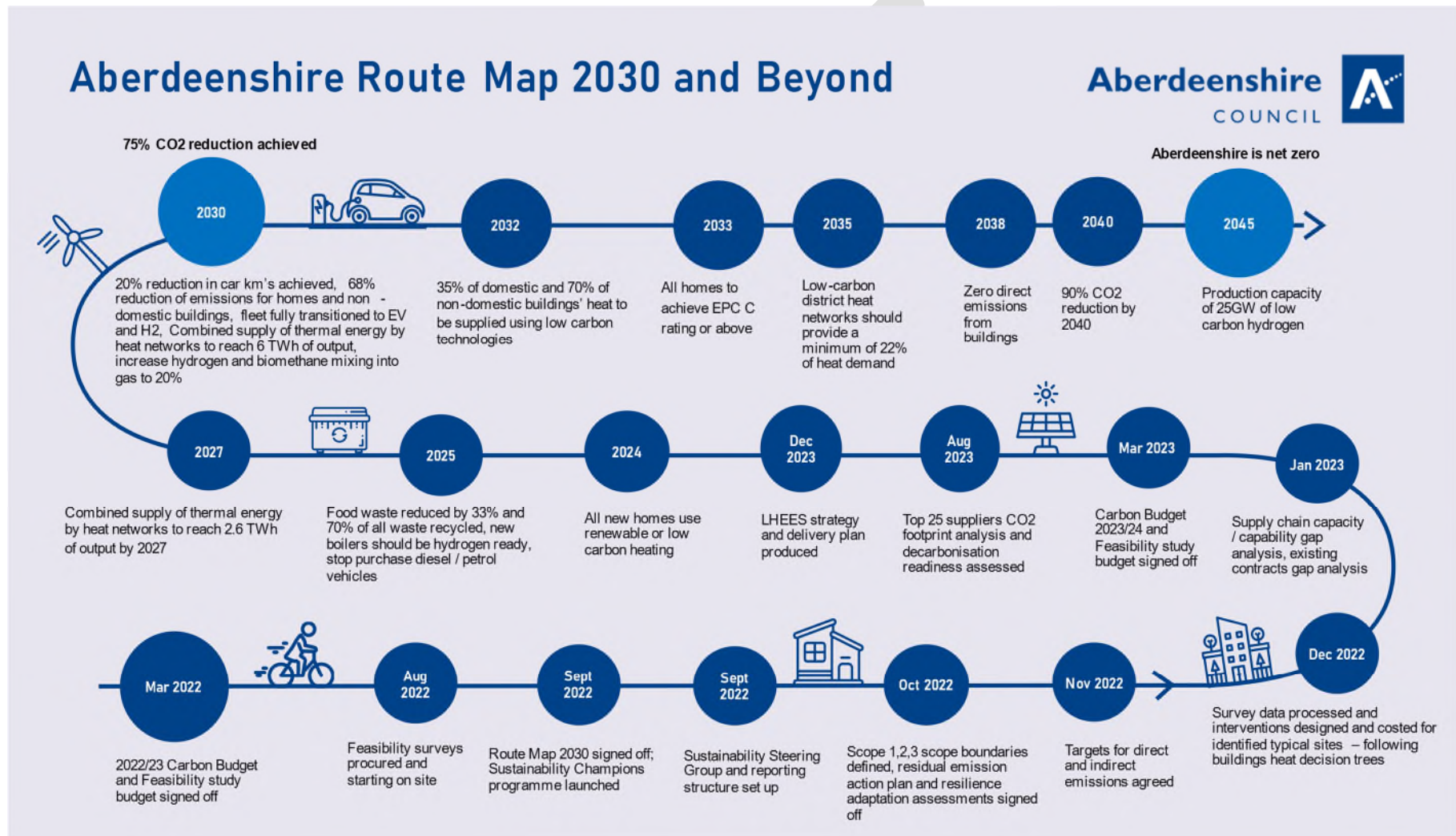


Figure 2: Aberdeenshire Route Map 2030 and Beyond



3 Future Carbon Budgets

3.1 Introduction

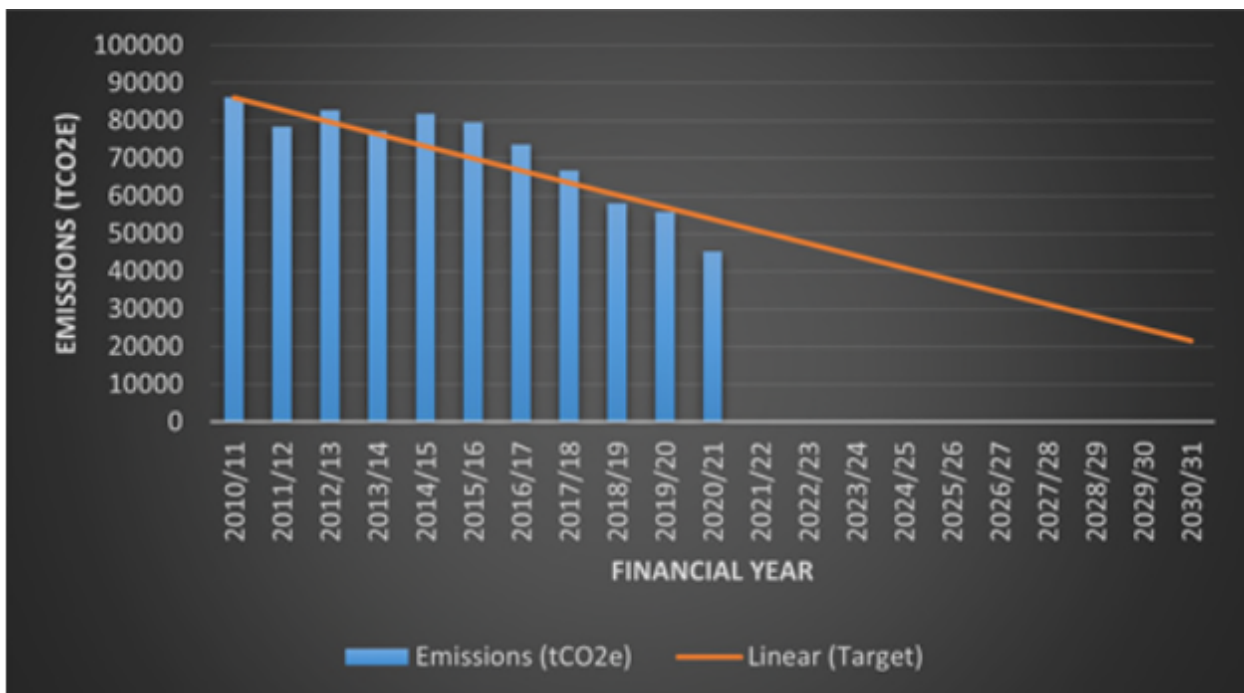
The formal adoption of the Carbon Budget process in 2017 marked one of the most significant shifts and since then there has been reasonable progress. As an organisation, Aberdeenshire Council have taken positive steps such as the establishment of the Carbon Budget process, establishing the Sustainability Committee as a full Committee in 2017 and development of this Route Map and a Carbon Budget Toolkit to support teams to build up their respective future Carbon Budgets.

The annual Carbon Budget figure is set each year to keep the Council on track for its commitment to reduce emissions by 75% by 2030 and be Net Zero by 2045 using 2010/11 as a baseline year. Management of the necessary annual reduction in emissions is the responsibility of the Senior Leadership Team with support from key services and the Sustainability and Climate Change Team.

The Carbon Budget is set in February/March each year at the same time as the Council's Revenue and Capital budgets and is monitored throughout the year by the Sustainability Committee and other relevant Policy Committees.

The table and visuals below (figures 3 and 4) demonstrate the level of direct influence of respective Directorates to support the delivery of the decarbonisation target of 21,539 tonnes Carbon Dioxide Equivalent (tCO₂e) to meet the 75% reduction target by 2030/31.

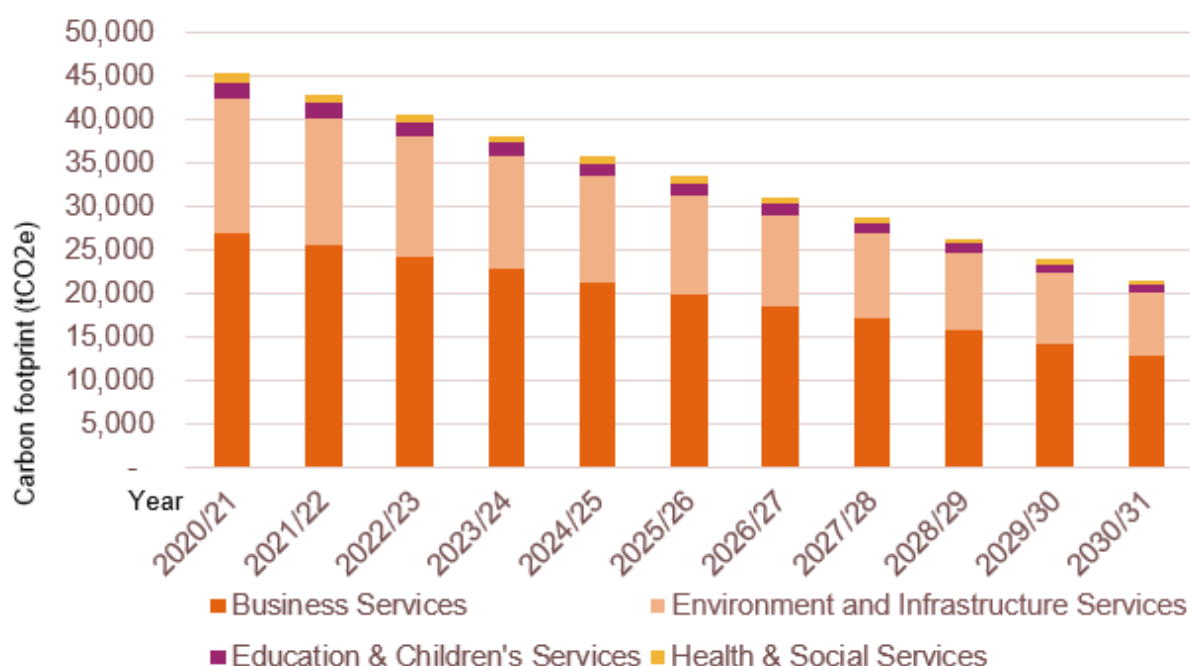
Figure 3 Aberdeenshire Council 2030/31 Target Trajectory Graph



The Directorates are provided with annual CO₂e reduction targets to support the identification and cost interventions needed to decarbonise their services to form the Authority’s Carbon Budget. These targets are presented by the new Carbon Budget tool and take into consideration and are reduced by the appropriate estimate of grid decarbonisation (tCO₂e) in that year.

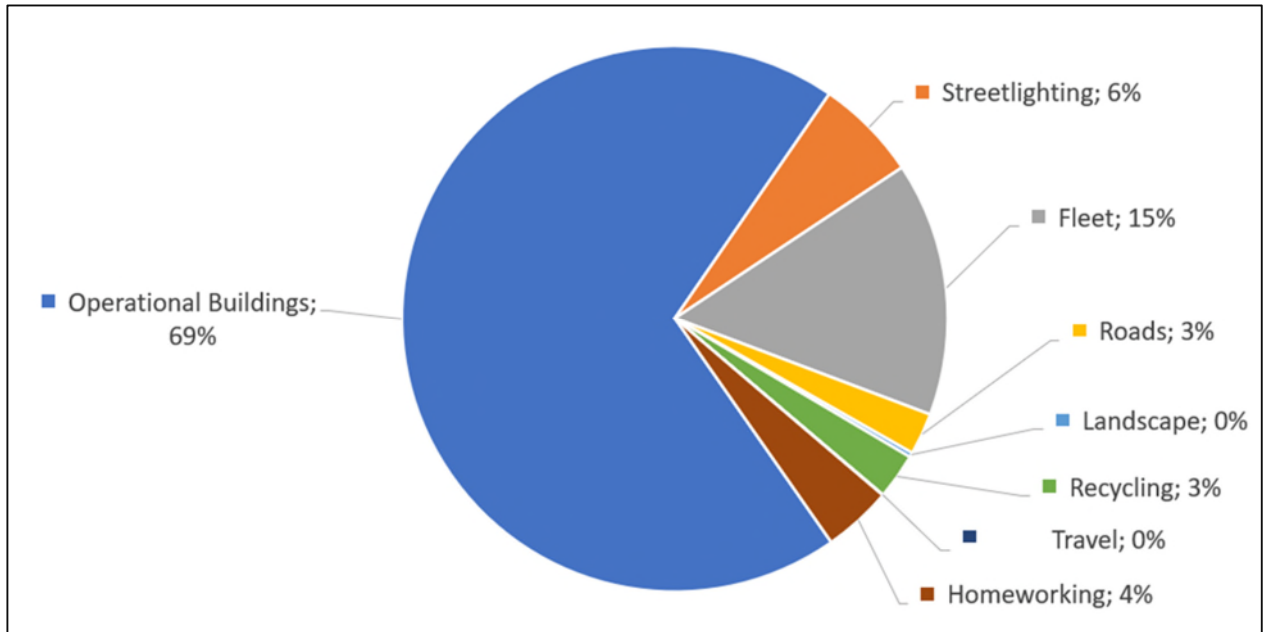
The direct level of influence the respective Directorates must support to deliver on the Council’s decarbonisation targets in 2030 and beyond differs as presented by the visual. Appropriate budgets, resources and support from key services are key to support them to plan, design, procure and deliver the hard interventions on the ground working closely with the user community. The emissions data below (figure 4) was sourced from the 2015/16 Aether report.

Figure 4: Annual Proportion of tCO₂e contribution by Directorate



In 2020-21 the Council’s footprint was 45,282 tCO₂e which was split up as per the visual overleaf (figure 5). Operational buildings, street lighting and fleet represent 90% of the Authority’s carbon footprint as presented by figure 5. This clearly demonstrates the key for the Property Management team who influence over 65% of the total footprint. Part of this is making sure that the user communities are clear and are taking the necessary steps to change how stakeholders use and operate the buildings to minimise energy and contribute to reduce the carbon footprint. The new Carbon Budget toolkit was used to calculate the indicative future Carbon Budget required for each of these key teams to deliver on the vision as presented below.

Figure 5: Proportion of tCO2e contribution by Service



3.2 Operational Non Domestic Buildings

We have provided below a future Carbon Budget for Property & Facilities Management (Table 1) to implement retrofit interventions to Council owned non domestic buildings with a view to improve efficiency and deliver the targeted of 75% carbon reduction.

The proposed retrofit work includes a balanced set of measures to save energy, decarbonise heat and generate and store energy with a view to reduce to net or near net zero emissions.

The future budget is generated using the new carbon toolkit. The numbers in table 1 are based on an example programme of interventions on a range of typical sites in line with the heat decarbonisation decision tree in figure 6 below. It should be noted that the actual approach to selection and delivery of interventions will probably be different which will impact the indicative numbers presented. However, it is unlikely that the current front loading of the programme in the first three years can be avoided.

Figure 6: Property Service heat decarbonisation decision tree to implement decarbonisation interventions

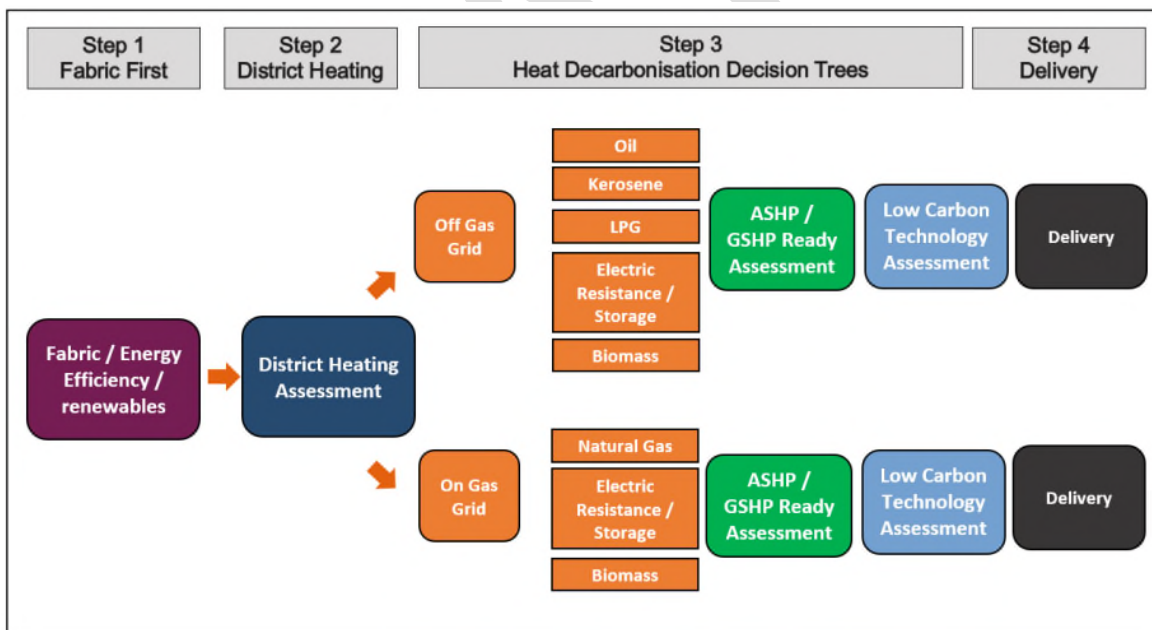


Table 1: Property annual targets (tCO2e) and related capital expenditure (£)

Year	Reduction target (tCO2e)	Capital Expenditure (£)
2023/24	9,349.43	£12,647,543
2024/25	5,252.55	£20,469,455
2025/26	2,595.87	£9,369,369
2026/27	100.06	£554,344
2027/28	456.33	£3,026,648
2028/29	26.60	£791,596
2029/30	35.71	£935,038
Total	17,816.53	47,103,863

We have included an extract of the Route Map 2030 Marginal Abatement Cost Curve (MACC) for the Property Management team (figure 7).

This figure presents the cost of proposed emission reductions in £/tCO2e on the y-axis, alongside emission reduction potential in tCO2e per annum on the horizontal x-axis. In this context, ‘abatement’ means ‘reducing’.

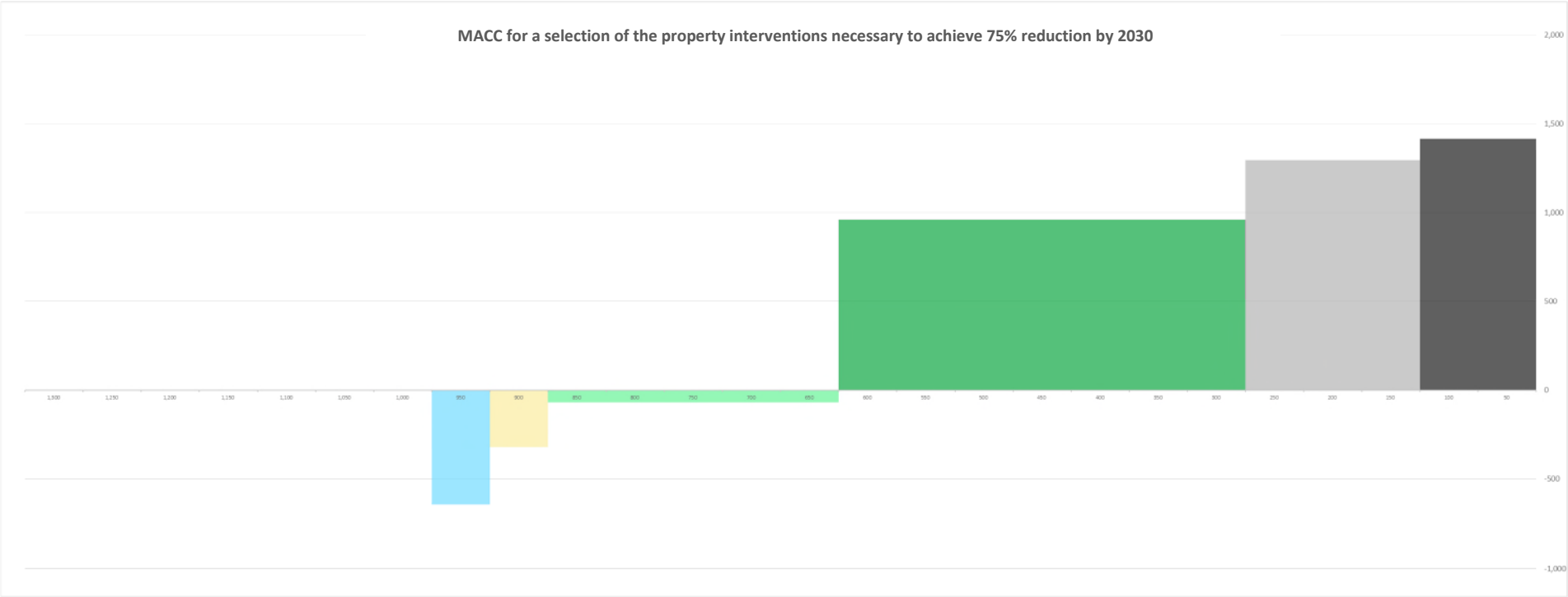
For the benefit of this report, we included a small sample of the proposed retrofit interventions to the buildings required to reach the 2030/31 targets. A full and interactive version is available in the Carbon Budget Toolkit to support the Council’s teams in identifying interventions with the highest savings to build an annual programme and future Carbon Budgets.

The MACC visual supports teams to compare financial costs and/or cost reductions as a result of a vast range of possible retrofit interventions to existing public sector buildings which are presented as coloured vertical columns.

This visual presents the cost and carbon impact of these retrofit measures for a wide range of typical Aberdeenshire sites including primary schools, academies, leisure centres, care homes, depots, and offices. The estimated costs and impact of the interventions in the Carbon Budget Tool are calculated by the new Council's Carbon Budget Toolkit using a large set of benchmark data of similar buildings throughout the UK.

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Figure 7: Extract from Property’s 2030 Route Map Marginal Abatement Cost Curve (MACC)



Green Example Primary School Air Source Heat Pump (realising 600 tCO2e reduction at a cost of 961 £/tCO2e)

Black Example Primary School Double Glazing (realising 100 tCO2e reduction at a cost of 1416 £/tCO2e)

Grey Example Academy LED replacement programme (realising 200 tCO2e reduction at a cost of 1295 £/tCO2e)

Light Blue Example Swimming Pool LED replacement programme (realising 950 tCO2e reduction at a saving of 643 £/tCO2e)

Yellow Example Swimming Pool LED replacement programme (realising 900 tCO2e reduction at a saving of 320 £/tCO2e)

Light Green Example Swimming Pool Double Glazing (realising 850 tCO2e reduction at a saving 70 £/tCO2e)

3.3 Fleet

This paragraph presents the costs of decarbonisation of Aberdeenshire Council's commercial fleet. The data excludes the cost of installation of necessary charging and refuelling infrastructure. Due to the limited availability of hydrogen fuel cell vehicles, this analysis focusses on the transition into a fleet of electric vehicles. It would still be our strategic intent to adopt hydrogen alongside EV in the period to 2030.

Current analysis demonstrates that the maximum fleet decarbonisation from the current carbon footprint of 6536 CO₂e is approximately 55%. This is based on current Government's 'Environmental reporting guidelines' which state electric vehicles available in today's market cannot yet be considered net zero due to the electricity supplied to the grid not being carbon neutral.

Table 2 and table 3 have been presented below for fleet replacement up to 2030/31 (target year for 75% reduction and focus for this Route Map report) and the second table presents the cost for full electrification of the commercial fleet. It is anticipated that the fleet's footprint by 2030/31 will have reduced by an estimated 45% and from 2032/31 by an estimated 55% respectively from the current carbon footprint.

Due to given constraints in the vehicle market, the Council is over the next 2 years replacing like-for-like (diesel with diesel vehicles) and will continue decarbonisation of its fleet from 2025/26.

The tables below present the impact of electrification of the fleet as

- Anticipated carbon footprint of the commercial fleet in tCO₂e
- Estimated increase of the cost of ownership of the fleet

The planned transformation is based on the currently planned programme of vehicle replacements year by year as presented in Cenex report 'Zero Emission Fleet and Infrastructure Review' which was issued to Aberdeenshire Council in October 2021.

Table 22: Planned fleet electrification trajectory and carbon reduction (tCO2e) versus additional cost of ownership (£) per annum to 2030/31

Year	Planned reduction - realised by fleet electrification (tCO2e)	Increased cost of ownership as a result (£)
2025/26	523	1,455,692
2026/27	839	3,882,912
2027/28	447	5,459,129
2028/29	203	6,081,665
2029/30	380	7,402,341
2030/31	509	8,413,674
Total	2,091	£32,695,412

Table 33: Full fleet electrification trajectory and carbon reduction (tCO2e) versus additional cost of ownership (£) per annum

Year	Planned reduction - realised by fleet electrification (tCO2e)	Increased cost of ownership as a result (£)
2025/26	523	1,455,692
2026/27	839	3,882,912
2027/28	447	5,459,129
2028/29	203	6,081,665
2029/30	380	7,402,341
2030/31	509	8,413,674
2031/32	365	9,222,870
2032/33	263	9,794,830
Total	3529	£51,713,112

3.4 Street Lighting

The programme of streetlight replacements to date has successfully exceeded annual decarbonisation targets year-on-year. The cost and decarbonisation impact of the planned remaining interventions next year are presented below (table 4).

Table 44: Street lighting annual targets (tCO₂e) and related capital expenditure (£)

Year	Reduction Target (tCO ₂ e)	Planned reduction - realised by the interventions (tCO ₂ e)	Capital Expenditure (£)
2023/24	141	322	£500,000

3.5 Aberdeenshire future indicative carbon budget

To meet the target of 75% decarbonisation against the baseline of a footprint of 86,155 tCO₂e in 2010/11, Aberdeenshire Council requires to decarbonise to 21,539 tCO₂e by 2030/31 (table 5).

Table 55: Aberdeenshire carbon baseline and targets (tCO₂e) to achieve 75% reduction

Year	Annual emissions (tCO ₂ e)	Annual reductions (tCO ₂ e)
• 2010/11	• 86,155	• 3,231 (linear)
• 2020/21	• 45,281	• 2,374 (based on 2021 footprint)
• 2030/31	• 21,539	

Property, Street lighting and Fleet account for over 90% over the current footprint. On that basis, we have calculated Aberdeenshire’s indicative future Carbon Budget as the sum of the Capital expenditure of these 3 Services to deliver a 75% carbon reduction plus an additional 10% to account for projects by other teams including Waste, Roads and Infrastructure, Landscaping, Business Travel and Homeworking (table 6).

The cumulative Carbon Budget investment required by Property, Street lighting and Fleet to deliver the target is £80,989,406. We have allowed an estimated 10% or £8,098,940 (or £1,012,367 per annum) to design, procure and deliver projects of other services. However, it should be highlighted that this is an estimation of cost based on current thinking, the further studies will provide more detailed and robust whole life costings.

A total Carbon Budget investment of around £89,088,347 to deliver on Aberdeenshire’s vision and meet Scottish Government national targets set for 2030/31.

It is important to highlight that this expenditure is front loaded to reach the 2030/31 reduction target with approximately 60% of the interventions delivered within the first three years.

Table 66: Aberdeenshire indicative future carbon budget required to deliver 75% by 2030/31*

Year	Total Capital Expenditure (£)	Property	Fleet	Street lighting	Other Services (10% contribution)
2023/24	£14,159,911	£12,647,543		£500,000	£1,012,367.58
2024/25	£21,481,823	£20,469,455			£1,012,367.58
2025/26	£11,837,429	£9,369,369	1,455,692		£1,012,367.58
2026/27	£5,449,624	£554,344	3,882,912		£1,012,367.58
2027/28	£9,498,145	£3,026,648	5,459,129		£1,012,367.58
2028/29	£7,885,629	£791,596	6,081,665		£1,012,367.58
2029/30	£9,349,747	£935,038	7,402,341		£1,012,367.58
2030/31	£9,426,042		8,413,674		£1,012,367.58
Total	£89,088,347	£47,793,993	£32,695,413	£500,000	£8,098,940

**Please note that currently all text and cost data in this Route Map 2030 report and benchmark data in the Carbon Budget is going through a final review - which may lead to further updates.*

Appendix A - Summary of key targets outlined by policy

Table 77: Summary of key targets outlined by policy

Topic	Target	Implementation Date	Legislation, policy or guidance (plus reference)
Legislation			
Key Targets	Scottish target to reach Net Zero by 2045.	<ul style="list-style-type: none"> 75% reduction by 2030 90% reduction by 2040 Net zero by 2045 	Climate Change (Scotland) Act 2009 - <i>The 2050 and interim targets</i> Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 (asp 15) ,
	Consult in 2022 on a series of phased targets and new funding to support all publicly owned buildings meeting net zero heating requirements.	<ul style="list-style-type: none"> By 2038 	Heat Networks Delivery Plan - Page 23 Heat Buildings Strategy Page 74
	20% reduction in car kms driven. Phasing out of all petrol and diesel cars from public sector fleets - removing need for new petrol or diesel light commercial vehicles by 2025, and to phase out need for all new petrol and diesel vehicles in Scotland's public sector fleet by 2030.	<ul style="list-style-type: none"> 2025 2030 	National Transport Strategy (NTS2) Delivery Plan: Page 19
	The Scottish Government is committed to all buildings achieving net zero emissions by 2045.	<ul style="list-style-type: none"> 2045 	Net Zero Public Sector Buildings Standard – page 2 Scottish Futures Trust Net Zero Public Sector Buildings Standard

<p>Food waste reduced by 33% from the 2013 baseline by 2025.</p> <p>70% of all waste recycled by 2025.</p> <p>Landfilling of biodegradable municipal waste has ended by 2025.</p> <p>Reduce use of energy, water, and natural resources in support of circular economy principles and zero waste.</p>	<ul style="list-style-type: none"> • 2025 	<p>Climate Change Plan 2018 – 2032 Securing a Green Recovery on a Path to Net Zero- Page 159</p> <p>Aberdeenshire Climate Change Policy</p> <p>Aberdeenshire Council Resources and Circular Economy Commitment</p>
<p>All new homes shall use renewable or low carbon heating</p> <ul style="list-style-type: none"> - it is imperative that new homes consented from 2024 use zero direct emissions heating and cooling, + feature high levels of fabric energy efficiency to reduce overall heat demand. 	<ul style="list-style-type: none"> • From 2024 	<p>New Build Zero Emissions from Heat Standard – page 2</p>
<p>35% of domestic and 70% of non-domestic buildings' heat to be supplied using low carbon technologies.</p>	<ul style="list-style-type: none"> • 2032 	<p>Climate Change Plan 2018–2032 page 19</p>

Policy and Guidance

<p>Energy Efficiency</p>	<p>All homes to achieve equivalent to EPC C by 2033, where technically and legally feasible and cost-effective.</p>	<ul style="list-style-type: none"> • 2033 	<p>Scottish Government Energy efficiency policy – page 1</p> <p>Energy Efficiency Standard for Social Housing (EESHS2)</p>
	<p>68% reduction of emissions for homes and non-domestic buildings.</p>	<ul style="list-style-type: none"> • 2030 	<p>Protecting Scotland's Future: The Government's Programme for Scotland 2019-2020</p>

All rented non-domestic buildings will be EPC Band B.

District Heating

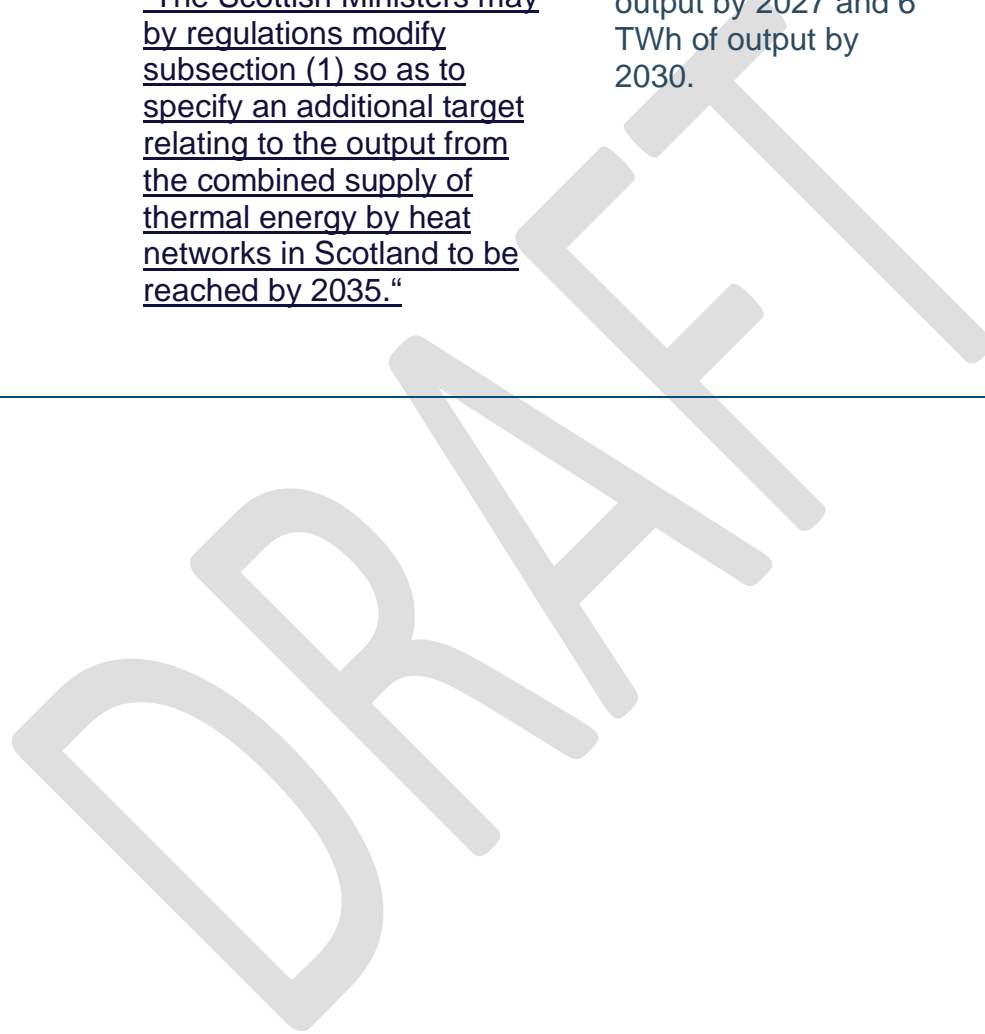
Low-carbon district heat networks should provide a significant share of public and commercial heat demand.

“The Scottish Ministers may by regulations modify subsection (1) so as to specify an additional target relating to the output from the combined supply of thermal energy by heat networks in Scotland to be reached by 2035.”

- 22% by 2035
- 42% by 2050
- Combined supply of thermal energy by heat networks to reach 2.6 TWh of output by 2027 and 6 TWh of output by 2030.

The Heat Networks (Scotland) Bill 2021

Heat Networks Strategy [page 25](#)



Technology	Target	Key Date	Legislation, policy or guidance
Heat pumps	The zero-emissions heat transition will involve changing the type of heating used in homes and non-domestic buildings, moving from high emissions heating systems, reliant on fossil fuels, to low and zero emissions systems such as heat pumps, heat networks and potentially hydrogen.	<ul style="list-style-type: none"> 2 million homes and 100,000 non-domestic buildings by 2045 	Climate Change Plan 2018–2032 page 92
Hydrogen	Boilers should be hydrogen ready.	<ul style="list-style-type: none"> 2025 	Climate Change Plan 2018–2032 page 219
	Increase hydrogen mixing into the gas system to be at least 20% green gas Production capacity of 5GW of low carbon hydrogen 100% hydrogen to become available	<ul style="list-style-type: none"> 2030 	Climate Change Plan 2018–2032 page 146 Heat Buildings Strategy page 57
	Production capacity of 25GW of low carbon hydrogen.	<ul style="list-style-type: none"> 2045 	Hydrogen Policy Statement – page 7
Bioenergy Review Scottish Heat and buildings strategy	Increase of biomethane injection into the gas system to be at least 20% green gas.	<ul style="list-style-type: none"> 2030 	Heat Buildings Strategy page 17
	Combined supply of thermal energy by heat networks to reach 2.6 TWh of output by 2027 and 6 TWh of output by 2030 - 3% and 8% respectively of current heat demand.	<ul style="list-style-type: none"> 2030 	Heat Networks Strategy page 25

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Aberdeenshire Council

Integrated Impact Assessment

Aberdeenshire Council Route Map 2030 and Beyond

Assessment ID	IIA-000686
Lead Author	Claudia Cowie
Additional Authors	Joel Evans
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Approved By	Ewan Wallace
Approved On	Tuesday May 31, 2022
Publication Date	Tuesday May 31, 2022

1. Overview

This document has been generated from information entered into the Integrated Impact Assessment system.

This report contains the draft of Aberdeenshire Council's Route Map 2030 and Beyond which has been developed by consultants with the support of Aberdeenshire Council officers. The project looked at what the requirement will be across the Council to reach its own 75% reduction in emissions by 2030 target and Net Zero by 2045. Carbon Dioxide Equivalent (CO₂e) emissions and financial estimates have been made for projects identified. A part of this work included the development of a toolkit to identify a complete view of decarbonisation progress against planned CO₂e reduction. This includes a view of the capital/revenue impact and cost effectiveness (£/tCO₂e) of each reduction project so that the Council can analyse the impact on the overall budget and prioritise project selection.

During screening 7 of 10 questions indicated that detailed assessments were required, the screening questions and their answers are listed in the next section. This led to 3 out of 5 detailed impact assessments being completed. The assessments required are:

- Childrens' Rights and Wellbeing
- Equalities and Fairer Scotland Duty
- Sustainability and Climate Change

In total there are 30 positive impacts as part of this activity. There are 0 negative impacts, all impacts have been mitigated.

A detailed action plan with 0 points has been provided.

This assessment has been approved by ewan.wallace@aberdeenshire.gov.uk.

The remainder of this document sets out the details of all completed impact assessments.

2. Screening

Could your activity / proposal / policy cause an impact in one (or more) of the identified town centres?	No
Would this activity / proposal / policy have consequences for the health and wellbeing of the population in the affected communities?	No
Does the activity / proposal / policy have the potential to affect greenhouse gas emissions (CO2e) in the Council or community and / or the procurement, use or disposal of physical resources?	Yes
Does the activity / proposal / policy have the potential to affect the resilience to extreme weather events and/or a changing climate of Aberdeenshire Council or community?	Yes
Does the activity / proposal / policy have the potential to affect the environment, wildlife or biodiversity?	Yes
Does the activity / proposal / policy have an impact on people and / or groups with protected characteristics?	Yes
Is this activity / proposal / policy of strategic importance for the council?	Yes
Does this activity / proposal / policy reduce inequality of outcome?	No
Does this activity / proposal / policy have an impact on children / young people's rights?	Yes
Does this activity / proposal / policy have an impact on children / young people's wellbeing?	Yes

3. Impact Assessments

Children's Rights and Wellbeing	No Negative Impacts Identified
Climate Change and Sustainability	No Negative Impacts Identified
Equalities and Fairer Scotland Duty	No Negative Impacts Identified
Health Inequalities	Not Required
Town Centre's First	Not Required

4. Childrens' Rights and Wellbeing Impact Assessment

4.1. Wellbeing Indicators

Indicator	Positive	Neutral	Negative	Unknown
Safe		Yes		
Healthy		Yes		
Achieving	Yes			
Nurtured		Yes		
Active		Yes		
Respected	Yes			
Responsible	Yes			
Included	Yes			

4.2. Rights Indicators

UNCRC Indicators upheld by this activity / proposal / policy	Article 3 - Best interests of the child
--------------------------------------------------------------	-----------------------------------------

4.3. Positive Impacts

Impact Area	Impact
Achieving	Pupils within schools which are signed up to one of the initiatives in this years Carbon Budget called Energy Sparks will become knowledgeable in energy saving opportunities and be able to share these at home and in the wider community. Pupils will learn new skills and can have an opportunity to lead on different energy saving initiatives as well as work collaboratively across the school and with other schools on the programme. They can feel empowered to make a difference to emissions and therefore their impact on climate change. There is curriculum linked energy education and saving activities and energy related lesson plans and downloadable resources. There are exciting activities for eco-teams to follow and opportunities for schools to compete with other local schools to see who can save the most energy. While working on annual carbon budgets the Council will continue to seek opportunities where driving down the Council's emissions can engage with children and young people. This work will also be supported by the Education and Children's Service own Sustainability and Climate Change Strategy.

Impact Area	Impact
Included	<p>Pupils within schools which are signed up to one of the initiatives in this years Carbon Budget called Energy Sparks will become knowledgeable in energy saving opportunities and be able to share these at home and in the wider community. Pupils will learn new skills and can have an opportunity to lead on different energy saving initiatives as well as work collaboratively across the school and with other schools on the programme. They can feel empowered to make a difference to emissions and therefore their impact on climate change. There is curriculum linked energy education and saving activities and energy related lesson plans and downloadable resources. There are exciting activities for eco-teams to follow and opportunities for schools to compete with other local schools to see who can save the most energy. While working on annual carbon budgets the Council will continue to seek opportunities where driving down the Council's emissions can engage with children and young people. This work will also be supported by the Education and Children's Service own Sustainability and Climate Change Strategy.</p>
Responsible	<p>Pupils within schools which are signed up to one of the initiatives in this years Carbon Budget called Energy Sparks will become knowledgeable in energy saving opportunities and be able to share these at home and in the wider community. Pupils will learn new skills and can have an opportunity to lead on different energy saving initiatives as well as work collaboratively across the school and with other schools on the programme. They can feel empowered to make a difference to emissions and therefore their impact on climate change. There is curriculum linked energy education and saving activities and energy related lesson plans and downloadable resources. There are exciting activities for eco-teams to follow and opportunities for schools to compete with other local schools to see who can save the most energy. While working on annual carbon budgets the Council will continue to seek opportunities where driving down the Council's emissions can engage with children and young people. This work will also be supported by the Education and Children's Service own Sustainability and Climate Change Strategy.</p>

Impact Area	Impact
Respected	Pupils within schools which are signed up to one of the initiatives in this years Carbon Budget called Energy Sparks will become knowledgeable in energy saving opportunities and be able to share these at home and in the wider community. Pupils will learn new skills and can have an opportunity to lead on different energy saving initiatives as well as work collaboratively across the school and with other schools on the programme. They can feel empowered to make a difference to emissions and therefore their impact on climate change. There is curriculum linked energy education and saving activities and energy related lesson plans and downloadable resources. There are exciting activities for eco-teams to follow and opportunities for schools to compete with other local schools to see who can save the most energy. While working on annual carbon budgets the Council will continue to seek opportunities where driving down the Council's emissions can engage with children and young people. This work will also be supported by the Education and Children's Service own Sustainability and Climate Change Strategy.

4.4. Evidence

Type	Source	It says?	It Means?
Other Evidence	https://energysparks.uk/	Energy Sparks is an online, school-specific energy analysis tool & energy education programme that helps schools become more energy efficient and fight climate change.	Schools can save money and the children can become more aware of the ways that they can help to reduce energy use.
External Consultation	https://www.childrensparliament.org.uk/wp-content/uploads/Childrens-Parliament_Climate_Assembly_2021.pdf	This report explains how children have been involved in Scotland's Climate Assembly, and what children across Scotland think needs to happen in Scotland to tackle the climate emergency.	The climate emergency is a human rights issue. Any plan, solution or action to tackle climate emergency in Scotland must respond to the needs, and rights, of everyone living here, and this means listening to the diversity of views and lived experiences of Scotland's citizens. This includes children.
Internal Consultation	Officers across different services	A number of different services within Business, Environment and Infrastructure, Education and Children, and the Health and Social Care Partnership have provided data and information for this report.	Gathered many lists of project ideas and also planned future work some of which have been included as actions for 2022/23 Carbon Budget but also in the Route Map to 2030 for future Carbon Budget years.

Type	Source	It says?	It Means?
Internal Data	Data from across different services on on consumption of energy and waste.	Internal energy, transport and waste consumption data has been used to determine the carbon emissions of the Council. Data has come from Property and Facilities, Transportation, Roads, Landscape, Waste, HR&OD Services.	The data has been used to determine the Council's total annual emissions up to 2020/21.

4.5. Information Gaps

Climate Change information and data changes frequently as the science and research improves. There are likely gaps but we use all the information provided to us by the Scottish Government alongside all other Public Sector bodies.

4.6. Measures to fill Information Gaps

Measure	Timescale
We will continue to consult on documents put forward by the Scottish Government on the expectations of the Public Sector.	Ongoing

4.7. Accounting for the Views of Children and Young People

The report produced by the Children's Parliament and Scotland's Climate Assembly (2020-21) was considered when pulling together the Route map 2030 and Beyond.

4.8. Promoting the Wellbeing of Children and Young People

Reducing emissions from actions within the Council will support a cleaner, safer environment for children / young people and therefore improve their wellbeing. For example, reducing emissions will positively impact air quality, improve biodiversity and supports a future where climate change may not be as impactful as predicted if we do not contribute to reducing global emissions. In addition, children / young people who engage in ways to reduce emissions may find a new interest and therefore could impact their wellbeing by providing exciting opportunities for future development, employment, learning opportunities etc.

4.9. Upholding Children and Young People's Rights

Climate Change is a human rights issue. Any plan, solution or action to tackle climate change in Scotland must respond to the needs, and rights, of everyone living here. Actions in the Route map 2030 and Beyond will also benefit the children the Council look after through its different services. Many of the actions will do this including the energy efficiency measures which will be completed in schools, the Energy Sparks programme and future engagement within the Council's Education and Children Services new Sustainability and Climate Change Strategy.

4.10. Overall Outcome

No Negative Impacts Identified.

Reducing emissions from actions within the Council will support a cleaner, safer environment for children / young people as well as provide exciting opportunities for development and learning.

5. Equalities and Fairer Scotland Duty Impact Assessment

5.1. Protected Groups

Indicator	Positive	Neutral	Negative	Unknown
Age (Younger)		Yes		
Age (Older)		Yes		
Disability		Yes		
Race		Yes		
Religion or Belief		Yes		
Sex		Yes		
Pregnancy and Maternity		Yes		
Sexual Orientation		Yes		
Gender Reassignment		Yes		
Marriage or Civil Partnership		Yes		

5.2. Socio-economic Groups

Indicator	Positive	Neutral	Negative	Unknown
Low income		Yes		
Low wealth		Yes		
Material deprivation		Yes		
Area deprivation	Yes			
Socioeconomic background		Yes		

5.3. Positive Impacts

Impact Area	Impact
Area deprivation	Improving the Council's operational non-domestic building stock to make it more energy efficient can improve the quality of the building and therefore improve the conditions that people who come into contact with our buildings face (internally and externally). This includes the Council's schools, offices, leisure centres etc. Future proofing the Council's estate will therefore support improving area deprivation. In addition to this, the Council's contribution to reducing emissions will also support other social and environmental impacts on area deprivation such as improving air quality and biodiversity.

5.4. Evidence

Type	Source	It says?	It Means?
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Type	Source	It says?	It Means?
External Consultation	https://www.gov.scot/publications/transition-commission-national-mission-fairer-greener-scotland/documents/	The report sets out the view of The Just Transition Commission on key opportunities and challenges for Scotland and recommends practical steps to achieving a just transition.	Fairness and climate ambition must go hand in hand. The pathway to net-zero emissions may be ambitious, but it can be a unique opportunity to build a Scotland that is healthier, fairer and greener.
External Consultation	https://www.climateassembly.scot/full-report	Scotland's Climate Assembly is made up of over 100 citizens from all walks of life tasked with examining expert evidence and agreeing recommendations for tackling the climate emergency in a fair and effective way. This report lays out Scotland's Climate Assembly's recommendations for Scottish society to tackle the climate emergency. It begins with a Statement of Ambition, calling for radical and decisive action, then details 16 goals and 81 recommendations.	It means that Scotland's Public Sector and therefore Aberdeenshire Council have a duty to consider the recommendations put forward by the Assembly and determine ways in which it can support those of which it has direct influence over via the Council's Carbon Budget process.
Internal Consultation	Officers across different services	A number of different services within Business, Environment and Infrastructure, Education and Children, and the Health and Social Care Partnership have provided data and information for this report.	Gathered many lists of project ideas and also planned future work some of which have been included as actions for 2022/23 Carbon Budget but also in the Route Map to 2030 for future Carbon Budget years.
Internal Data	Data from across different services on on consumption of energy and waste.	Internal energy, transport and waste consumption data has been used to determine the carbon emissions of the Council. Data has come from Property and Facilities, Transportation, Roads, Landscape and Waste Services, HR&OD.	The data has been used to determine the Council's total annual emissions up to 2020/21.

5.5. Information Gaps

Climate Change information and data changes frequently as the science and research improves. There are likely gaps but we use all the information provided to us by the Scottish Government alongside all other Public Sector bodies.

5.6. Measures to fill Information Gaps

Measure	Timescale
We will continue to consult on documents put forward by the Scottish Government on the expectations of the Public Sector.	Ongoing

5.7. Engagement with affected groups

Consultation for the production of Route Map 2030 and Beyond has been to review Scotland's Climate Assembly and Children's Parliament reports. These reports represent a range of people who are broadly representative of a population.

5.8. Ensuring engagement with protected groups

There are no impacts identified on those with protected characteristics.

5.9. Evidence of engagement

There has not been engagement to evidence other than the consultation of the documents mentioned above.

5.10. Overall Outcome

No Negative Impacts Identified.

Action to address and improve climate change mitigation and adaptation performance will benefit all staff and residents of Aberdeenshire.

5.11. Improving Relations

Continuous communication across services within Aberdeenshire Council and Aberdeenshire communities will be required to ensure any impacts are identified, considered and mitigated if feasible as early as possible.

5.12. Opportunities of Equality

It is well understood that Climate Change impacts are likely to affect people disproportionately. Any transition through climate change mitigation and adaptation must always be considered just and socially fair so that everyone can benefit from the opportunities and no one is left suffering the consequences worse than others.

6. Sustainability and Climate Change Impact Assessment

6.1. Emissions and Resources

Indicator	Positive	Neutral	Negative	Unknown
Consumption of energy	Yes			
Energy efficiency	Yes			
Energy source	Yes			
Low carbon transition	Yes			
Consumption of physical resources	Yes			
Waste and circularity	Yes			
Circular economy transition	Yes			
Economic and social transition	Yes			

6.2. Biodiversity and Resilience

Indicator	Positive	Neutral	Negative	Unknown
Quality of environment	Yes			
Quantity of environment	Yes			
Wildlife and biodiversity	Yes			
Infrastructure resilience	Yes			
Council resilience	Yes			
Community resilience	Yes			
Adaptation	Yes			

6.3. Positive Impacts

Impact Area	Impact
Adaptation	The Route Map 2030 and Beyond highlights the need for adaptation to be examined in more detail to identify opportunities and actions across the Council. This work will align with mitigation work so that both are being targeted at the same time with action.
Council resilience	By improving energy efficiency and installing renewables such as the solar PVs the Council is already improving its own resilience for future climate change events such as extreme weather events.

Impact Area	Impact
Council resilience	By improving energy efficiency and installing renewables such as the solar PVs the Council is already improving its own resilience for future climate change events such as extreme weather events. The Route Map 2030 and Beyond highlights the need for adaptation and resilience to be examined in more detail to identify opportunities and actions across the Council. Included in this will be the need for infrastructure resilience to be examined in more detail as the Council moves towards electrifying its heat in buildings as it moves away from fossil fuels in line with the targets set for the Public Sector by Scottish Government - zero direct emissions from buildings by 2038.
Infrastructure resilience	By improving energy efficiency and installing renewables such as the solar PVs the Council is already improving its own infrastructure resilience for future climate change events such as extreme weather events.
Infrastructure resilience	The Route Map 2030 and Beyond highlights the need for adaptation and resilience to be examined in more detail to identify opportunities and actions across the Council. Included in this will be the need for infrastructure resilience to be examined in more detail as the Council moves towards electrifying its heat in buildings as it moves away from fossil fuels in line with the targets set for the Public Sector by Scottish Government - zero direct emissions from buildings by 2038.
Quality of environment	By reducing emissions the Council is supporting other benefits for the environment such as improving air quality in the region.
Quality of environment	By reducing emissions the Council is supporting other benefits for the environment such as improving air quality in the region.
Quantity of environment	As mentioned in the Route Map 2030 and Beyond, there is a need for a residual emissions plan to be developed. Part of this work will look at Council land currently available for biodiversity improvement and also insetting opportunities. This will improve the quantity of the environment in the region as the Council moves towards its Net Zero by 2045 target.
Community resilience	The Route Map 2030 and Beyond highlights the need for adaptation and resilience to be examined in more detail to identify opportunities and actions across the Council. Included in this will be the need for infrastructure resilience to be examined in more detail as the Council moves towards electrifying its heat in buildings as it moves away from fossil fuels in line with the targets set for the Public Sector by Scottish Government - zero direct emissions from buildings by 2038. Lessons from this work will feed into Climate Ready Aberdeenshire to ensure opportunities for community resilience is also being considered and supported.

Impact Area	Impact
Wildlife and biodiversity	As mentioned in the Route Map 2030 and Beyond, there is a need for a residual emissions plan to be developed. Part of this work will look at Council land currently available for biodiversity improvement and also inseting opportunities. This work will improve the quantity and quality of the environment in the region enhancing opportunities for wildlife and biodiversity as the Council moves towards its Net Zero by 2045 target.
Consumption of energy	The Carbon Budget report contains a number of projects which will support reducing energy consumption by the organisation. This is through energy efficiency projects as well as projects reducing waste and also reducing energy consumption by the Roads service.
Consumption of energy	The report contains a number of projects which will support reducing energy consumption by the organisation. This is through energy efficiency projects, decarbonising heat in Council buildings, decarbonising the fleet as well as projects reducing waste.
Circular economy transition	The development of a reuse opportunities business case for items coming into the Council's household recycling centres is also a needed outcome within the Route Map. This will include looking at CE potential within the region - considering supply chain and skills development opportunities.
Energy efficiency	The Carbon Budget report contains a number of projects which will support reducing energy consumption by the organisation. This is through energy efficiency projects as well as projects reducing waste and also reducing energy consumption by the Roads service. Many projects are focused on energy efficiency improvements to the some of the operational non domestic building stock.
Energy efficiency	The report contains a number of projects which will support reducing energy usage by the organisation. This is through energy efficiency projects across the operational building stock, decarbonising the fleet, LED streetlighting programme as well as projects reducing waste.
Energy source	The carbon budget includes the addition of solar PVs to some of the Council's non-domestic operational buildings will generate renewable energy.
Energy source	The Route map to 2030 includes the addition of solar PVs to some of the Council's non-domestic operational buildings to generate renewable energy. Other opportunities for renewable energy generation also form part of the Council's Route Map 2030 and Beyond.
Economic and social transition	The Council is demonstrating leadership in reducing emissions through its carbon budget process and therefore is supporting the low carbon transition in the region. Part of the feasibility work as mentioned in the report will also look at local supply chains and skills gaps for energy efficiency and heat decarbonisation in the region. The Council can then look at opportunities to support the growth of these needs in the region.

Impact Area	Impact
Economic and social transition	The Council is demonstrating leadership in reducing emissions through its Route Map 2030 and Beyond development and therefore is supporting the low carbon transition in the region. Part of the feasibility work as mentioned in the report will also look at local supply chains and skills gaps for energy efficiency and heat decarbonisation in the region. The Council can then look at opportunities to support the growth of these needs in the region.
Low carbon transition	The Council is demonstrating leadership in reducing emissions through its carbon budget process and therefore is supporting the low carbon transition in the region.
Low carbon transition	The Council is demonstrating leadership in reducing emissions through Route map 2030 and Beyond development and therefore is supporting the low carbon transition in the region.
Consumption of physical resources	The continued membership to the Warplt reuse online platform means the Council can reduce its consumption of physical resources by ensuring items no longer required in one service can be reused in another part of the Council. The platform links the Council to external organisations also so sharing can happen across the region. In addition energy efficiency projects will reduce the Council's consumption of other resources such as fossil fuel.
Consumption of physical resources	The continued membership to the Warplt reuse online platform means the Council can reduce its consumption of physical resources by ensuring items no longer required in one service can be reused in another part of the Council. The platform links the Council to external organisations also so sharing can happen across the region. In addition, energy efficiency projects will reduce the Council's consumption of other resources such as fossil fuel. The development of a reuse opportunities business case for items coming into the Council's household recycling centres is also a needed outcome of the Route Map.
Waste and circularity	The continued membership to the Warplt reuse online platform means the Council can reduce its consumption of physical resources by ensuring items no longer required in one service can be reused in another part of the Council. The platform links the Council to external organisations also so sharing can happen across the region. Improving food waste recycling in some of the Council's schools will also reduce waste to landfill and will supply circularity through the contract with Keenans which converts the food waste into soil improver for the region.

Impact Area	Impact
Waste and circularity	The continued membership to the Warplt reuse online platform means the Council can reduce its consumption of physical resources by ensuring items no longer required in one service can be reused in another part of the Council. The platform links the Council to external organisations also so sharing can happen across the region. Improving food waste recycling in some of the Council's schools will also reduce waste to landfill and will supply circularity through the contract with Keenan's which converts the food waste into soil improver for the region. The development of a reuse opportunities business case for items coming into the Council's household recycling centres is also a needed outcome of the Route Map.

6.4. Evidence

Type	Source	It says?	It Means?
Internal Consultation	Officers across different services	A number of different services within Business, Environment and Infrastructure, Education and Children, and the Health and Social Care Partnership have provided data and information for this report.	Gathered many lists of project ideas and also planned future work some of which have been included as actions for 2022/23 Carbon Budget but also in the Route Map to 2030 for future Carbon Budget years.
Internal Data	Data from across different services on on consumption of energy and waste.	Internal energy, transport and waste consumption data has been used to determine the carbon emissions of the Council. Data has come from Property and Facilities, Transportation, Roads, Landscape, Waste, HR&OD Services.	The data has been used to determine the Council's total annual emissions up to 2020/21.
External Consultation	https://www.gov.scot/publications/transition-commission-national-mission-fairer-greener-scotland/documents/	The report sets out the view of the The Just Transition Commission on key opportunities and challenges for Scotland and recommends practical steps to achieving a just transition.	Fairness and climate ambition must go hand in hand. The pathway to net-zero emissions may be ambitious, but it can be a unique opportunity to build a Scotland that is healthier, fairer and greener.

Type	Source	It says?	It Means?
External Consultation	https://www.climateassembly.scot/full-report	Scotland's Climate Assembly is made up of over 100 citizens from all walks of life tasked with examining expert evidence and agreeing recommendations for tackling the climate emergency in a fair and effective way. This report lays out Scotland's Climate Assembly's recommendations for Scottish society to tackle the climate emergency. It begins with a Statement of Ambition, calling for radical and decisive action, then details 16 goals and 81 recommendations.	It means that Scotland's Public Sector and therefore Aberdeenshire Council have a duty to consider the recommendations put forward by the Assembly and determine ways in which it can support those of which it has direct influence over via the Council's Carbon Budget process.
Other Evidence	Public Sector Leadership on the Global Climate Emergency	The guidance is in part to support the Climate Change (Duties of Public Bodies: Reporting Requirements) (Scotland) Amendment Order 2020 which set out additional requirements and expectations for Public Body response to the Climate Emergency.	The document lays out consideration for Public Sector Bodies to embed climate change action across the organisation in order to reduce emissions in line with the National targets. Aberdeenshire Council's Carbon Budget process supports some of these expectations and the Route Map 2030 and Beyond addresses the current gaps.

6.5. Information Gaps

Climate Change information and data changes frequently as the science and research improves. There are likely gaps but we use all the information provided to us by the Scottish Government alongside all other Public Sector bodies.

6.6. Measures to fill Information Gaps

Measure	Timescale
We will continue to consult on documents put forward by the Scottish Government on the expectations of the Public Sector.	Ongoing

6.7. Overall Outcome

No Negative Impacts Identified.

The Route Map 2030 and Beyond identifies many opportunities which will support a reduction in the Council's own emissions demonstrating a positive impact towards supporting action on climate change mitigation and adaptation.

REPORT TO SUSTAINABILITY COMMITTEE – 15 JUNE 2022

UK EMISSIONS TRADING SCHEME (UK ETS) UPDATE

1 Executive Summary/Recommendations

1.1 This report updates the Sustainability Committee on the proposals for the development of the UK Emissions Trading Scheme (UK ETS) as set out in the UK Government consultation [Developing the UK Emissions Trading Scheme \(UK ETS\)](#). The UK ETS is a significant scheme for various economic sectors which is why this report is being presented to the Committee.

1.1.1 As the proposals have limited direct interaction with Council business the Council is not planning to submit a full consultation response (deadline 17 June 2022). However, Chapter 7 of the proposals covers a call for evidence on expanding the UK ETS to include waste incineration and energy from waste and this report does highlight the draft response to these proposals from the [NESS Energy Project](#) in which Aberdeenshire Council is a partner.

1.2 The Committee is recommended to:

1.2.1 Note the proposals for development of the UK ETS;

1.2.2 Consider and comment on the potential for the proposals under the scheme to impact upon future activities in Aberdeenshire; and

1.2.3 Note the draft response to Chapter 7 of the proposals as set out at Appendix 1.

2 Decision Making Route

2.1 After leaving the EU Emissions Trading Scheme (EU ETS) the UK had a choice between establishing UK carbon taxes or a UK ETS. A UK ETS was chosen and commenced on 1 January 2021. The open consultation [Developing the UK Emissions Trading Scheme \(UK ETS\)](#) was published on 25 March 2022.

2.2 The UK ETS is a significant scheme which impacts and has potential to impact a number of industries, either directly or indirectly. Being aware of this scheme would allow Councillors to understand the potential impacts on local sectors and to potentially provide support and direction to the Council and local businesses as the scheme evolves.

3 Discussion

3.1 The UK ETS is a system where the government sets a total permitted amount of greenhouse gas emissions for selected areas of the economy and then sells 'allowances' to emit, which can be used to cover generated emissions or sold on. Within the scheme there is also a number of free allowances given to selected industries or areas of the economy based on perceived need.

- 3.2 This discussion section provides key points from the nine chapters of the [Developing the UK Emissions Trading Scheme \(UK ETS\)](#) document, as well as referencing (**Appendix 1**) the proposed response to Chapter 7 from the [NESS Energy Project](#) in which Aberdeenshire Council is a partner.

Glossary of terms

Allowance	A permit under the UK ETS that allows the owner to emit a certain amount of specified greenhouse gas emissions.
The Authority	UK Government, Scottish Government, Welsh Government and the Department of Agriculture, Environment and Rural Affairs for Northern Ireland, (DAERA).
Cap	Upper limit on the total amount of certain greenhouse gases that can be emitted by sectors covered by the scheme.
Carbon leakage	Where production and associated greenhouse gas emissions are offshored to other jurisdictions with different policies.
Free allocation	Free Allowances awarded by the Authority selected industries or areas of the economy based on perceived need. Free Allocation is considered a mechanism to prevent carbon leakage.
Stationary sector	The UK ETS applies to energy intensive industries, the power generation sector and aviation. The stationary sector refers to the non-aviation sectors.

3.3 Chapter 1: Net zero consistent cap

'Sets out proposals for changes to align the UK ETS cap and trajectory with our net zero target.'

- 3.3.1 The cap trajectory is based on the recent UK Government's Net Zero Strategy and provides the foundation for the net zero consistent cap trajectory from 2024. The current cap will remain in place until the end of 2023 to maximise the period of notice to the market from the date of this consultation. It would allow a total cap for the entire first Phase (2021-2030) of between 887 million allowances and 936 million allowances. Compared to the current legislated cap for the whole phase – 1365 million allowances – this would equate to a reduction of between around 30-35% over the course of the phase. The range reflects the fact that there is some degree of uncertainty in expected sectoral emission reductions and in other key assumptions. The Authority is currently minded to set the cap towards the higher end of the range. However the final trajectory, wherever it is set within this range, will be subject to consultee views and updated assessments of emissions abatement progress across all

sectors and regions, reflecting different nations' ambition in the 2020s. The Authority will assess the final level of the cap needed in order to achieve the four nations' carbon targets, taking all this evidence into account, and a finalised position will be set out in the government response to this consultation.

3.4 Chapter 2: Free allocation review

'Considers the role of Free Allocation policy as a carbon leakage mitigation tool in the context of the net zero aligned cap. It also puts forward potential improvements to the current Free Allocation regime based on stakeholder views expressed in response to the 2019 consultation on carbon pricing and the call for evidence on free allocation in 2021.'

- 3.4.1 This chapter focuses on changes to free allocations for the stationary installations energy intensive industries and the power generation sector (excluding aviation). It also puts forward potential improvements to the current free allocation regime. This is based on stakeholder views expressed in response to the 2019 consultation on carbon pricing and the call for evidence on free allocation in 2021.
- 3.4.2 The review from the call for evidence will be conducted in two phases. The first phase will look at aligning the share of free allocation within proposed changes to the overall UK ETS cap. These top-down changes will be implemented during 2024. In addition, some technical amendments will be made to the scheme to address discrepancies. The second phase will focus on the methodology for distributing free allocation to participants. These bottom-up changes will be implemented by 2026 to align with the second allocation period of the UK ETS.
- 3.4.3 The industry cap sets an upper bound on free allocations that can be issued each scheme year. Under current scheme rules the industry cap is set at the UK's notional share of the EU ETS industry cap for Phase IV of the EU ETS. This equates to around 58 million allowances in 2021 and will reduce annually by around 1.6 million allowances.
- 3.4.4 As the overall cap tightens to align with our net zero targets, fewer allowances will be available each year over the course of the first phase of the UK ETS (2021-2030). To avoid any unintended impacts to market functioning, stability, or liquidity which could arise if free allocations made up the majority of allowances under the cap, the Authority is considering changes to the industry cap. As part of this consultation, it is setting out the broad options and guiding principles it will use to decide which industry cap is most suitable for the scheme going forward. The Authority's preferred industry cap option will be decided upon following analysis of consultation responses and presented alongside a decision on the absolute level of the cap and impacts analysis.
- 3.4.5 To maintain the market signal which the UK ETS sends to incentivise participants to decarbonise, it is desirable that auctioning continues to be the main way of bringing allowances to the market, ensuring that a price on

emissions is established. Resetting the industry cap to make up a percentage of the overall cap rather than being set as fixed numbers, as in current legislation is the approach being pursued by the Authority. This is due to the impacts to market functioning and liquidity, credibility of the UK ETS as an environmental policy, and as an incentive to decarbonise.

- 3.4.6 The Authority is mindful of the impacts that may be felt by operators which receive free allocations as the net zero consistent cap is implemented. It is committed to ensuring that these impacts are mitigated in the near term, giving industry time to adapt and factor these into their investment decisions. The Authority will use its reserve of unallocated allowances or the flexible share to mitigate against any reduction to free allocations for the first allocation period, 2021-2025. The Authority will also consider using a lower or higher proportion of the overall cap than 37% and will set out the exact figures as well as reasoning as part of the government response.
- 3.4.7 As part of the next stage of the review the Authority will look at the current methodology for distributing free allowances and will explore ways to better target free allocations for those most at risk of carbon leakage and ensure they are fairly distributed. They aim to consult on the future changes in 2023 with implementation ready for 2026. A range of approaches could potentially help to address carbon leakage which is caused by different countries mitigating emissions at different rates. The Authority will be publishing more analysis on the possible risks of carbon leakage from the UK in further consultations as part of the Free Allocation Review. This will inform possible changes to free allocation policy to better improve carbon leakage mitigation within the UK ETS.

3.5 **Chapter 3: Unallocated free allowances and flexible share**

'Sets out proposals for bringing in unallocated allowances and/or the flexible share to the market.'

- 3.5.1 Unallocated allowances result from the number of free allowances distributed to operators being below the industry cap, which sets the maximum number of free allowances that can be allocated to stationary operators, in a given scheme year. The flexible share is a pot of allowances representing 3% of the cap for the 2021-2030 trading period. Unallocated allowances and the flexible share currently serve two legislative functions:
1. They can be used to mitigate the application of a Cross-Sectoral Correction Factor (CSCF) which is applied when a number of allowances allocated for free in a scheme year is higher than the industry cap applying a proportionate reduction to each participant's free allocations.
 2. They can be drawn from by the Cost Containment Mechanism (CCM) which is a tool for the Authority to intervene if auction prices are elevated for a sustained period, causing market instability.
- 3.5.2 Neither unallocated allowances nor the flexible share have so far been utilised through existing mechanisms in legislation. This pool of allowances is

expected to grow in the 2022-2023 period, as free allowances will continue to be below the industry cap. The Authority is considering options to bring these allowances to market in this consultation.

- 3.5.3 The implementation of the net zero consistent cap in 2024 will require a significant drop in allowances reaching the market in 2024 compared to previous years. The Authority is considering bringing a portion of 2021-2023 unallocated allowances and/or flexible share to auction, to smooth the transition to the net zero cap. The exact timing of the release of additional allowances into auction would also need to be considered. This would provide a level of support to market participants in the transition to a net zero consistent cap by increasing the supply of auctioned allowances. It would also provide a direct route to market for unallocated allowances and/or the flexible share, supporting market liquidity. The Authority also intends to retain a portion of unallocated allowances and/or flexible share for market stability uses.

3.6 **Chapter 4: A call for evidence on future markets policy**

'Calls for evidence on potential drivers of evolving market conditions in the UK ETS and objectives for market stability policy as the scheme evolves.'

- 3.6.1 The launch of the UK ETS has created a new marketplace for buying and selling 'allowances' to emit certain greenhouse gases. Markets can be inherently volatile but stability in the market for allowances would instil confidence and allow for better planning from those involved in the market. This section includes consultation on policy measures to regulate various aspects of the allowances market.

3.7 **Chapter 5: Aviation**

'Sets out the scope of the review into UK ETS aviation policy. This includes proposals on the future of aviation free allocation, considering responses to the 2019 consultation on carbon pricing, the 2021 call for evidence, and UK government commissioned economic research. It also considers how the use of Sustainable Aviation Fuels (SAFs) could be incentivised under the UK ETS and options for expanding the coverage of the scheme within the aviation sector.'

- 3.7.1 Aviation is one of the sectors covered by the UK ETS. The UK ETS covers domestic UK flights, flights from the UK to the European Economic Area (EEA), and flights between the UK and Gibraltar. In 2019, these flights made up 44% of all commercial flights to and from UK airports. The aviation sector currently receives a proportion of UK ETS allowances for free, which they can use towards their scheme obligations. The free allocation policy instrument in general aims to mitigate carbon leakage (definition below) and support industry competitiveness.
- 3.7.2 The consultation questions around free allocation include the ways in which the free allocations should be distributed among the industry to be as fair as

possible and also over what timescale these free allocations should be phased out.

3.7.3 Question 57 of the consultation asks about ways that any unintended impacts on regional connectivity through the UK ETS could be mitigated.

3.7.4 The Council officers who link to the aviation sector via economic development and transport will ensure that the links between the UK ETS proposals are flagged to key partners.

3.8 **Chapter 6: Expanding UK ETS coverage within covered sectors**

'Sets out proposals and calls for evidence on possible changes to the rules for sectors currently covered by the UK ETS to ensure more greenhouse gas emissions are covered by the scheme.'

3.8.1 The inclusion of venting and flaring (releasing and burning respectively) of excess gas is included in the UK ETS consultation. Although focused on the oil and gas sector it is of relevance to other sectors that vent or flare. Council landfill sites include passive venting and flaring of methane and carbon dioxide so there is potential for these to be considered for inclusion and officers will provide comments to the consulting Authority.

3.8.2 There is a proposal to expand the UK ETS to allow for transportation of CO₂ through other means than pipeline (e.g. shipping, rail, road) for onward carbon capture without surrendering allowances. The status quo would negatively affect those looking to capture carbon when having to use alternative transportation (i.e not a pipeline) to the carbon capture site. This could potentially impact carbon capture and storage projects in Aberdeenshire, such as [The Acorn Carbon Capture and Storage Project](#) and officers are engaging with the promoters of that project on this matter.

3.8.3 Proposals are to apply sustainability criteria to biomass use in all installations to ensure a consistent approach between the UK ETS and other biomass policies. Power generating installations that are biomass only would be exempt from the UK ETS but those using fossil fuels in addition to biomass would be captured. There are also questions relating to the thresholds in terms of thermal energy produced for installations that would be required to participate in the UK ETS. Depending on the set thresholds there is potential for Council generators to be impacted and officers are keeping this under review.

3.9 **Chapter 7: Expanding the UK Emissions Trading Scheme to new sectors**

'Sets out proposals to expand the scope of the UK ETS to the domestic maritime sector and calls for evidence on expanding the UK ETS to include waste incineration and energy from waste.'

- 3.9.1 The Authority has committed to continue exploring options for expanding carbon pricing beyond energy intensive industries, the power generation sector and aviation, to which the UK ETS currently applies.
- 3.9.2 For the domestic maritime sector the aim of the Authority is to price in some of the externalities of conventional marine fuels, encouraging investment in energy efficiency and alternative fuels. It is proposed that emissions would be calculated based on the volume of fuel multiplied by the carbon intensity of the fuels. The consultation covers proposals to expand the UK ETS to domestic maritime by the mid-2020s under either a vessel activity basis, a fuel supplied basis or a hybrid approach.
- 3.9.3 There is also a proposed UK ETS expansion to cover waste incineration with no energy recovery, and energy from waste (EfW) by the mid to late 2020s. The consultation on this area covers the scope of proposals, monitoring, the reporting and verification of emissions, impacts on the market and interaction with planned and existing policies.
- 3.9.4 The proposed response from the [NESS Energy Project](#), in which Aberdeenshire Council is a partner, to the calls for evidence on expanding the UK ETS to include waste incineration and energy from waste is given in **Appendix 1**.

3.10 **Chapter 8: Calls for evidence on greenhouse gas removals (GGRs) and agriculture and land use emissions**

'Calls for early views on the incorporation of greenhouse gas removal (GGR) into the UK ETS and the monitoring, reporting and verification requirements necessary to address greenhouse gas emissions in the land use and agriculture sectors. We do not propose expanding the UK ETS to agriculture.'

- 3.10.1 It is recognised that certain industries, such as aviation and agriculture, will be difficult to totally decarbonise by 2050, and using GGRs will be crucial in compensating for the residual emissions coming from the most challenging areas of the polluting sectors. An object of the consultation is to assess whether and how the UK ETS can be used as one potential approach to support GGR growth and deployment, and how this would impact the functioning of the UK ETS.
- 3.10.2 A further consultation in 2022 will seek preferred business models to incentivise early investment in engineered GGRs with the aim of deployment from the mid-to-late 2020s. There is also ongoing academic research looking at integrating GGRs into cap-and-trade markets and how they should be approached as a path to Net Zero.
- 3.10.3 Six key opportunities of integrating GGRs into the UK ETS are outlined, including: helping UK meet net zero targets; greater focus on co-benefits from increased nature-based solutions; and ramping up of GGR development and deployment. There are however several key considerations including: GGRs

possibly weakening the overall incentive to decarbonise; and issues surrounding monitoring, reporting and verification.

- 3.10.4 It is noted that agriculture has the potential for positive and negative emissions. Some farms may store and sequester carbon through afforestation or sell carbon services to supply chain partners. For agriculture an object of the consultation is to assess the potential for Monitoring, Reporting and Verification (MRV) in agriculture to improve business level decisions and productivity, and to reduce greenhouse gas emissions from food growing (excluding transportation and processing). The proposed benefits of MRV are transparency and confidence in traded carbon, better informed decisions by food producers, retailers, and government, understanding of source and scale of emissions, and prioritisation of mitigation efforts.

3.11 **Chapter 9: Operational amendments to UK ETS**

'Sets out proposed amendments to support effective operation of the UK ETS by addressing a number of operational issues identified during the development of policy and legislation for the scheme.'

- 3.11.1 This section calls for views on a number of different issues related to the operation of the UK ETS and proposals including the following:
- Electricity Generators exporting heat for district heating but who have not been able to export measurable heat produced in the 'relevant period' do not currently qualify for free allocation. Responses are being sought to ascertain if they should be able to demonstrate eligibility and over what period this would be necessary.
 - New entrants to the UK ETS can potentially have their free allocation for a year based on a very limited time frame if they begin operations late in the previous year. The proposal states that they should wait until a full calendar year of information is available before being able to apply for the free allocation.
 - Proposal for additional statutory appeal routes against Authority decisions which would apply to specific decisions impacting individual operators (rather than appealing against the overall policy).
 - Proposal to introduce two new penalties for 'Failure to submit information' and 'Failure to comply with notification requirements'.

4 **Council Priorities, Implications and Risk**

- 4.1 This report links to the Economy and Enterprise Priority under the Our Economy Pillar of Aberdeenshire Council's strategy on account of the UK ETS being a significant national scheme with potential to impact a number of industries, either directly or indirectly. It also links to the Infrastructure Priority under the Our Environment Pillar through the NESS Energy Project, in which

Aberdeenshire Council is a partner. Additionally, it also relates to the climate and sustainability principle underpinning the Aberdeenshire Council priorities.

4.2 The table below shows whether risks and implications apply if the recommendations are agreed.

Subject	Yes	No	N/A
Financial			X
Staffing			X
Equalities and Fairer Duty Scotland			X
Children and Young People's Rights and Wellbeing			X
Climate Change and Sustainability			X
Health and Wellbeing			X
Town Centre First			X

4.3 The screening section as part of Stage One of the Integrated Impact Assessment process has not identified the requirement for any further detailed assessments to be undertaken. This report is only providing an update on a UK Government consultation and providing opportunity for Councillors to review and provide comment.

4.4 The following Risks have been identified as relevant to this matter on a Corporate Level:

- ACORP002 Changes in government policy, legislation and regulation

5 Scheme of Governance

5.1 The Head of Finance and Monitoring Officer within Business Services have been consulted in the preparation of this report and their comments are incorporated within the report and are satisfied that the report complies with the Scheme of Governance and relevant legislation.

5.2 The Committee is able to consider this item in terms of Section R paragraphs 1.1a and 1.1c of the List of Committee Powers in Part 2A of the Scheme of Governance as it relates to approving, reviewing and monitoring the Council's work in respect of sustainable development and climate change.

Alan Wood
Director of Environment and Infrastructure Services

Report prepared by Joel Evans, Circular Economy Officer
Date 6 June 2022

List of Appendices:

Appendix 1 - NESS Energy Project proposed response to UK ETS consultation



Aberdeen City Council | Aberdeenshire Council | Moray Council

Draft Response by the Ness Energy Project to UK ETS Consultation – Inclusion of EfW in ETS

1. The UK Government Department for Business, Energy and Industrial Strategy is undertaking a consultation on the UK Emissions Trading Scheme (UK ETS), essentially a UK only version of the existing EU Emissions Trading Scheme.
2. The consultation addresses a number of areas of proposed change with one area of direct impact to Local Authorities in particular. The consultation includes the intention to expand the scope of ETS to include fossil carbon emissions from Energy from Waste (EfW) facilities, which have hitherto been exempt.
3. The UK ETS is a 'cap and trade' scheme, where in scope facilities/activities that emit carbon dioxide have to make a payment for each tonne emitted beyond its allowance. The trading element means that the value of this payment varies according to market conditions.
4. The key impact for the Council is that the gate fee for delivering waste to the Ness EfW facility being developed under the Inter-Authority Agreement between Aberdeen City, Aberdeenshire and the Moray Councils is likely to increase significantly.
5. The consultation proposes that the inclusion of EfW into the UK ETS will occur in the mid-late 2020s. Accordingly, there is no direct financial impact until that point and estimating the cost to the Authority would be speculation at this point.
6. Draft Consultation responses have been developed as outlined below. The key points can be summarised as:
 - The response agrees that the inclusion of EfW into the UK ETS is compatible with the objectives of achieving Net Zero.
 - That there is currently no viable and affordable carbon sequestration supply chain and it is uncertain when this will develop.
 - Introducing UK ETS without viable mitigation options for the industry simply results in a tax income for UK government at the expense of increased costs for Local Authorities.
 - Introduction of UK ETS should be phased alongside the development of carbon sequestration outlets and that no date should be fixed at this stage.
 - Local Authorities should be compensated for their increased costs.

- A mechanism for rewarding facilities that achieve negative emissions (such as EfW with carbon capture) should be developed immediately in order to make investment viable.

7. The consultation document can be found here:

<https://www.gov.uk/government/consultations/developing-the-uk-emissions-trading-scheme-uk-ets>

Question	Draft Response
<p>Question 93. Do you agree with the Proposal that the UK ETS be expanded to allow for the transportation of CO2 through other forms of non-pipeline transport (i.e. shipping, rail and road)? (Y/N) Please explain your answer.</p>	<p>Yes, achieving Net Zero will require more than connecting those facilities conveniently close to a pipeline, as a result all facilities across the UK should have as equal treatment under the Scheme as possible in order to maximise CO2 emissions reduction.</p>
<p>Question 94. Do you have any evidence to suggest how expanding the UK ETS to include other forms of CO2 transport may impact the wider UK ETS or other policy areas of the Governments of the UK, either positively or adversely? For example considering the impacts of emissions produced by chosen means of transport. (Y/N) Please explain your answer.</p>	<p>No specific evidence to offer, however, there is logic in considering the net impact for all delivery methods including pipelines, which require significant energy inputs in themselves. Such a measure should encourage the development and utilisation of non-carbon emitting means of shipping (e.g. using hydrogen or electricity derived from renewable sources).</p>
<p>Question 95. What mitigation strategies, if any, do you believe should be applied in relation to CO2 emissions associated with all forms of CO2 transport for CCUS (eg. emissions produced by a cargo ship or those associated with the operation of pipelines)? For example, a mitigation strategy might include the requirement for</p>	<p>Net carbon delivered to sequestration should be adopted as the key measure. Mitigation in transport should be achieved by decarbonising the electricity and hydrogen production sectors, which can then be used to power transport modes.</p>

<p>a chosen means of transport to adhere to emissions standards, net proportion of emissions delivered criteria (after deduction of emissions from transportation) or similar sustainability criteria.</p>	
<p>Question 124. Do you agree with the proposed timing for when waste incineration and EfW could be introduced into the UK ETS? (Y/N)</p>	<p>No.</p>
<p>Question 125. For operators of waste incinerators, EfW plants, and local authorities (LAs), please outline the steps that you will need to take, and the time required to prepare for the expansion of the UK ETS to waste incineration and EfW.</p>	<p>No date should be fixed for the introduction of EfW into UK ETS until there is more clarity on the implications for the sector, the waste industry and the development of suitable carbon capture utilisation and storage opportunities as an alternative to what otherwise can be characterised as a simple tax raising exercise. Furthermore, UK ETS should not be introduced until a clear mechanism is established for valuing carbon negative solutions in EfW - this issue has not been addressed in this consultation and that is considered a significant lost opportunity. The right time to introduce UK ETS is when outlets that permanently sequester carbon dioxide and reward investment in carbon negative solutions are clearly established. It may be that this can be achieved by the late-2020s, however existing facilities and contracts will require significant modification and investment to achieve carbon negative performance and this should be factored into the timing of implementation. Local Authorities are a significant tonnage contributor to UK EfW with government policy, especially in Scotland, driving local authorities to invest in EfW in recent years. UK ETS introduces a new fiscal burden they are poorly positioned to be able to absorb and therefore are likely to face very significant financial hardship from UK ETS</p>



	<p>introduction. The consultation provides no explanation of how local authorities will be compensated for the imposition of an additional central government tax and therefore steps will be required to resolve this net reduction in local authority funding. The clear, obvious and fair solution is for the UK and devolved Governments to amend local authority fiscal settlement. Without such a step it is impossible to identify what steps local authorities would have to take to achieve their statutory requirement to achieve balanced budgets, however it is inevitable that an increase in spending in one area requires a reduction in another, as a result, other areas of local government spending, for example education and social care may need to be reduced.</p>
<p>Question 126. Do you agree that the UK ETS should be expanded to include waste incineration and EfW? (Y/N) Please outline your reasoning, including alternative options for decarbonisation of the sector outside of the UK ETS.</p>	<p>Yes. Local Authorities are committed to achieving Net Zero and therefore it is recognised that steps must be taken to reduce and eliminate carbon emissions from EfW. Indeed, the sector has the rare opportunity to be carbon negative. There are currently irreconcilable financial challenges in achieving decarbonisation not to mention the lack of viable outlets for carbon captured. Applying a cost to the release of CO₂ to atmosphere from EfW can be argued to be a logical extension from the current scope, however, certain conditions must be in place to achieve a fair and successful transition to Net Zero. Firstly, realistic and financially comparable decarbonisation solutions must be available, secondly, as EfW is only a small element of the resource management sector, the impact of introduction of UK ETS for EfW must be fully understood for all other residual waste treatment alternatives, especially landfill and export of waste to jurisdictions where the costs arising from UK ETS do not apply, for example the EU and thirdly the financial impact on local</p>



	<p>authorities must be mitigated to avoid unintended consequences, such as other services local authority services being degraded in order to pay the tax. Achieving these requirements will take time and careful policy making from UK and Devolved Governments, accordingly, the timing of the introduction of UK ETS should not be arbitrarily set at this time.</p>
<p>Question 127. Do you agree that all types of waste incinerators should be included in the UK ETS? (Y/N) If you believe certain incineration activities should be exempt, e.g. incineration of hazardous or certain healthcare waste, please provide details and specify which waste stream.</p>	<p>Yes. If the scheme is to be introduced then it should apply to all areas. The climate impact is the same irrespective of where carbon is emitted. There is a case to argue that the impact of UK ETS on high-value waste streams such as hazardous and health care waste is proportionally less than for household waste and therefore the sector will be better placed to absorb the impact.</p>
<p>Question 128. Do you believe ATT should be included in the UK ETS? (Y/N) What challenges could arise as a result of including ATT, if any, that are different to conventional waste incineration plants?</p>	<p>Yes. Any facility treating residual waste and emitting fossil carbon should be included in the UK ETS if it is to be introduced. There is no evidence that so-called Advanced Thermal Treatment (ATTs) deliver significant carbon reduction performance compared to proven technologies. Indeed, despite significant subsidy and favourable market conditions these technologies have, on the whole, actually resulted in adverse outcomes through low availability and requirement to divert wastes to higher carbon emitting outlets such as landfill.</p>
<p>Question 129. Do you agree that the point of MRV obligation for the UK ETS should be placed on the operators of waste incinerators and EfW plants? (Y/N) Please outline your reasoning in as much detail as possible and provide evidence to support your views.</p>	<p>Yes. The operator is the only body that has access to all the information required to undertake monitoring, reporting and verification. The operator controls the inputs, processing and emissions and has data capture capability. The operator will, of course, require to be regulated in this regard and this role should be undertaken by SEPA or the relevant regulators in other jurisdictions.</p>



<p>Question 130. If the point of MRV obligation is placed on operators of waste plants, should waste companies/operators or customers (either LAs or commercial and industrial customers) be responsible for meeting compliance obligations? (Y/N) Please outline your reasoning in as much detail as possible and provide evidence to support your views.</p>	<p>No. The Polluter Pays Principle should apply as this is the best way to influence the behaviour of the producer to reduce the carbon impact of its waste, however, at this early stage, there is not an obvious mechanism for how such obligations could be applied when there may be dozens of suppliers of waste to an EfW Facility - whilst tonnage of inputs is identifiable, fossil carbon content is not and would require significant costs and complication in measuring this prior to combustion. For this reason, the obligation should sit with the facility operator initially. The operator has the opportunity to reflect the financial impact of UK ETS in its gate fee and thereby recover its costs.</p>
<p>Question 131. Do you believe that the Small and Ultra Small Emitter schemes that are currently available to eligible UK ETS participants should also be available to waste incinerators and EfW plants? (Y/N) Please provide details including, where relevant, whether your organisation is likely to be eligible for these schemes based on current rules.</p>	<p>Yes. Simply for consistency. EfW carbon is not different to any other carbon.</p>
<p>Question 132. Which MRV proposal do you believe should be implemented to determine the UK ETS obligation for waste incinerators and EfW plants?</p> <p>i) If Option A, please provide your views on which methods could be used, along with any information on the practicality of their implementation and likely costs.</p>	<p>Option A is preferred as it more clearly reflects the actual emissions of each facility. Given that waste composition and the mix of waste types accepted at EfW facilities are highly variable the use of emissions factors is considered to be too crude an instrument. The respondent is not sufficiently qualified to comment on how Option A would be implemented.</p>



<p>ii) If Option B, please provide your views on how these emissions factors should be calculated, along with any information on the practicality of implementation and likely costs. In your answer, please outline how frequently fossil emissions should be monitored under both options and consider whether there are other suitable MRV options that we have not identified.</p>	
<p>133) Do you believe that one of the MRV options proposed is more likely to lead to perverse incentives (e.g. more waste diverted to landfill) or to unintended consequences as a result of applying the UK ETS to waste incineration and EfW? Please consider different scenarios and provide evidence to support your views where possible.</p>	<p>No comment.</p>
<p>134) Do you believe any additional greenhouse gases, other than CO₂, that are emitted by EfW plants or incinerators, should be covered by the UK ETS? (Y/N) If so, please provide details on which gases and how it could work in practice.</p>	<p>No. The EfW UK ETS should, at least initially, mirror the established UK ETS approach. Any change should be applied across sectors.</p>
<p>135) How would the application of an ETS to waste incineration and EfW impact stakeholders (including operators of waste incinerators, operators of EfW plants, LAs, consumers, customers)?</p>	<p>Local Authorities are a significant tonnage contributor to UK EfW with government policy, especially in Scotland, driving local authorities to invest in EfW in recent years. UK ETS introduces a new fiscal burden they are poorly positioned to be able to absorb and therefore are likely to face very significant financial hardship from UK ETS introduction. The</p>



consultation provides no explanation of how local authorities will be compensated for the imposition of an additional central government tax and therefore steps will be required to resolve this net reduction in local authority funding. The clear, obvious and fair solution is for the UK and devolved Governments to amend the local authority fiscal settlement. Without such a step it is impossible to identify what steps local authorities would have to take to achieve their statutory requirement to achieve balanced budgets, however it is inevitable that an increase in spending in one area requires a reduction in another, as a result, other areas of local government spending, for example education and social care may need to be reduced. Ultimately, the introduction of carbon pricing into waste management should contribute to the implementation of carbon reduction measures. These measures would include seeking to reduce the fossil carbon content of incoming waste streams, which in turn will change the operating capacities of EfW facilities with uncertain impacts on operation and profitability. At this stage it is difficult to see how the introduction of additional financial burden on the industry will directly lead to carbon reductions when there is no established treatment or sequestration network in place and so the negative impact of increased cost will not be balanced by environmental improvements. Many local authorities, taking their lead from national policy and regulation have invested in EfW solutions and will have to enter into contractual negotiations with operators of EfW facilities to manage the change in cost base and, should the Carbon Capture Usage and Storage (CCUS) industry develop sufficiently, potentially modify facilities to incorporate carbon capture. Such contract change will require very significant resource to

	negotiate and finance additional infrastructure, such resources not being available at a time of severe financial constraint.
<p>136) Could the introduction of a carbon price incentivise waste operators and/or LAs to improve their operations or processes to reduce fossil waste being incinerated? (Y/N) Please outline your reasoning in as much detail as possible and provide evidence to support your views.</p>	<p>Yes, depending on the price set and the availability of reliable and affordable techniques to decarbonise waste inputs and emissions. It is recognised that more can be done to remove more fossil carbon from input wastes, however, the fate of such fossil carbon (mostly poor quality and currently unrecyclable plastic) must be considered. Shifting the plastic into a sector which potentially leads to carbon emissions not covered by the ETS (for example, 'chemical recycling' or landfill of mixed wastes) is a real risk. However successful upstream actions to reduce fossil carbon content in mixed waste are, they are unlikely to result in the complete removal of fossil carbon from the mixed waste stream. As a result, EfW - an essential part of the resource management system - will continue to be required. Decarbonising these emissions can only be achieved if the downstream sequestration/utilisation sector is mature. EfW facilities are typically small to medium scale producers and therefore are reliant on these sectors, so operators and local authorities can only be 'second-movers' in this scenario.</p>
<p>137) Could the introduction of a carbon price incentivise LAs to support households to improve recycling practices? (Y/N) Please outline your reasoning in as much detail as possible and provide evidence to support your views.</p>	<p>Yes, depending on the price set and the availability of reliable and affordable techniques to remove more fossil carbon from input wastes, however, the fate of such fossil carbon (mostly poor quality and currently unrecyclable plastic) must be considered. Shifting the plastic into a sector which potentially leads to carbon emissions not covered by the UK ETS (for example, 'chemical recycling' or landfill of mixed wastes) is a real risk.</p>



<p>138) Is there opportunity (in the medium-long term) for the carbon price to incentivise waste operators and/or LAs to invest in carbon capture and storage infrastructure, to reduce fossil carbon emissions? (Y/N) Please outline your reasoning in as much detail as possible and provide evidence to support your views.</p>	<p>Yes. Local Authorities are committed to achieving Net Zero and therefore will be inclined to implement affordable measures that contribute to that goal. Key issues are timing and funding. The absence of a viable downstream carbon sequestration sector for most EfW facilities means that such investment is certainly not viable without significant financial and risk underwriting by national governments. Should such a sector develop, the cost of carbon capture and shipping is considered to be significantly higher than the current carbon price. This situation may change over time but it is not currently possible to envisage a business case that recommends investment. A major opportunity to shift the financial balance is available if the UK ETS recognised that value of carbon negative 'emissions'. EfW is one of few sectors where actions to remove fossil carbon from emissions also delivers sequestration of biogenic carbon. UK and devolved governments recognise that carbon negative activities will be essential to achieving Net Zero and should therefore develop as quickly as possible a mechanism to reward negative emissions. This development would significantly close the gap between the cost of compliance with UK ETS and the cost of implementing carbon capture.</p>
<p>139) In the event of the carbon price being applied to waste operators, will waste operators be able to pass through their costs to customers (including LAs)? (Y/N) Please explain in as much detail as possible why, how, and to what extent this may or may not occur.</p>	<p>There is no Yes/No answer to this question as it will depend on the nature of the contracts held between operators and customers, including Local Authorities. Many larger, longer-term contracts are believed to include Change of Law provisions and that this may enable cost recovery by the operator.</p>
<p>140) For LA owned plants, would unitary authorities and waste disposal authorities be the only authorities exposed to the carbon</p>	<p>Yes, although part of the municipal waste stream comprises business waste and therefore the Authority would be expected to</p>



<p>price – in the event of waste operators passing through costs? (Y/N) Please explain in as much detail as possible and provide evidence to support your views.</p>	<p>recover the cost associated with this waste from business</p>
<p>141) Do you believe that government should consider phasing in ETS obligations to the sector over time? (Y/N) If yes, please outline why, how, and to what extent phasing options could be provided</p>	<p>Yes. UK ETS implementation should be mirrored to the availability of mitigation measures. For local authorities, unless and until viable carbon sequestration outlets are available (for fossil carbon produced both pre- and post- EfW), the UK ETS simply becomes a means to increase UK government tax revenues and reduce local authority incomes. Consequently, as access to sequestration options develop, the obligations should increase.</p>
<p>142) Would operators of incineration/EfW plants be exposed to competitiveness impacts abroad and carbon leakage risk, in the event of being exposed to the carbon price? (Y/N) Please explain in as much detail as possible and provide evidence to support your views.</p>	<p>Yes. This issue is not just a case of leakage abroad but also within the UK. Whilst landfill remains an option for household waste outwith Scotland, waste produced in Scotland that should be managed in EfWs may leak to England where landfill is allowable. Leakage is dependent on a combination of EfW costs in the UK and capacity availability and price abroad. Timing introduction of UK ETS for EfW through a coordinated, harmonised approach to match similar measures in likely destinations for RDF/SRF export (largely European countries) would obviate this risk.</p>
<p>143) Have you identified any other distributional impacts (including wider environmental or social impacts) arising from this proposal? (Y/N) Do you have views on how government could address these concerns?</p>	<p>Increasing cost of EfW is likely to have adverse impact on existing District Heating schemes, which currently struggle to compete with the gas market and would likely face an increase in heat supply costs. In addition, UK ETS is likely to degrade the ability of public bodies to invest in new or expanded District Heat schemes. Furthermore, leakage of tonnage abroad (or in Scotland's case to English landfills) could also jeopardise the viability of</p>

	EfW facilities that support District Heat schemes.
144) What additional policies would be needed to support the UK ETS in decarbonising waste incineration and EfW? How would this change over time?	Policies/mechanisms that recognise the value of negative emissions to achieving Net Zero should be introduced as soon as possible in order to assist in closing the financial gap between paying the carbon price and installing carbon capture systems. If leakage is considered a significant issue, the Trans-frontier Shipment of Waste Regulations would also need to be reviewed to dissuade this activity.
145) How would the expansion of the UK ETS to waste incineration and EfW interact with existing and planned policies in waste incineration, EfW, and waste management more broadly, as well as any other relevant non-decarbonisation policies?	Increasing the cost base of EfW either through UK ETS costs or through installation and operation of carbon capture increases the incentive to divert more material from EfW. This is double-edged as it reduces waste input security which is essential to underpin a business case to install carbon capture capacity whilst increasing the ability to spend more on pre-treating waste to capture more recyclables, especially plastics.
146) Are there other parts of the waste management system that should be included in the scope of the UK ETS? For example, landfill or wastewater. (Y/N) Please explain in as much detail as possible and provide evidence to support your views.	Yes. Landfill should be included as it is a significant carbon emitter within the Resource Management sector. It is recognised that to do so would be complex, so an alternative would be to use other regulatory and fiscal tools to minimise the competitiveness of landfill. A UK-wide adoption of the Scottish landfill ban is one option and increases in landfill tax is another.



REPORT TO SUSTAINABILITY COMMITTEE - 15 JUNE 2022

LOCAL HEAT & ENERGY EFFICIENCY STRATEGY (LHEES) DEVELOPMENT UPDATE

1 Executive Summary/Recommendations

1.1 This report contains an update on progress with respect to the Local Heat and Energy Efficiency Strategy (LHEES) being developed for the Aberdeenshire area that Aberdeenshire Council officers have been working on with the support of consultants.

1.1.1 The LHEES will identify what needs to be done to change buildings and local infrastructure over the next 15 to 20 years to fulfil the Scottish Government's objectives and local priorities relating to heat in buildings. Part of the LHEES will include a Delivery Plan which will become an Action Plan to enable a Local Authority and its partners to work towards delivery of the changes required as identified in the LHEES.

1.2 The Committee is recommended to:

1.2.1 Consider and comment on the LHEES Development Update.

2 Decision Making Route

2.1 Consultations in 2017 gathered initial stakeholder views on proposals for Local Authority Level Heat and Energy Efficiency Plans. The Sustainability Committee noted Aberdeenshire Council's response on 30 August 2017 ([item 7](#)). Since then, all 32 Local Authorities have been involved in piloting aspects of the LHEES approach, with Scottish Government funding support. Aberdeenshire Council took part in Phase 2 of these pilots in 2018/2019.

2.2 Aberdeenshire Council was involved in the most recent LHEES Local Authority Resource Call where up to £44,000 grant was awarded for completing Stages 1 to 4 of the recently developed LHEES methodology with consultants 'Changeworks'. This project ended on 31 March 2022, outcomes of which are included at paragraphs 3.5 and 3.6.

2.3 The Draft LHEES Order Consultation was responded to by Aberdeenshire Council on 2 February 2022. On 16 February 2020 ([item 8](#)) the Sustainability Committee acknowledged the response which had been submitted by officers.

3 Discussion

3.1 Through the LHEES, the Scottish Government aims to drive area-based planning and delivery of the heat transition, supporting achievement of statutory emissions reduction targets. The strategies are long-term plans for decarbonising heating in buildings and improving energy efficiency across an

entire Local Authority area and sits at the heart of the Scottish Government's [Heat in Buildings Strategy](#).

- 3.2 The Heat in Buildings Strategy commits to having strategies and accompanying Delivery Plans in place for all Local Authority areas by the end of 2023 and also set out Ministers' intention to put the LHEES on a statutory footing.
- 3.3 It is the intention that the LHEES will form the basis for local public engagement and community involvement in decision making at the local level and support investment planning by the electricity and gas networks.
- 3.4 Following consultation and partnership working with COSLA (Convention of Scottish Local Authorities) and Local Authorities, the [Local Heat and Energy Efficiency Strategies \(Scotland\) Order](#) was laid in the Scottish Parliament on the 11 March 2022. It was then passed on 19 May 2022 and came into force on 21 May 2022.
- 3.5 Aberdeenshire Council engaged Changeworks consultants to develop Stages 1 to 4 of the LHEES for the Aberdeenshire area.

Stage 1 Policy and Strategy Review - sets out the national and local policies relevant to LHEES, providing an opportunity to consider how the national policy landscape can be linked to local drivers. For each priority it sets out indicators and weightings that underpin analysis across the other stages. It enables the mapping of key internal and external stakeholders, as well as funding resources that support Delivery Plan actions.

Stage 2 Data and Tools Library - identifies the most appropriate data and information needed to support analysis in subsequent stages. The library captures data requirements for the priorities, acting as a record of data sets used and capturing associated detail on ownership, data sharing, key contacts etc.

Stage 3 Baseline Strategic Zoning and Pathways - understanding the current energy efficiency and heat decarbonisation performance of the building stock at a local authority wide level. This performance will be based on assessing the building stock against the indicators from Stages 1 - 2.

Stage 4 Generation of initial Delivery Level Areas - uses GIS techniques to generate initial delivery level areas for each of the priorities. Heat Network Zoning uses a linear heat density technique to generate the zones. Other priorities generate the zones using indicators and weightings from Stage 3.

- 3.6 Changeworks completed Stages 1 - 4 of the Strategy while reflecting on lessons learned from previous pilot programs. The Heat Network analysis was limited to those areas where public or semi-public buildings could be used as anchor loads. Anchor loads are high heat demand buildings which would be

key connections for a heat network as they are required to drive the economics of such systems. In the assessment, Changeworks limited selection to those with 2 or more potential anchor load buildings. The process has resulted in the identification of 14 potential Heat Network priority zones which may present opportunities for decarbonisation of heating requirements. These areas will be investigated further in the next stages of the LHEES process.

- 3.7 Further updates on the progress with the LHEES development will be brought back to this committee in due course.

4 Council Priorities, Implications and Risk

- 4.1 This report helps deliver all six of the Council's Strategic Priorities.

Pillar	Priority
Our People	Education Health & Wellbeing
Our Environment	Infrastructure Resilient Communities
Our Economy	Economy & Enterprise Estate Modernisation

- 4.2 The table below shows whether risks and implications apply if the recommendation is agreed.

Subject	Yes	No	N/A
Financial	X		
Staffing	X		
Equalities and Fairer Duty Scotland			X
Children and Young People's Rights and Wellbeing			X
Climate Change and Sustainability			X
Health and Wellbeing			X
Town Centre First			X

- 4.3 There will be staffing and financial implications now that the Order to make LHEES a Statutory Duty has come into force. Scottish Government has consulted on funding levels they plan to make available to Local Authorities for them to carry out the duty, but this is still to be confirmed. The LHEES for Aberdeenshire will potentially require a number of Aberdeenshire Council buildings to be anchor load buildings for multiple Heat Networks as described in paragraph 3.6. In addition, there will be an expectation that as a Local Authority, Aberdeenshire Council will lead the way in reducing carbon impact of its own building stock. Funding for either option has not been identified.
- 4.4 The screening section as part of Stage One of the Integrated Impact Assessment process has not identified the requirement for any further detailed assessments to be undertaken. An Integrated Impact Assessment is not required because this report is to update Councillors on progress made in developing a Local Heat and Energy Efficiency Strategy.

4.5 The following [Corporate Risks](#) have been identified as relevant to this matter on a Corporate Level:

- ACORP001 *Budget pressures* (Our Environment and Our Economy)
Scottish Government have intimated support funding will be available to Local Authorities for development of the LHEES.
- ACORP004 *Business and organisation change* (including ensuring governance structures support change; managing the pace of change)
The funding for development of the LHEES will give additional resource to focus on this statutory duty.
- ACORP005 *Working with other organisations* (e.g. supply chains, outsourcing and partnership working)
Part of the LHEES development includes a delivery plan for which there will be public engagement.
- ACORP010 *Environmental challenges* e.g. extreme weather events, climate change.
Producing and implementing an LHEES is a step towards making changes that will have a positive impact on reducing carbon emissions in the area.

The following Risks have been identified as relevant to this matter on a Strategic Level:

- ISSR004 as it relates to Climate Change in the ([Directorate Risk Registers](#))

5 Scheme of Governance

- 5.1 The Head of Finance and Monitoring Officer within Business Services have been consulted in the preparation of this report and their comments are incorporated within the report and are satisfied that the report complies with the [Scheme of Governance](#) and relevant legislation.
- 5.2 The Sustainability Committee is able to consider (and take a decision on) this item in terms of Section R 1.1a of the [List of Committee Powers in Part 2A](#) of the Scheme of Governance which dictates that this committee approve, review and monitor the Council's work in respect of sustainable development and climate change.

Alan Wood
Director of Environment and Infrastructure Services

Report prepared by Yvonne D'Ambruoso, Sustainable Development Officer
Date: 6 June 2022

REPORT TO SUSTAINABILITY COMMITTEE – 15 JUNE 2022

ENERGY EFFICIENCY PROGRESS IN COUNCIL HOUSES

1 Executive Summary/Recommendations

1.1 This report is to update the Sustainability Committee further to a report to Communities Committee ([Item 10](#)) on 24 March 2022. Communities Committee requested that a report be submitted to the Sustainability Committee detailing the work undertaken by Housing and Building Standards to meet energy efficiency standards and to move towards Net Zero, with said report providing Sustainability Committee with the information to monitor the overall strategic progress of Aberdeenshire Council in becoming a carbon neutral Council, and that this also be reported to the Communities Committee.

1.2 The Committee is recommended to:

1.2.1 Acknowledge the report and consider how the work of Housing & Building Standards sits with the wider work of Aberdeenshire Council in becoming a carbon neutral council.

2 Decision Making Route

2.1 The Scottish Government published the national Climate Change Plan, 2018-2032, the third report on policies and proposals in February 2018. New primary legislation has since been brought forward as a response to the global climate emergency. The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 commenced in March 2020. The legislation sets annual and interim targets for Scotland to reach Net-Zero emissions by 2045, a more ambitious target, and included a commitment to review the Climate Change Plan in light of this. The updated Climate Change Plan was published 16 December 2020, with the next full plan expected to be published in early 2025. The updated Plan sets out an accelerated route to reducing emissions, including the new interim target of 75 per cent reductions by 2030. It also focusses on how this will contribute to a 'green recovery' from COVID-19. The updated Plan includes a full list of policies that have been maintained or made more ambitious and where new policies have been added and there are several implications for the housing sector.

2.1.1 EESSH (Energy Efficiency Standards in Social Housing) was introduced in March 2014 and set a first milestone for social landlords to meet for social rented homes by 31 December 2020.

2.1.2 EESSH2 followed and sets out that all Social Landlord properties must meet and EPC Band B (Energy Efficiency rating), or is as energy efficient as practically possible, by the end of December 2032 and within the limits of cost, technology and necessary consent. It also set a minimum standard that no social housing should be considered for re-let with EPC less than Band D from December 2025.

- 2.2 An informal workshop was held for all Councillors on Monday, 28 February 2022. The workshop focused on the national and legislative responsibilities of the Council in its move towards becoming a Net Zero Council and outlined the actions that the Housing Service is undertaking. The workshop concluded that a paper be referred to Sustainability Committee detailing the move to Net Zero, the changes to our Housing Stock and looking to explore the linkages between the different workstreams under way to become a carbon neutral council. The workshop also requested that a Member Officer Working Group (MOWG) on fuel poverty be considered.
- 2.3 Communities Committee on 24 March 2022 agreed, “That a report be presented to the Sustainability Committee detailing the work undertaken by Housing and Building Standards to meet energy efficiency standards and to move towards Net Zero, with said report providing Sustainability Committee with the information to monitor the overall strategic progress of Aberdeenshire Council in becoming a carbon neutral council, and that this also be reported to the Communities Committee”.

3 Discussion

- 3.1 The Scottish Government has clarified that, ‘We will also work with social landlords to bring forward the review of the existing Energy Efficiency Standard for Social Housing (EESH2) to now conclude in 2023 rather than 2025 with a view to strengthening and realigning the standard with net zero requirements’. This highlights that standards for social housing are being currently a constantly changing target, making long term planning challenging.
- 3.2 The EESH milestones are defined by the Standard Assessment Procedure (SAP) 2012 methodology recorded in Energy Performance Certificates (EPCs). The first EESH milestone set a single minimum Energy Efficiency rating for each home rented by social landlords. The target varied dependent upon the dwelling type and the fuel type used to heat it. In terms of the SAP 2012 methodology the target varied between a rating of 47 (in EPC band E) for an oil heated house, and 69 (in EPC band C) for a gas heated flat.
- 3.3 The EESH was reviewed in 2017-2019. The EESH Review Group included representatives from: Scottish Government; Local Authorities; Registered Social Landlords; Historic Environment Scotland; the Scottish Federation of Housing Associations; the Glasgow and West of Scotland Forum of Housing Associations; the Convention of Scottish Local Authorities; and the Scottish Housing Regulator.
- 3.4 The EESH Review Group considered proposals and agreed new EESH2 milestones as follows:
- 3.4.1 All social housing meets, or can be treated as meeting, EPC **Band B** (Energy Efficiency rating), or is as energy efficient as practically possible, by the end of **December 2032** and within the limits of cost, technology and necessary consent. The 2032 milestone was to have undertaken a formal review in 2025

(now brought forward to 2023 but may even occur in 2022) to assess progress and confirm additional requirements of the 2032 milestone and consider the addition of Air Quality and Environmental Impact.

- 3.4.2 It was further agreed that no social housing is to be re-let below EPC **Band D** from **December 2025**, subject to temporary specified exemptions.
- 3.5 EESSH2 will contribute to the requirements of the Climate Change (Scotland) Act 2019, which sets targets to reduce Scotland's emissions of all greenhouse gases to net-zero by 2045 at the latest, with interim targets for reductions of at least 56% by 2020, 75% by 2030, and 90% by 2040.
- 3.6 The Scottish Government's, Heat in Building Strategy, published in October 2021, advises that:
 - 3.6.1 In order to meet our interim climate targets and ensure long-term delivery of our net zero objectives, **by 2030** the vast majority of the 170,000 off-gas **homes that currently use** high emissions **oil, LPG, and solid fuels**, as well as at least 1 million homes currently using mains gas, **must convert to zero emissions heating**.
 - 3.6.2 To meet the ambition for energy efficiency and zero emissions heat deployment set out above, we **need to quickly ramp up the number of installations of low and zero emissions heating systems** being installed per annum.
- 3.7 As of 31 March 2021, 60% of Aberdeenshire's Council housing stock met the Energy Efficiency Standard for Social Housing (ESSH).
- 3.8 ESSH allows for stock that cannot be brought up to the required standard for technical or social reasons provided these are reviewed regularly. Council properties that cannot be brought up to the standard due to tenant refusals are reviewed annually, and work is carried out at change of tenancy to ensure the property is brought up to the standard.
- 3.9 Due to previous delays with the Housing Improvement Programme (HIP) and technical limitations it had already been identified that Aberdeenshire Council would not be able to achieve ESSH standards for all housing by the deadline of December 2020. In addition, the Covid Pandemic had a significant impact on work to meet ESSH, due to lockdown, restrictions on entering homes for non-essential works, and tenants shielding or self-isolating. Despite this a further 702 properties were brought up to the required energy efficiency standards in 2020/21 increasing ESSH compliance from 55% in 2019-20 to 60% in 2020-21 this is estimated to increase further to 68% in 2021/22.
- 3.10 The Housing Service is working to identify alternative technologies and ways of delivering improvements to ensure that as many properties as possible are brought up to the standard. The Housing service currently anticipates that around 1500 properties will require an exemption from the ESSH standard (mainly on technical grounds), which accounts for around 11% of our housing

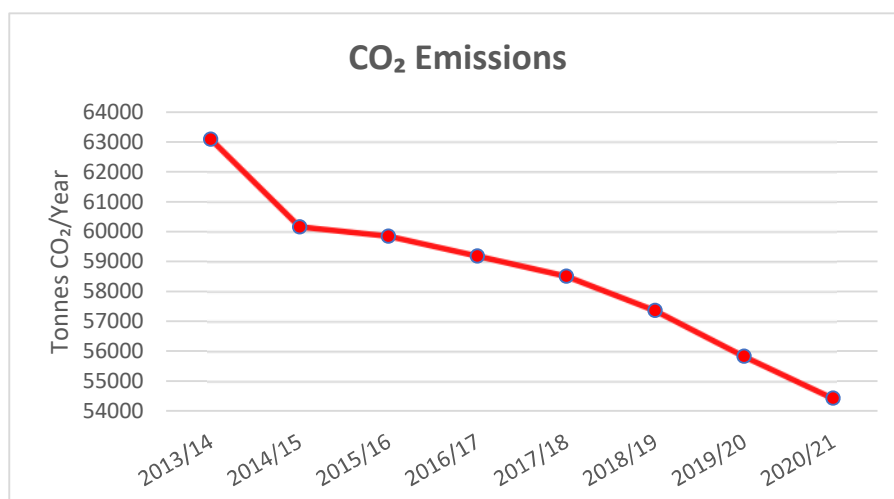
stock. This means that upon completion of the current HIP and EESSH plan, approximately 89% of our stock will comply with EESSH.

- 3.11 Aberdeenshire Council is currently considering its approach to compliance with EESSH2 by both the interim 2025 and 2032 deadlines and the impact of Net Zero.
- 3.12 The Council continues to review EESSH targets in light of EESSH2 and in line with the Scottish Government's guidance on EESSH may reschedule investment to maximise compliance with the 2032 milestone. While the uncertainty caused by the pandemic has delayed this work, Aberdeenshire Council has started work on scoping and planning this work.
- 3.13 Work continues through the Housing Improvement Programme (HIP) and on the backlog of work delayed due to the pandemic. However, further resourcing challenges in terms of materials and labour mean that it is very unlikely that we will meet our original target of 80% compliance by the end of 2021/22. However, work has been incorporated into HIP year 4, to ensure that progress continues to be made and ensures that the houses in Bands G, E & F are improved towards the EESSH2 2025 band D target.
- 3.14 This approach will be for works that are difficult to achieve due to ongoing Covid-19 impacts and are more economically and technically challenging, but which can be demonstrated to be the most cost-effective approach within an overall programme of work to improve the energy efficiency of the landlord's housing stock as part of EESSH2. The Service will also conduct a review to confirm which stock is are viable and sustainable long-term assets. The Housing Service appointed Property Services to undertake an analysis of all the stock to determine the most efficient and effective methods for improving the energy efficiency to meet EESSH2 and ensuring that progress towards Net Zero aspirations for 2040 are not compromised. To this end Property Services appointed consultants to assist in this analysis, Arcadis and Changeworks, who are currently undertaking their research with results anticipated in summer 2022.
- 3.15 During 2021/22, the Housing Improvement Programme (HIP), along with the reactive heating contract and Internal Wall Insulation work at voids, have resulted in multiple properties with improved energy efficiency. These upgrades are shown in the table below:

Component	Total
Cavity Wall Insulation	4
Ext. Doors (Dwelling)	244
Ext. Wall Insulation	48
Heating Boiler (Gas)	393
Heating Boiler (Oil)	15
Heating System (Quantum)	341
Int. Wall Insulation	93
Photovoltaic System	478
Windows	365
Grand Total	1981

3.16 The 1,981 upgrades were carried out in 1,631 properties, some properties had multiple works. These upgrades have contributed to an overall carbon emission saving of 1,410 tonnes of CO₂ per year as illustrated below. For properties where new upgrades have been installed the reduction in CO₂ emissions has been modelled based on data obtained from EPCs.

Year	CO ₂ Tonnes per Year	Average per Property
2013/14	63099	5.061
2014/15	60166	4.696
2015/16	59849	4.658
2016/17	59184	4.599
2017/18	58512	4.506
2018/19	57362	4.434
2019/20	55835	4.300
2020/21	54430	4.171



3.17 There has also been a slight decrease in the overall running costs this year as shown in the table below. This will mainly be down to the new heating systems, insulation and Photovoltaics (PVs) that have been installed.

Year	Running Costs per Year
2013/14	£6,517,591
2014/15	£6,290,185
2015/16	£6,293,801
2016/17	£6,247,229
2017/18	£6,227,570
2018/19	£6,217,802
2019/20	£6,183,265
2020/21	£6,165,260

3.18 The average SAP rating of the stock is now D68. This is based on actual EPC data, (the Council currently has valid EPCs for 99% of its stock, so estimates and modelling are extremely accurate) with some modelled data where new upgrades have been carried out and a new EPC not yet provided.

Year	Average SAP
2009/10	57
2010/11	60
2011/12	61
2012/13	62
2013/14	63
2014/15	64
2015/16	63
2016/17	63
2017/18	63
2018/19	64
2019/20	66
2020/21	68

3.19 The focus for 2022/23 is continuing to work towards the Energy Efficiency Standard for Social Housing (ESSH and ESSH 2). The contracts for ESSH are still ongoing and are focused on Insulation, Heating and Renewables in the continued drive to increase energy efficiency, reduce carbon emissions and eradicate fuel poverty. ESSH 2 contracts are being developed in the same form. The table below shows the remaining planned upgrades for the ESSH contracts.

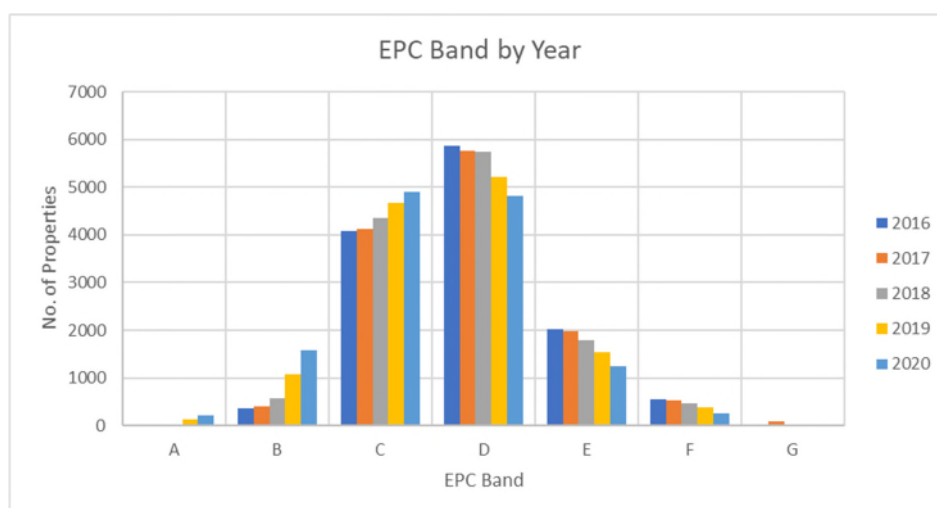
Component	Total
Cavity Wall Insulation	1,815
Ext. Wall Insulation	666
Heating Boiler (Gas)	3,006
Heating System (Quantum)	1,328
Int. Wall Insulation	36
Photovoltaic System	3,528
Grand Total	10,379

3.20 A trial project of Smart Solar Storage using batteries and Smart Technology with PVs is currently being undertaken and if successful could be extended so that many properties, which currently have grid constraints (which is preventing the installation of PVs and Net Zero heating) can benefit. This will also be useful when setting upgrades to meet ESSH 2, due to a potential increase in SAP rating with using batteries and further reductions in CO2 emissions and running costs.

3.21 The table below shows the number of energy efficiency upgrades undertaken through HIP up to the end of year 3, there are also other works undertaken through HIP not energy efficiency related such as Kitchen, Bathroom, communal doors and rewiring which total another almost 6,000 upgrades. Energy Efficiency upgrades are shown below.

Component	Total
Cavity Wall Insulation	193
Ext. Wall Insulation	434
Heating Boiler	3,465
Windows & Doors	4,398
Int. Wall Insulation	36
Photovoltaic System	5,324
Internal Wall Insulation	324
Underfloor Insulation	3
Rooms in the roof	10
Smart Solar Storage Project	500
Grand Total	14,687

3.22 The continued improvements made to the energy efficiency of the housing stock is evident in the EPC figures. This chart shows the number of properties in each EPC band for the 2020/21 financial year and the 4 years prior to that. An increase in bands A, B and C can be seen, whereas the numbers for lower bands D, E, F and G are decreasing.

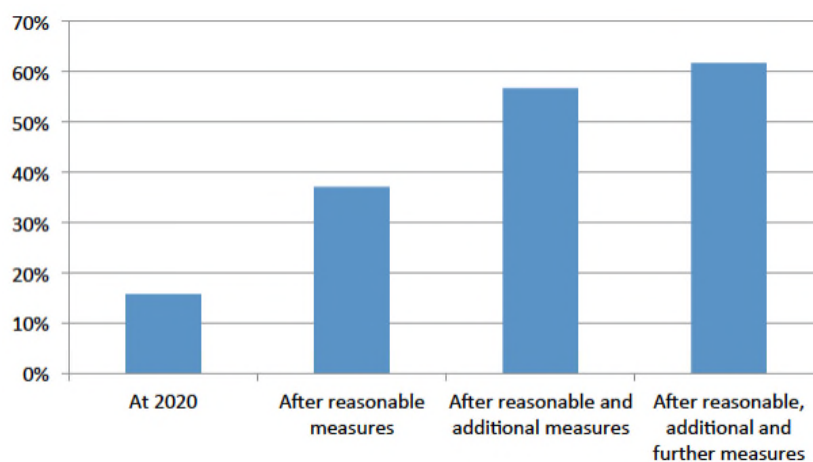


3.23 As mentioned earlier EESSH2 is about to undergo a major review and that this is likely to change the monitoring and targets for landlords, bringing them more in line with Net Zero aspirations The Scottish Housing Regulator (SHR) advised that:

‘the decision to collect data from 1 April 2021 on new indicators for EESSH2 has been overturned, in anticipation of the SG further review of EESSH as a result of the Zero Emissions in Social Housing Taskforce (ZEST) which included a recommendation to bring forward the review of EESSH2 to begin as soon as possible.’

Once details of the information the SHR will be collecting is confirmed this will enable Sustainability Committee to monitor progress towards achieving the EESSH2 2025 and 2032 targets. Once this data collection occurs nationally it will be available to present to Sustainability Committee annually.

3.24 The Scottish Government in its ESSH2 guidance used case studies from a number of landlords to model how many houses could be brought up EPC Band B with existing technology, details of which are shown in appendix 1. The chart below shows the modelled ESSH2 attainment rates anticipated.



3.25 In summary, the Housing Service continues to make good progress towards meeting its energy efficiency commitments as demonstrated in the table below.

	ESSH 2		No. of Properties by SAP Band						
	Pass	Fail	A	B	C	D	E	F	G
Current Position	14%	86%	220	1655	4973	4737	1212	235	14
End of HIP Y3	25%	75%	314	2952	5538	3352	782	103	5
End of HIP Y4	28%	72%	328	3359	5448	3323	537	51	0

3.26 The Housing Service will continue the improvements to its stock through HIP2 which Property Services are currently developing, this contract to run over four years will focus on driving energy efficiency improvements and ensuring that the Aberdeenshire’s Council housing meets the ESSH2 2025 standard by the end of December 2025.

4 Council Priorities, Implications and Risk

4.1 This report relates to the following Council Priorities:

Pillar	Priority
Our People	Education Health & Wellbeing
Our Environment	Resilient Communities
Our Economy	Economy & Enterprise Estate Modernisation

This report helps deliver a number of Strategic Priorities within the undernoted Council Pillars:

4.1.1 Our People

- Promoting tenant well-being by having well designed upgrades, able to adapt and respond to changing occupant requirements and future climate change

4.1.2 Our Environment

- Contributing to providing low carbon homes through the use of renewable technology, innovative insulation solutions and efficient controllable heating
- Providing warm, high quality, affordable homes to meet the Energy Efficient Standards for Social Housing 2 (ESSH2) targets

4.1.3 Our Economy

- Creating sub-contracting opportunities with local Small and Medium Enterprises (SME's)
- Developing the local supply chain by supporting and mentoring SME's and 3rd Sector Organisation
- Providing opportunities for employment to local people

4.1.4 **Other Priorities**

This report helps deliver against these priorities of the Aberdeenshire Local Housing Strategy 2018-2023:

4.1.5 Fuel Poverty, Sustainability and Energy Efficient by:

- Improving the energy efficiency of housing and reducing fuel costs for tenants, contributing to tenant well-being

4.1.6 Independent Living by:

- Provides upgrades that are configured for those with particular needs and providing adaptations to reduce unmet needs, contributing to supporting tenants to live as independently as possible

4.2 The table below shows whether risks and implications apply if the recommendation is agreed.

Subject	Yes	No	N/A
Financial	x		
Staffing	x		
Equalities and Fairer Scotland Duty			x
Children and Young People's Rights and Wellbeing			x
Health and Wellbeing			x
Town Centre First			x
Sustainability			x

4.2.1 There are financial implications contained within this report however they are contained within the current budgets.

- 4.2.2 There is a considerable resource allocated to managing the Housing Improvement Programme commensurate with the scale and ambition of the requirements.
- 4.3 An integrated impact assessment (IIA) was carried out for the Housing Improvement Programme (HIP) and was referenced in the previous Communities Committee Report of 9 December 2021 and is not duplicated here and confirm that no new or revised activity has been introduced since. The assessment detailed the following positive impacts:
- 4.3.1 The Contract will have a positive impact on the Wellbeing Indicators by undertaking multiple upgrades contributing to providing warm, high quality, affordable homes, with provision for adaptations to meet any particular needs of a child or young person, with a disability, respecting their views, to provide an adequate standard of independent living, in the best interest of the child or young person.
- 4.3.2 Children and young people will have opportunities to take part in positive activities such as attending industry awareness days, workplace visits and career events. Young people have been given the opportunity to become economically stable and attain qualifications and experience through apprenticeships, mentoring opportunities and work placements, as available via the four contractors.
- 4.3.3 The Energy Efficient Standard for Social Housing² (ESSH2) sets out the minimum energy efficiency standard for social housing and upgrades being delivered on the Contract include insulation, Photovoltaics, heating, windows and doors all of which contribute towards achieving the ESSH2 target.
- 4.3.4 The Contract undertakes upgrades to improve building fabric to prevent long-term dampness and deterioration. Installation of ventilation is included in many of the upgrades, to minimise condensation, contributing to climate change adaptation.
- 4.3.5 Waste material from the contract is managed by the contractors to ensure minimum materials are transferred to landfill. A measure of the proportion of waste, by weight, that is generated across the contract that is recycled, reused, or otherwise diverted from landfill.
- 4.4 The following Risks have been identified for the Housing Improvement Programme (HIP) as relevant to the matter on a Corporate Level:

Corporate Risks ([Corporate Risk Register](#))

- ACORP001 – Budget Pressures – Although the framework total value is £160m, it is based on the accumulation of four frameworks which are further subdivided into annual Call-off contracts. The contracts allow the Council flexibility around the volume of the goods and or services purchased through the framework and should only place orders for goods and services if there are sufficient funds to do so. Any budget pressure can be accommodated within the yearly Call-off contracts by

adjusting the number of houses and component upgrades to be included.

- ACORP002 – Changes in Government Policy, Legislation and Regulation – Any change can be factored into the yearly Call-off Contracts as per description in ACORP001 above. The Council is also required to adhere to relevant regulations and standards as set out by Scottish Government, including achieving EESSH2 by 2032. The focus for the remaining two years on HIP will be to continue to deliver EESSH2 works.
- ACORP003 – Workforce – Being a four-year framework should minimise the risk and provide contractors with a programme that will enhance workforce provision.
- ACORP005 – Working with other Organisations – the detailed four-year programme of works will reduce risks associated with the supply chain. However, it is largely dependent on the four contractors delivering on contracted works. There are risks associated with this in terms of them being able to deliver the required programme in the required timescales and budget and the supply chain being able to meet the demands, which has and continues to cause challenges on this Contract. Delays in accessing addresses, Scope variations and unexpected challenges being found have caused delays on the Year 1 and Year 2 programme of works. This risk increased significantly with the Covid-19 outbreak; Brexit; ; market recovery, supplier opportunism and the Ukrainian crises have impacted on labour and material availability on the overall programme,
- ACORP006 – Reputation Management – Dedicated and well-informed framework contractors together with the challenging but achievable KPIs will reduce reputational risk. Contractors have ensured continued communication with tenants with respect to Coronavirus and how it has/will impact on their upgrades, keeping their reputation intact.
- ACORP007 – Social Risk – The framework makes provision for detailed Community Benefits that the local community will benefit from. The four framework contractors have signed up to these and are in the process of delivering them with some outstanding results. Although have been delayed in delivering some Community Benefits due to the restrictions with social gatherings previously set by the Scottish and UK Government
- ACORP009 – Operational Risk Management – The framework contract make provision for health and safety requirements associated with works. The contractors have been greatly impacted by the spread of COVID-19 and Brexit and are continually considering their contingency measures to protect their assets and workforce.

- ACORP010 – Environmental Challenges – The framework specification includes mitigation and adaption measures against climate change in the design of upgrades to the fabric of the properties and the inclusion of ventilation measures.

Directorate Risks ([Directorate Risk Registers](#))

- BSSR001 – Balancing the Books – the four-year framework and yearly Call-off contracts will enhance financial management thus reducing the risk to the approved budget.
- BSSR005 – Workforce Fit for the Future – The four-year framework allows the development and retaining of our best employees.

5 Scheme of Governance

- 5.1 The Head of Finance and Monitoring Officer within Business Services have been consulted in the preparation of this report and any comments received have been incorporated within the report. They are satisfied that the report complies with the [Scheme of Governance](#) and relevant legislation.
- 5.2 The Committee is able to review and monitor this item in terms of Section R.1.1a of the [List of Committee Powers in Part 2A](#) of the Scheme of Governance for a decision on any Housing policy issue and resource matter (within agreed budgets).

Alan Wood
Director of Environment and Infrastructure Services

Report prepared by Dave Thomson,
Housing Manager (Asset Management & Repairs)
Date: 3 May 2022

List of Appendices:

Appendix 1 – Within the limits of technology

Appendix 1 - Within the limits of technology

From ESSH2 guidance – November 2020 (Version 2.2)

41. The three categories of measure are as follows. Note that any measure is also subject to considerations of cost-effectiveness.

Reasonable Measures	Additional Measures	Further Measures
Double glazing Secondary glazing Heating controls Storage heaters Loft insulation top up Floor insulation Compact fluorescent lighting External Solid Wall insulation Internal Solid Wall insulation Water heat reclamation Thermostatic Radiator Valves (TRVs) Cavity Wall Insulation Hot water tank and pipe insulation Replace secondary heating Flat roof insulation Room-in-the-roof insulation Switch from storage heaters to electric wet Switch from storage heaters to gas Switch from storage heaters to air source heat pump Switch from storage heaters to quantum storage	Biomass boiler Air source heat pump Ground source heat pump Solar hot water (solar thermal) Solar Photovoltaic (PV) Micro combined heat and power	Insulated doors Additional layers of insulation – e.g. CWI and EWI Triple glazing Flue Gas Heat Recovery Battery storage linked to PVs

42. Landlords should consider what impact alternative measures could make.

43. There should be a process for reviewing any decision that improvement to band B is not technically possible at least once every 5 years.

44. Note that measures involving switching from existing heating system to condensing gas boiler or upgrading existing gas boiler, which were included as reasonable measures for the first milestone of the ESSH, are not included because climate change targets will require decarbonisation of the heat network.

REPORT TO SUSTAINABILITY COMMITTEE - 15 JUNE 2022

ABERDEENSHIRE COUNCIL POLLINATOR ACTION PLAN 2022-2027

1 Executive Summary/Recommendations

1.1 The Environment Team is seeking approval of the Aberdeenshire Council Pollinator Action Plan 2022-2027. The Action Plan is a cross-Service document which identifies the action the Council will take to protect, enhance, and promote pollinator populations in Aberdeenshire.

1.2 The Committee is recommended to:

1.2.1 Approve the Aberdeenshire Council Pollinator Action Plan 2022-2027; and

1.2.2 Instruct the Head of Planning & Economy to report annually on the progress of the Action Plan.

2 Decision-Making Route

2.1 The draft Pollinator Action Plan was discussed at the Planning & Economy Member Officer Working Group on 1 December 2021 and supportive comments were provided. No changes to the Action Plan were requested.

2.2 Comments on the draft Action Plan were sought from all Area Committees in January 2022. Comments received and the steps taken to address them are presented in **Appendix 1**.

3 Discussion

3.1 Aberdeenshire Council was one of the first local authorities in Scotland to produce a Pollinator Action Plan in 2015. This Plan elapsed in 2017 and was subsequently followed by the 2019 to 2021 Action Plan. These action plans set out the work the Council would undertake to protect, promote and enhance pollinator populations. They recognise the need for urgent action.

3.2 Pollinating insects are essential to healthy, functioning ecosystems as they have a key role in the reproduction of many plant species. They are also important to humans - fertilising crops, providing food and pollinating plants in our gardens.

3.3 Pollinator populations have generally been declining over the last 50 years. There are known to be multiple pressures including pesticide use, changes in land use resulting in patchy distribution of natural and semi-natural habitats, and disease. Population impacts linked to climate change are also likely.

3.4 See **Appendix 2** for the draft Action Plan.

- 3.5 In preparation for a new Pollinator Action Plan, the Environment Team carried out a review of the 2019 - 2021 Plan. A Report on the review is provided in **Appendix 3**.
- 3.6 The review found that the majority of actions in the Plan had been completed despite the obvious impact of the coronavirus pandemic. The Action Plan structured and catalysed work to protect and enhance pollinator populations and also provided a means to promote the work of the Council. It was concluded that there was a strong value in having the Action Plan.
- 3.7 The review did note that many of the actions captured were essentially on-going and, while they are very worthwhile to identify, the new Action Plan should also aim to introduce more measurable, time limited actions. This has been addressed in the draft 2022-2027 plan with the introduction of measurable 'Key Priorities'.
- 3.8 The review also indicated that the time period covered by the Action Plan should be extended. It was felt that a longer time period would be beneficial so that the revision/renewal process does not get in the way of action. The new Action Plan has been drafted to match the period remaining on the National Pollinator Action Plan hence running up to 2027. However, a yearly monitoring process will be carried out to ensure the actions are on track, but also remain current and relevant. We will report yearly on Action Plan progress to the Sustainability Committee.
- 3.9 The 2022-2027 Action Plan is a cross Service document with key actions for the Ranger Service, the North East Biological Records Centre (NESBReC), Landscape Services, and Education & Children's Services in addition to the Environment Team. Actions are also identified for the North East Scotland Biodiversity Partnership of which the Council is a partner. As with previous plans, it presents the work of Aberdeenshire Council to protect, enhance, and promote pollinator populations. A number of key priorities are proposed, including:
- At least 10% of public greenspace to be enhanced and managed for pollinators;
 - 80 school grounds to provide habitat for pollinators;
 - A pilot project on the River Don to explore pollinator habitat enhancement;
 - 150 Ranger Service sessions per year with schools, groups, and communities to raise awareness of pollinators;
 - A yearly NESBReC training course on pollinator identification.

4 Council Priorities, Implications and Risk

- 4.1 The proposals in this Report helps to deliver strategic priorities:
- This report helps deliver the Strategic Priority "Resilient Communities" within the Pillar "Our Environment", by addressing the impacts and

mitigating the effects of climate change and improving sustainability through protection and enhancement of natural heritage.

4.2 The table below shows whether risks and implications apply if the Action Plan is agreed.

Subject	Yes	No	N/A
Financial	X		
Staffing		X	
Equalities and Fairer Duty Scotland	IIA attached as Appendix 4		
Children and Young People's Rights and Wellbeing	IIA attached as Appendix 4		
Climate Change and Sustainability	IIA attached as Appendix 4		
Health and Wellbeing	IIA attached as Appendix 4		
Town Centre First		IIA attached as Appendix 4	

4.3 There are financial implications resulting from agreement to progress a number of the actions in the Plan. For example, changes to the management of public greenspace will have cost implications. However, the Action Plan captures on-going work to both cost and implement changes across Aberdeenshire with the aim of an overall reduction in costs over time. All other projects in the Action Plan have been costed and are considered deliverable based on current budgets. No staffing implications are predicted.

4.4 An Integrated Impact Assessment has been carried out as part of the development of the proposals set out above. It is included as **Appendix 4**. No negative impacts were identified. There are positive impacts in the following areas:

- 'Children's Rights and Wellbeing', 'Equalities and Fairer Scotland Duty' and 'Health Inequalities' through the provision of high quality, attractive, interesting, biodiverse greenspaces which provide places for communities and people of all ages to be active and learn and thus promote physical and mental health
- 'Sustainability and Climate Change' by protecting and enhancement pollinator habitat and populations thus improving the quality of the environment, reducing carbon emissions from grass cutting activities and planting trees which will sequester carbon.

4.5 No Risks have been identified as relevant to this matter on a Corporate Level.

4.6 The following Risks have been identified as relevant to this matter on a Strategic Level:

- Directly contributes to mitigation of Infrastructure Services Risk 005 'Open spaces that encourage active, healthy lifestyles' by identifying and focusing measures to aid delivery of the Greenspaces project to increase biodiversity across the public owned spaces in Aberdeenshire.
- Directly contributes to the mitigation of Infrastructure Services Risk 007 'Safeguard the built and natural environment' by focusing, structuring, and monitoring delivery of a range of work which will benefit public greenspace, pollinators, biodiversity, and & the natural environment.

5 Scheme of Governance

- 5.1 The Head of Finance and Monitoring Officer within Business Services have been consulted in the preparation of this report and their comments are incorporated within the report. They are satisfied that the report complies with the Scheme of Governance and relevant legislation.
- 5.2 The Committee is able to consider this item in terms of Section S.1.1a of the List of Committee Powers in Part 2A of the Scheme of Governance as the request is to approve, review the Council's work in respect of an aspect of sustainable development.

Alan Wood
Director of Environment and Infrastructure Services

Report prepared by James Davidson, Environment Planner
Date: 19 April 2022

List of Appendices:

- Appendix 1 - Area Committee Comments on draft Aberdeenshire Council Pollinator Action Plan 2022-2027
Appendix 2 - Aberdeenshire Council Pollinator Action Plan 2022-2027
Appendix 3 - Review of Aberdeenshire Council Pollinator Action Plan 2019-2021
Appendix 4 - Integrated Impact Assessment

**Appendix 1 - Area Committee Comments on draft Aberdeenshire Council
Pollinator Action Plan 2022-2027**

Buchan 11/01/22		
Reference	Comment	Response/action
BAC1	Where wild flowers are to be used on road verges, that careful consideration be given to the type so as to ensure they are low growing to allow motorists full view of sightlines at junctions, including junctions into fields.	Noted and agreed. Council verge management contracts will be reviewed in 2025 and safety will take priority when considering management options for pollinators. No change to the Action Plan required.
BAC2	Where we have wide verges that are sub-contracted for cutting, these should be prioritised when considering which road verges should be planted with wild flowers.	As BAC1
BAC3	The planting of wild flowers as opposed to grass cutting is not well understood by all members of the public, and therefore there is an important role for the Greenspace Officers in terms of getting the message across and engaging more with the public to help them understand.	Noted and agreed. Action Plan highlights the importance of the Greenspace Officers as well as the crucial role of education, consultation, and engagement. No change to action plan required.
BAC4	To highlight the importance of consultation with local communities where any of the proposals involves local greenspace, i.e., local Members, Community Councils, local organisations etc.	As BAC3
BAC5	Whilst understanding there may be sensitivities to the planting of wild flowers at greenspaces in cemeteries, to note support for this proposal, in particular at new cemeteries or extensions at cemeteries, and that this should be encouraged albeit slowly and with careful consideration and consultation and only where appropriate to do so.	Noted and agreed. Greenspace Officers and Landscape Services actively consider options for modifying cemetery management to benefit pollinators where possible and appropriate. No change to the Action Plan required.
BAC6	In relation to para 1.4 of the Draft Plan which reads “population impacts linked to climate change are also suggested”, to highlight the importance of choosing plants which will provide bloom throughout the full year and therefore attract insects and pollinators spanning the full year.	Noted and agreed. Choosing plants which cover the full flowering season is crucial for pollinators. The action plan and associated guidance (i.e., 5 steps for pollinator leaflet) promote this. No change to the Action Plan required.

Garioch 11/01/22		
Reference	Comment	Response/action
GAC1	Commend ambition in Action Plan.	Noted. No change to the Action Plan required.
GAC2	Opportunity to create small habitats in the areas where trees were brought down by Storm Arwen.	Noted and agreed. Environment Team and Landscape Services currently considering options for replanting/habitat creation in the Council's storm hit woodlands. No change to the Action Plan required.
GAC3	Welcome change of focus towards River Don.	Noted. No change to action plan required.
GAC4	Welcome positive communication and engagement with communities to ensure projects are appropriate.	Noted and agreed. Action Plan highlights the importance of education, consultation, and engagement. No change to the Action Plan required.

Kincardine and Mearns 18/01/22		
Reference	Comment	Response/action
KMAC1	In order to enhance public open spaces and help maintain public spaces, consideration to be given to planters, raised beds and tubs as options when planting out these open spaces.	Noted. All practical, sustainable options to enhance public greenspace will be considered. Planters and tubs could have a place but would necessarily be a small-scale option and thus are unlikely to achieve the ambitions of the plan alone. No change to the Action Plan required.
KMAC2	Some members opposed the 10% of public greenspaces to be enhanced and managed for pollinators however others were in agreement but suggested the need for close engagement with the community through social media inviting comments and not only with established groups but sharing ideas wider within the community.	Both opposition and support noted. Overall, the feedback from the 6 Area Committees has been overwhelmingly positive for the Action Plan and its targets. The message that education, consultation and engagement are required has been consistently made by Members. The Action Plan recognises and reinforces the crucial importance of this. No change to the Action Plan required.
KMAC3	Members queried the decision-making route and sought further clarification if comments went to Sustainability Committee or indeed whether this should be Infrastructure Services Committee.	Legal & People, in Business Services, have identified that approval should be sought from Sustainability Committee based on S1.1a in the List of Committee Powers. No change to the Action Plan required.

Formartine 18/01/22		
Reference	Comment	Response/action
FAC1	Updates on Gordon Park and Auchterellon wild meadows and proposal to establish a route to new community campus Ellon to be provided via Ward Pages.	Greenspace Officer asked to respond to Member directly on this issue. No change to the Action Plan required.
FAC2	Local initiatives to be reported to Area Committee and incorporated into the Area Plan.	Action Plan amended with the process in italics below. Aim is keep reporting process simple. Combining Action Plan reporting with the existing biodiversity reporting will streamline but also mean all Members will see detail of Council biodiversity action beyond the Pollinator Action Plan alone. <i>Action plan monitoring will be reported yearly to Sustainability Committee via a bulletin. The bulletin will combine action plan reporting and the annual biodiversity reporting. The bulletin will include details of works/projects for each Area Committee area and will be made available to all Members via Ward pages.</i>

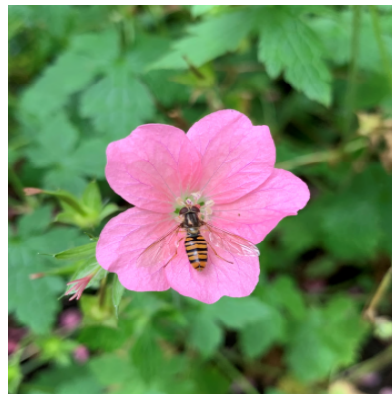
Banff and Buchan 25/01/22		
Reference	Comment	Response/action
BBAC1	Full consultation should take place with communities to identify the most suitable areas.	Noted and agreed. Action plan highlights the importance of education, consultation, and engagement. No change to the Action Plan required.
BBAC2	Education is necessary to provide the skills required to manage re-wilding as it takes a degree of expertise, and ongoing maintenance to sustain the projects.	Noted and agreed. Training has been provided by external and internal experts to Council staff and to community groups. Online resources have also been produced and more are planned. No change to the Action Plan required.
BBAC3	There is a need for co-ordination and the work of all groups should be coordinated through the Greenspace Officer.	Noted and agreed. Greenspace Officers are a key point of contact and coordination as the action plan highlights. No change to the Action Plan required.

Marr 25/01/22		
Reference	Comment	Response/action
MAC1	Emphasised the importance of pollinators and would like to see more explanation of their importance included within the Plan.	Agreed. Further detail of the importance of pollinators added to paragraph 1.2 of the Action Plan.
MAC2	Supported the emphasis on planting perennials as opposed to annual bedding plants.	Noted. No change to the Action Plan required.
MAC3	Requested further information in relation to road verge seeding at Tullich Kirkyard.	Noted. Greenspace Officer asked to get back to Member directly. No change to the Action Plan required.
MAC4	Noted that the Greenspace Officers could be contacted with proposals for community planting projects.	No change to the Action Plan required.
MAC5	Highlighted the need for promotion and action to deliver the Plan, which would require comprehensive engagement with communities and schools. Effective communication would be essential when making any changes to explain what was happening and why. Demonstration projects would help to show how initiatives could work.	Noted and agreed. Action Plan highlights the importance of education, consultation, and engagement. Action plan includes collation and promotion of demonstration sites (Key Priority 1.1). No change to the Action Plan required.
MAC6	In relation to Key Priority 1.1, to suggest that the action be 'measures for pollinators introduced in at least 80 school grounds'.	Agreed. Action Plan changed as suggested.
MAC7	Highlighted the need for consultation with residents, and to address concerns about maintenance of town centres and management of public greenspaces which many would prefer to be neatly maintained.	Noted and agreed. Action Plan highlights the importance of education, consultation, and engagement. No change to the Action Plan required.
MAC8	In relation to road verge management, safety and visibility at junctions and drainage/flood risk should also be taken into account.	Noted and agreed. Council verge management contracts will be reviewed in 2025 and safety will take priority when considering management options for pollinators. No change to the Action Plan required.
MAC9	Welcomed the decision to extend the timescale of the Plan.	Noted. No change to the Action Plan required.

Appendix 2 - Aberdeenshire Council Pollinator Action Plan 2022-2027

1. Introduction

- 1.1. This is Aberdeenshire Council's third Pollinator Action Plan, with past plans running from 2015 to 2017 and 2019 to 2021. This and previous plans recognise the need for urgent action to protect and enhance pollinator populations. This Action Plan is a cross Service document that identifies key areas of Council work up to March 2027 in alignment with The Pollinator Strategy for Scotland which runs until 2027 also.
- 1.2. Pollinating insects are essential to healthy, functioning ecosystems as they have a key role in the reproduction of many plant species. Without them, the landscapes and habitats of Aberdeenshire would be very different with the knock-on effects of their loss meaning biodiversity would be greatly reduced. They are also hugely important to humans by fertilising a number key crops as well as providing honey and pollinating plants in our gardens.
- 1.3. The main insect pollinators are bees. While honeybees are the best known, there are many other bee species, including a wide range of bumblebees and solitary bees that contribute significant pollinating services to crops and natural plant communities. Other groups of insects such as flies, wasps, beetles, moths, and butterflies also include important pollinators.
- 1.4. Pollinator populations have generally been declining over the last 50 years. There are known to be multiple pressures including pesticide use, changes in land use resulting in patchy distribution of natural and semi-natural habitats, and disease. Population impacts linked to climate change are also highly likely.
- 1.5. Different types of pollinating insect have different requirements, but in order to survive and flourish, they generally require well connected sources of pollen and nectar throughout the flowering season together with suitable sites for breeding or nesting to enable development of early life cycle stages and shelter throughout the year, including for winter hibernation.
- 1.6. Providing good habitats for pollinators will also help to support a wide range of other invertebrates as well as seed and insect eating birds and small mammals for example.



2. Policy

- 2.1. All public bodies in Scotland have a duty to further the conservation of biodiversity as defined in the Nature Conservation (Scotland) Act 2004.
- 2.2. The [Pollinator Strategy for Scotland 2017-2027](#) aims to address the causes of decline in populations, diversity and range of Scottish pollinator species, and to help them thrive in future. Objectives include making Scotland more pollinator friendly by preventing further loss of flower rich habitat, creating new areas of suitable habitat and enhancing connectivity between them, raising awareness and encouraging action across all sectors.
- 2.3. Aberdeenshire Council's Strategic Priorities identify the need to protect our valuable natural resources.

3. Taking Action

- 3.1. Aberdeenshire Council will take action across Services to meet 4 key objectives:
 - Objective 1:** Create habitat for pollinators
 - Objective 2:** Contribute to the monitoring of pollinator populations
 - Objective 3:** Help raise awareness of the importance of pollinators
 - Objective 4:** Protect existing habitat for pollinators
- 3.2. There are two types of action identified under each Objective. First our Key Priorities which are the focus for effort driven by the Action Plan. Second are our Ongoing Commitments, the work Council Teams and Services continue to progress day-to day which benefits pollinator populations.
- 3.3. The document has been produced by the Environment Team within Planning & Economy with input from other teams and Services including the Ranger Service, NESBReC, Landscape Services, Property & Facilities Management and Education & Children's Services. For each year of the strategy, we will carry out monitoring of actions and planning for the coming 12 months to assess and focus progress.
- 3.4. Notes on the Action Plan acronyms:
 - NESBReC is the North East Scotland Biological Records Centre
 - NESBiP is the North East Scotland Biodiversity Partnership
- 3.5. **Objective 1:** Create habitat for pollinators
We have lost around 97% of ancient wildflower meadows in the UK over the last 80 years. Where wildflower meadows do still exist, they are often small and isolated from each other, making it difficult for populations of insect pollinators to colonise new areas. Larger areas and better connectivity of suitable wild or cultivated habitat is needed. Council owned and managed land presents an opportunity to improve habitat for pollinators. In addition, we can influence others through our Development Management policies and process for example.

Key Priorities

Key Priority	Detail	Lead	Deadline
1.1 Implement habitat enhancement for pollinators on Council owned/managed land	<ul style="list-style-type: none"> At least 10% of Council managed public greenspace to be enhanced and managed for pollinators & biodiversity 	Greenspace Officers	March 2027
	<ul style="list-style-type: none"> Maximise opportunities for pollinator habitat at Corporate Offices as part of maintenance review 	Property and Facilities	March 2023
	<ul style="list-style-type: none"> Measures for pollinators introduced in at least 80 school grounds 	Education	March 2027
	Modify road verge management policy and process to further benefit pollinator populations	Landscape Services	March 2025
	Explore habitat creation at Council owned woodland sites – shrub planting in open rides or woodland edge for example	Environment Team	March 2024
	Share information and experience from works to date/demonstration sites both within Aberdeenshire and from other areas	NESBiP	March 2023
1.2 Use and supply pollinator friendly plants	Supply community groups with native wildflower seed to trial on 100 to 200m ² areas	NESBiP	When requested
	Explore opportunities for Council plant nursery facilities to produce alternatives to annual bedding – perennial plants, wildflowers or native trees for example	Landscape Services	March 2024
	Develop guidance on native plant seed collection and propagation	NESBiP, Environment Team	April 2022
1.3 Use Buglife identified 'B-lines' as a catalyst for habitat creation in Aberdeenshire	Run River Don B-lines delivery mechanism project with Buglife. Use findings/outputs to shape further work.	Environment Team	April 2022

Ongoing Commitments

Action	Detail	Lead
Managing existing pollinator habitat on Council owned/managed land	Manage existing habitat: <ul style="list-style-type: none"> in public greenspace at offices including Woodhill House and Gordon House other sites including paths and road verges 	Landscape Services Landscape Services & Environment Team Landscape Services & Environment Team
	Provide online courses and toolbox talks to Council staff and elected members to raise awareness of pollinators and pollinator friendly management practices	Ranger Service
	Continue to reduce annual bedding on Council owned/managed land – replace with native pollinator friendly seed mixes and/or perennials	Landscape Services
Development Management enhances pollinator habitat	Ensure developments provide and enhance habitats for pollinating insects through complying with Local Development Plan policies on biodiversity enhancement, landscaping (including landscaping maintenance) and watercourse buffer strips	Development Management and Environment Team
Minimise herbicide use	Herbicides only to be used where absolutely necessary in managing vegetation encroachment in graveyards, roads and footpaths and for controlling invasive non-native plant species	Landscape Services
Community and land manager advice and support	Provide support and guidance to community groups and land managers seeking to improve their local sites for pollinators	Ranger Service, NESBiP and Environment Team

3.6. **Objective 2:** Help raise awareness of the importance of pollinators

Pollinating insects have a higher profile with the general public than a few years ago. There is a fairly broad awareness that they are threatened and that they are valuable. However, it is a message that does need to be reinforced and often what can be lacking is clear actions that the public can take to help. Aberdeenshire Council will aim to raise public awareness in the ways identified below.

Key Priorities

Key Priority	Target	Lead	Deadline
2.1 Aberdeenshire Council Ranger Service to raise awareness of pollinators	150 Ranger Service sessions per year with schools, groups and communities to raise awareness of pollinators	Ranger Service	Annual monitoring

Ongoing Commitments

Ongoing Commitment	Detail	Lead
Make available materials which promote pollinating insects	Pollinator identification leaflet and '5 steps for pollinators' leaflet available on website and in printed form	Environment Team
	Butterflies of NE Scotland leaflet produced by Butterfly Conservation in conjunction with Ranger Service & NESBReC available on Butterfly Conservation website and printed copies	Ranger Service
	Promote biodiversity education pack for schools and provide teaching staff training on the pollinator activities	Ranger Service
Aberdeenshire Council pollinator champions	Continue working with Councillor pollinator champions to promote and protect pollinators	Environment Team
Use social media to raise awareness of pollinators	Use Aberdeenshire Greenspace, Ranger Service and NESBReC social media to promote pollinating insects	Greenspace Officers, NESBReC and Ranger Service
Respond to relevant national consultations on pollinators	Respond to relevant national consultations on pollinators and pollinator habitat ensuring the situation in Aberdeenshire is well represented	Environment Team
Work with partners and communities to protect and promote pollinators	Work with partners, including neighbouring local authorities and the North East Scotland Biodiversity Partnership, to promote and protect pollinators	Environment Team
	Provide advice to communities, where asked, regarding pollinators	Ranger Service and Environment Team
	Work with Area Managers teams on getting advice and information on pollinators and greenspace to communities	Area Managers, Greenspace Officers and Environment Team

3.7. **Objective 3:** Contribute to the monitoring of pollinator populations

Pollinators are a highly diverse group of insects that are subject to variable levels of recording and monitoring. Many are difficult to identify without some specialist knowledge, however others, like butterflies and moths, have successful national recording schemes. NESBReC is the local biological records centre and welcomes & encourages recording of pollinating insects. Monitoring provides a base line measure for assessing the impacts of our actions to improve habitats for pollinators

Key Priorities

Key Priority	Detail	Lead	Deadline
3.1 Increase pollinator monitoring and identification skills in the community and encourage participation in monitoring	Run at least one NESBReC training course per year which focusses on volunteer recording of certain pollinating insects.	NESBReC	At least one training course per year
	Highlight pollinators at annual Recorders Forum	NESBReC	Every year at annual recorders forum

Ongoing commitments

Action	Detail	Lead
Process and manage records of pollinating species from local recorders	NESBReC to identify pollinating species from submitted photographs and to manage and process any records of pollinators received from local recorders by inputting into the NESBReC database	NESBReC
Input into national recording schemes and citizen science surveys for pollinating species	Promote (through sessions and social media) and provide support and guidance for volunteers and community groups on national recording schemes for butterflies and moths and citizen science surveys for pollinators	NESBReC, NESBiP and Ranger Service
	Take part in national recording schemes for butterflies and moths and citizen science surveys for pollinators	Ranger Service
	Provide local records to national recording schemes	NESBReC

3.8. **Objective 4:** Protect existing habitat for pollinators

Many of Aberdeenshire’s richest wildflower grasslands have been identified as sites of national or local importance for biodiversity. These sites are protected through policies in the Aberdeenshire Local Development Plan. The local development plan also contains policies to protect areas rich in biodiversity within the wider countryside from inappropriate development and identifies green networks within major settlements. Continued habitat survey will assist with identifying areas of existing species rich grassland.

Ongoing commitments

Action	Detail	Lead
Survey for wildflower rich grassland sites and other pollinator habitat	NESBReC to continue habitat surveys in Aberdeenshire to identify valuable grassland sites and other valuable pollinator habitats	NESBReC
Protect valuable pollinator habitat in the development management process	Ensure development complies with Local Development Plan policies on natural heritage/biodiversity protection	Development Management and Environment Team
	Where undesignated wildflower rich grassland or other key pollinator habitat is identified (through NESBReC survey work or the development management process for example) consider designating these areas as a Local Nature Conservation Site	Environment Team
Protect pollinator habitat from inappropriate afforestation	Consider impacts on pollinator habitat when responding to forestry planting consultations from Scottish Forestry	Environment Team

4. Monitoring and Reporting

4.1. This draft Action Plan covers the period 2022 to 2027. The document has been produced by the Environment Team within Planning & Economy with input from other teams and Services including the Ranger Service, NESBReC, Landscape Services, Property & Facilities and Education & Children’s Services. The actions cross a number of teams and services. The Environment Team will have oversight of the plan and monitor achievement of the actions yearly, including assessing the need to review the strategy prior to 2027.

4.2. Action plan monitoring will be reported yearly to Sustainability Committee via a bulletin. The bulletin will include details of works/projects for each Area Committee area and will be made available to all Members via Ward pages.

Appendix 3 - Review of Aberdeenshire Council Pollinator Action Plan 2019-2021

1. Introduction

- 1.1. The Aberdeenshire Council Pollinator Action Plan 2019 to 2021 identified the work that Aberdeenshire Council would undertake to address the decline of pollinating insects. The Action Plan outlined the work the Council would take on the land it owns and manages, as well as how it would work with and influence others. The Action Plan period ended in March 2021 and progress against the actions is detailed below. The review will assist in preparation of the next Action Plan.
- 1.2. The Action Plan can be found at this link:
<https://www.aberdeenshire.gov.uk/media/24875/aberdeenshirecouncilpollinatoractionplan2019to2021.pdf>
- 1.3. Pollinating insects are essential to healthy, functioning ecosystems as they have a key role in the reproduction of many plant species. They are also important to humans - fertilising crops, providing food, and also pollinating plants in our gardens. The available data continues to strongly indicate that pollinating insects are declining across the world – including in Scotland.
- 1.4. The Action Plan identifies the opportunities for Aberdeenshire Council to play its part in addressing this decline. The Environment Team within Planning and Environment took the lead role in developing, implementing, and monitoring the Action Plan. The actions identified were delivered by a number of Teams and Services in addition to the Environment Team, in particular Landscape Services, the Ranger Service, and NESBReC.

2. The Review

- 2.1. The Action Plan was structured around the 5 Objectives detailed below.
 - Objective 1:** Help raise awareness of the importance of pollinators in food production and in ecosystems
 - Objective 2:** Contribute to the monitoring and recording of pollinator populations
 - Objective 3:** Reduce Aberdeenshire Council's use of pesticides and other chemicals for pest and weed control that may have an effect on pollinator populations
 - Objective 4:** Create habitat for pollinators, including improving habitat connectivity
 - Objective 5:** Protect existing areas of wildflower rich grassland
- 2.2. Each of the 5 Objectives was further broken down to the series of actions with nominated leads and deadlines identified. Progress in achieving these actions is reviewed below with a red/amber/green assessment provided of action progress.

2.3. **Objective 1:** Help raise awareness of the importance of pollinators in food production and in ecosystems

There was a wide range of pollinator awareness raising through the strategy period lead by the Ranger Service, NESBReC and the on-going Greenspace project (a project which is looking to modify the Council’s management of public greenspace to benefit nature and communities). The impacts of the coronavirus pandemic were certainly felt with face-to-face events with schools and communities being cancelled. This resulted in increased use of social media as a promotional tool, with notable successes including Grassland Watch which was created during the lockdown restrictions when the cessation of Council grass-cutting greatly increased community engagement on greenspace management. In general, pollinator awareness has grown greatly in the public consciousness in recent years with people very aware of the declines and threats. Moving forwards, communication needs to continue its focus on practical action. Despite the impact of the pandemic, all actions are reviewed as green with coronavirus adaptations successfully made where required.

Table 1: Objective 1 review detail

Action	Detail	Lead	Deadline	Review
1.1 Raise awareness of pollinators through Aberdeenshire Council Ranger Service and NESBReC events.	<p>1.1.1 The Ranger Service run a range of events throughout the year, many of which include awareness raising in relation to pollinating insects</p> <p>1.1.2 Add information on pollinators to Ranger’s summer events programme</p>	<p>Ranger Service</p> <p>Ranger Service</p>	<p>Yearly events programme</p> <p>March 2020</p>	<p>Yearly Rangers events programme was severely impacted by covid during strategy period and only one on the ground pollinator event was able to take place. However, strong awareness raising through social media including video on pollinators, encouraging recording of wildflower species in areas of reduced management and interactive online Question and Answer session on Wildlife Gardening and encouraging pollinators to gardens. National recording schemes for pollinators also promoted.</p>

	1.1.3 NESBReC to highlight pollinators at their events	NESBReC	Ongoing	Nesbrec held two recorders' forums in the period both of which covered topics of relevant to pollinating insects. In 2019 NESBReC held one course on the identification of Hoverflies and another on the identification of coastal plants. NESBReC recording training events impacted by covid in 2020 but grassland watch, national recording schemes and pollinating insect awareness generally strongly promoted through social media. One notable occurrence over the last couple of years that NESBReC has highlighted has been the arrival of Tree bumblebee in the area.
1.2 Work with schools to raise children's awareness of pollinators	1.2.1 Ranger Service to raise awareness of pollinators when working with schools	Ranger Service	Ongoing	School events impacted by covid during strategy period but Rangers will continue to raise awareness of pollinating insects in their work with schools.
	1.2.2 Greenspace Officers to work with schools to create pollinator habitat in school grounds or local area	Greenspace officers	September 2020	A number of schools are engaged with Greenspace Officers in modifying their grounds to benefit biodiversity including pollinators. Work on-going with Newtonhill and Banff primary schools being seen as an excellent example.

1.3	Seek opportunities to use Council facilities such as visitor centres and libraries to raise awareness of the importance of pollinating species	1.3.1	We have 2 pollinator banners - circulate one banner around libraries in Aberdeenshire	Libraries Centre, Oldmeldrum	Ongoing	Banner remains with library service for future use - libraries close for much of the strategy period.
		1.3.2	Use second banner at relevant events – it is on display at the Bennachie Centre but can be used elsewhere	Ranger Service, Environment Team	Ongoing	Banner remains for use at Bennachie Centre.
1.4	Create materials which promote pollinating insects	1.4.1	Create an appropriate sign to identify Council sites which are being managed for pollinators	Greenspace Officers	December 2019	Sign created and used in Greenspace project.
		1.4.2	Produce materials which identify good garden plants for pollinators suitable to growing conditions in north east Scotland	Environment Team	March 2020	Previous leaflet refreshed and re-printed. Used in Greenspace project and elsewhere.
1.5	Aberdeenshire Council pollinator champions	1.5.1	Aberdeenshire Council to have two Councillor pollinator champions	Environment Team	Ongoing	Engagement with the two pollinator champions on-going. A refresh of the process in 2021 is increasing engagement. Links with tree planting, Swifts, and hedgehog champions also made.
1.6	Seek opportunities for positive press and social media coverage	1.6.1	Use Aberdeenshire Council Leader-funded Greenspaces project as an opportunity to promote pollinating insects through press and social media	Greenspace Officers	September 2020	Pollinators promoted in materials, signage, social media, and directly by Greenspace Officers throughout the Greenspace project.

	for planting and management for pollinators	1.6.2 Use Rangers and NESBReC social media to promote pollinating insects	Ranger Service	Ongoing	Both NESBReC and Ranger social media used to raise awareness and promote recording of pollinating insects - increased use of social media as a result of covid.
1.7	Respond to relevant national consultations on pollinators	1.7.1 Respond to relevant national consultations on pollinators and pollinator habitat ensuring the situation in Aberdeenshire is well represented	Environment Team	As required	Environment Team continue to feed in progress on our pollinator action plan to NatureScot when they review the national pollinator action plan where requested. A key process in the period was the Buglife B-lines project where key routes for enhancing pollinator habitat were identified nationally - we fed into this process for Aberdeenshire identifying the larger river corridors and the coast as our B-lines.
1.8	Work with partners and communities to protect and promote pollinators	1.8.1 Work with partners, including neighbouring local authorities and the North East Scotland Biodiversity Partnership, to promote and protect pollinators	Environment Team	Ongoing	Environment Team continue to work with partners, including the local biodiversity partnership who have strongly supported the Greenspace project.
		1.8.2 Provide advice to communities, where asked, regarding pollinators	Ranger Service and Environment Team	Ongoing	Responded to requests where they have come through - much of the contact has been directed to the Greenspace Officers.

2.4. **Objective 2:** Contribute to the monitoring and recording of pollinator populations

Recording of local pollinator populations continues – primarily by members of the public (citizen science) strongly supported by NESBReC and the Ranger Service. The Marr Area Ranger was nominated for a national recording award for contributions in recording butterflies and moths in particular. The aim to derive local pollinator status information has been hampered by lack of data, particularly the regular monitoring over long time periods, hence the need to continue to promote and support recording.

Action	Detail	Lead	Deadline	Review
2.1 Run identification courses for pollinator species	2.1.1 Run at least one NESBReC training course per year which focusses on pollinating insects	NESBReC	At least one training course per year	NESBReC held two recorders' forums in the period both of which covered topics of relevant to pollinating insects. In 2019 NESBReC held one course on the identification of Hoverflies and another on the identification of coastal plants. NESBReC recording training events impacted by covid in 2020 but Grassland watch, national recording schemes, and pollinating insect awareness generally strongly promoted through social media. One notable over the last couple of years that NESBReC has highlighted has been the arrival of Tree bumblebee in the area.
2.2 Promote and distribute Aberdeenshire Council	2.2.1 Reprint pollinator identification leaflet	Environment Team	November 2019	Leaflet reprinted and made available to for use.
	2.2.2 Put pollinator identification leaflet on website	Environment Team	November 2019	PDF placed on website.

pollinator identification leaflet	2.2.3	Promote and distribute pollinator identification leaflet	Environment Team, NESBReC and Ranger Service	Ongoing	Leaflet made available for use. Used by Greenspace Officers in particular during strategy period. Limited use by Ranger Service due only to the restrictions on face-to-face sessions and the closure of outlets.
2.3 Process and manage records of pollinating species from local recorders	2.3.1	NESBReC to identify pollinating species from submitted photographs and to manage and process any records of pollinators received from local recorders by inputting into the NESBReC database	NESBReC	Ongoing	Core job of NESBReC – ongoing.
2.4 Input into national recording schemes for pollinating species	2.4.1	Promote (through events and social media) national recording schemes for butterflies and moths	NESBReC and Rangers Service	Ongoing	National recording schemes promoted through both Ranger and NESBReC social media. Marr Area Ranger nominated for National recording award.
	2.4.2	Take part in national recording schemes for butterflies and moths	Ranger Service	Ongoing	Ranger team continue to contribute to national monitoring scheme for butterflies and moths.
	2.4.3	Provide local records to national recording schemes	NESBReC	Ongoing	Records provided by NESBReC
2.5 Provide information on the status of pollinating insects in Aberdeenshire	2.5.1	Investigate whether local status information can be derived from national monitoring scheme data (e.g. butterflies)	NESBReC	April 2020	Investigated. Not enough records from Aberdeenshire area in any of the recording schemes to derive local status information. Recording levels need to be increased - continue to promote and contribute.

2.5. **Objective 3:** Reduce Aberdeenshire Council's use of pesticides and other chemicals for pest and weed control that may have an effect on pollinator populations

The use of a number of pesticides has now been banned due to their detrimental effect on the environment (particularly pollinating insects) or human health, but there remains a general concern over the levels and range of chemicals used. Aberdeenshire Council's use of pesticides is in compliance with relevant regulations and code of practice. Aberdeenshire Council's Landscape Services have reduced chemical use by around 40% over the past 10 years and will continue to investigate opportunities to further reduce its use. Reduction continued through the Action Plan period with the pandemic in particular allowing for a real time 'test' of the impacts on maintenance of there being no spraying. The use of Glyphosate continues in certain applications, but the Greenspace project aims to trial alternatives going forwards. As further work is required here, this action is assessed as amber.

Action	Detail	Lead	Deadline	Review
3.1 Continue to reduce the use of chemicals in weed and insect control	3.1.1 Identify where it is appropriate and cost effective to reduce the use of chemicals in weed and insect control	Landscape Services	September 2020	Landscape Services continue to minimise their use of biocides. Generally, spraying was greatly reduced during the pandemic allowing for a 'test' of the impact of no use on maintenance. Glyphosate is still used, particularly on footpaths and graveyards. Further consideration of usage suggested for next Pollinator Action Plan.
	3.1.2 Identify and trial alternatives to chemical plant and weed control	Landscape Services and Environment Team (Invasive Non-native species project)	September 2020	Minimising usage has been the successful focus to date rather than exploring alternatives. However, the Greenspace project aim to trial alternatives.

2.6. **Objective 4:** Create habitat for pollinators, including improving habitat connectivity.

Existing meadows at Aberdeenshire Council properties are now valuable pollinator habitats although the pandemic impacted on annual maintenance in 2020. As sites at Gordon House and Kincardine O'Neil were not maintained in 2020, these actions are assessed as amber – maintenance needs to be re-started in 2021. Maintenance reduction at Woodhill House during the pandemic did highlight options for significant and ambitious biodiversity enhancement here with planting and reduced grass cutting to be implemented in 2021 and going forwards. It is hoped this can be a catalyst for other sites – further liaison is required, hence the amber status.

The Leader-funded Greenspace project concluded. Although the public engagement element of the project was impacted by the pandemic, work on identifying sites for reduced maintenance was completed and the value of the work and the need to engage meant the project was rolled over with 2 Greenspace officers in post for 2021. Planting of pollinator-friendly perennials and the sowing of amenity wildflower seed mixes is becoming the default position for flowerbeds previously planted with annual bedding.

Work on stalled development sites proved to be difficult to progress, with no uptake from developers and issues with the single Council site trialled. Action elsewhere is likely to yield more benefits.

Action	Detail	Lead	Deadline	Review
4.1 Create demonstration sites on Council owned/managed land	4.1.1 Maintain meadow at Aberdeenshire Council's Gordon House and explore options to expand the area	Landscape Services and Environment Team	Ongoing	Meadow now excellent wildflower and pollinator habitat. However, covid prevented the annual cut in 2020. Maintenance likely to resume in 2021.
	4.1.2 Maintain meadow at Aberdeenshire Council's Woodhill House and explore options to enlarge area	Landscape Services	Ongoing	Woodhill house ground left entirely uncut for much of 2020. Results have inspired an ambitious programme of habitat enhancement on site with Greenspace Officers, Environment Team, Landscape Services, and Property contributing to plan of reduced grass cutting and native planting in 2021.
	4.1.3 Explore options for meadows and existing and new Aberdeenshire Council premises	Landscape Services and Environment Team	Ongoing	Further identification of opportunities required - hopefully changes at Woodhill House can be a catalyst. Liaise further with Property.
	4.1.4 Maintain Deeside Way meadow at Kincardine O'Neil	Landscape Services and Environment Team	Ongoing	Meadow now excellent wildflower and pollinator habitat. However, covid prevented the annual cut in 2020. Maintenance likely to resume in 2021.

4.2 Complete Leader funded Greenspace Project	4.2.1 Identify Council owned/managed greenspace sites to trial reduced maintenance and environmental enhancement	Greenspace Officers	October 2019	Opportunities for reduced maintenance, tree planting, and wildflower meadows successfully identified across Council greenspace. A number of trial areas and fully implemented changes made as a result of project.
	4.2.2 Engage with the public and Council staff on reduced greenspace management and chosen sites	Greenspace Officers	March 2020	Local communities and Councillors engaged on proposals to date. Public events impacted by pandemic. However, a method of direct engagement - lettering homes adjacent to proposed reduced maintenance is to be trialed.
	4.2.3 Implement reduced maintenance	Greenspace Officers	April 2020	Implementation of reduced maintenance on-going in 2021 after covid related delays in 2020.
	4.2.4 Write up project summary and lessons learned including identification of reduced maintenance engagement and implementation process	Greenspace Officers	September 2020	Final reports of Leader-funded greenspace project completed. The value of the project and some delays due to covid mean the project has been extended using internal resources with two officers employed for 2021.
4.3 Review the production and use of annual bedding plants	4.3.1 Review the use and supply of annual bedding plants in the Council to see if pollen and nectar rich perennial plants (or some other pollinator beneficial planting type) would be a suitable alternative	Landscape Services/ Greenspace Officers	September 2020	Offering of perennial plants to communities being trialed in 2021. Use of bedding plants directly by the Council being greatly reduced with wildflower planting being put in place in a number of places.

	4.3.2	Identify if Council plant nursery facilities can produce alternatives to annual bedding – perennial plants, wildflowers or native trees for example	Landscape Services/Green Space Officers	September 2020	Use of nursery facilities still under review with trial of perennial plant supply being carried out in 2021. Facilities geared up to the supply of annual bedding so any changes would require investment.	
4.4	Stalled development sites - seek opportunities to sow wildflower mixes on sites with planning permission that are not likely to be developed for some time	4.4.1	Explore opportunities to sow temporary wildflower seed mix at stalled development sites in Aberdeenshire Council ownership former – for example at Ellon Academy site	Environment Team/Planning Information and Delivery Team	April 2020	Initial requests sent to a number of developers but no opportunities arose. Planting done on Council owned site in Alford in 2019 but was impacted by very dry summer. Enquiries and progress halted during covid - need to re-evaluate for next strategy.
4.5	Development Management enhances pollinator habitat	4.5.1	Ensure developments provide and enhance habitats for pollinating insects through complying with Local Development Plan policies on biodiversity enhancement, landscaping (including landscaping maintenance) and watercourse buffer strips	Development Management and Environment Team	Ongoing	Local Development Plan policies applied. 2021 Local Development Plan will include policies on biodiversity enhancement as well as protection of important habitats.
4.6	Aberdeenshire Council infrastructure projects provide	4.6.1	Work with relevant services (e.g. Roads or Property) to promote the inclusion of pollinator habitat in new infrastructure projects	Environment Team	Ongoing	Environment Team liaison with Property on-going. It is now essentially default that new school projects in particular will see opportunities for habitat.

pollinators habitat				enhancement. No new road project during the strategy but confidence that enhancement measures would be built in here also.
4.7 Review Council roadside verge management to see if benefits to pollinators can be increased	4.7.1 Carry out a review of roadside verge management policies and procedures to see if benefits to pollinators can be increased. Issues to explore include the timings of cuts, liaison with contractors and the use of yellow rattle	Landscape Services	September 2020	Road verge maintenance policy was reviewed during strategy period. However, habitat benefitting measures were largely carried over due to various constraints. Waiting to see if post-covid budgetary issues mean a fresh opportunity to engage.
	4.7.2 Survey road verges near Pitmedden that have previously been planted with Yellow rattle	Environment Team	August 2020	Site visit opportunities limited in 2020 - one visit made and some Yellow rattle remains. Need further in-season assessment to see if supplementary seeding required.

2.7. **Objective 5:** Protect existing areas of wildflower rich grassland.

Nesbrec habitat surveying was paused as a result of covid but will continue with an increased programme in 2021. For both Planning and forestry application, the Environment Team continue to promote protection of valuable pollinator habitat. New Local Nature Conservation Sites will be confirmed through the adoption of the 2021 Local Development Plan.

Action	Detail	Lead	Deadline	Review
5.1 Survey for wildflower rich grassland sites and other pollinator habitat	5.1.1 NESBReC to continue habitat surveys in Aberdeenshire so as to identify valuable grassland sites and other valuable pollinator habitats	NESBReC	Surveys carried out yearly in summer months	Habitat surveying took place in 2019. Paused in 2020 due to covid but will resume in summer 2021.
5.2 Protect valuable pollinator habitat in the development management process	5.2.1 Ensure development complies with Local Development Plan policies on natural heritage/biodiversity protection	Development Management and Environment Team	Ongoing	Environment Team continue to input to planning application to assist policy compliance and to seek enhancement.
	5.2.2 Where undesignated wildflower rich grassland or other key pollinator habitat is identified (though NESBReC survey work or the development management process for example) consider designating these areas as a Local Nature Conservation Site	Environment Team	Ongoing	A number of new Local Nature Conservation Site are proposed in the 2021 Local Development plan which include a range a natural and semi-natural habitat of benefit to pollinators. These will be confirmed with the adoption of the LDP.
5.3 Protect pollinator habitat from inappropriate afforestation	5.3.1 Consider impacts on pollinator habitat when responding to forestry planting consultations from Scottish Forestry	Environment Team	Ongoing	Environment Team continue to respond to forestry planting consultations - valuable grassland habitat highlighted in relevant applications

3. Concluding comments and next steps

- 3.1. The Aberdeenshire Council Pollinator Action plan 2019-2021 has structured and catalysed work to protect and enhance pollinator populations and also provided a means to promote the extensive and successful work of the Council. Undoubtedly the coronavirus pandemic impacted on some of the actions – reducing face-to-face public engagement and limiting site maintenance for example. However, it also presented opportunities such as the public became strongly engaged on the management of greenspace and the increased audience reach of social media messages on pollinators.
- 3.2. The majority of the actions of the strategy have been achieved. It is felt that the structured approach provided by the 5 overall objectives was appropriate and helpful.
- 3.3. A number of the actions captured in the strategy are essentially on-going. It is beneficial to identify these as they are key in achieving its aims. It is felt that highlighting the time-limited actions more fully in the future strategies would be helpful. Indeed, integrating more actions with specific targets would be beneficial overall.
- 3.4. Consideration should be given to the period of time covered in a new strategy. It is felt that a longer time period would be beneficial so that the revision/ renewal process does not get in the way of action. The time period will be driven by the necessary action to an extent, but having a three-year strategy, with regular monitoring, and possibly a yearly review process, is suggested as an initial model.
- 3.5. There is certainly strong value in having a pollinator strategy and thus the Environment Team will now begin the process of creating a new Strategy with the input of other Services and Councillors.

Aberdeenshire Council

Integrated Impact Assessment

Aberdeenshire Council Pollinator Action Plan 2022-2027

Assessment ID	IIA-000510
Lead Author	James Davidson
Additional Authors	Craig Stewart
Service Reviewers	David MacLennan
Subject Matter Experts	Susan Forbes, Claudia Cowie, Jane Wilkinson, Christine McLennan
Approved By	Paul Macari
Approved On	Monday April 11, 2022
Publication Date	Monday April 11, 2022

1. Overview

This document has been generated from information entered into the Integrated Impact Assessment system.

IIA of Sustainability Committee report seeking approval of the Aberdeenshire Council Pollinator Action Plan 2022-2027

During screening 6 of 10 questions indicated that detailed assessments were required, the screening questions and their answers are listed in the next section. This led to 4 out of 5 detailed impact assessments being completed. The assessments required are:

- Childrens' Rights and Wellbeing
- Equalities and Fairer Scotland Duty
- Health Inequalities
- Sustainability and Climate Change

In total there are 9 positive impacts as part of this activity. There are 0 negative impacts, all impacts have been mitigated.

A detailed action plan with 1 points has been provided.

This assessment has been approved by paul.macari2@aberdeenshire.gov.uk.

The remainder of this document sets out the details of all completed impact assessments.

2. Screening

Could your activity / proposal / policy cause an impact in one (or more) of the identified town centres?	No
Would this activity / proposal / policy have consequences for the health and wellbeing of the population in the affected communities?	Yes
Does the activity / proposal / policy have the potential to affect greenhouse gas emissions (CO2e) in the Council or community and / or the procurement, use or disposal of physical resources?	Yes
Does the activity / proposal / policy have the potential to affect the resilience to extreme weather events and/or a changing climate of Aberdeenshire Council or community?	No
Does the activity / proposal / policy have the potential to affect the environment, wildlife or biodiversity?	Yes
Does the activity / proposal / policy have an impact on people and / or groups with protected characteristics?	No
Is this activity / proposal / policy of strategic importance for the council?	Yes
Does this activity / proposal / policy reduce inequality of outcome?	No
Does this activity / proposal / policy have an impact on children / young people's rights?	Yes
Does this activity / proposal / policy have an impact on children / young people's wellbeing?	Yes

3. Impact Assessments

Children's Rights and Wellbeing	No Negative Impacts Identified
Climate Change and Sustainability	No Negative Impacts Identified
Equalities and Fairer Scotland Duty	No Negative Impacts Identified
Health Inequalities	No Negative Impacts Identified
Town Centre's First	Not Required

4. Childrens' Rights and Wellbeing Impact Assessment

4.1. Wellbeing Indicators

Indicator	Positive	Neutral	Negative	Unknown
Safe		Yes		
Healthy	Yes			
Achieving		Yes		
Nurtured		Yes		
Active	Yes			
Respected		Yes		
Responsible		Yes		
Included		Yes		

4.2. Rights Indicators

UNCRC Indicators upheld by this activity / proposal / policy	Article 24 - Health and health services Article 31 - Leisure, play and culture
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4.3. Positive Impacts

Impact Area	Impact
Active	High quality, attractive, interesting biodiverse greenspaces provide places for children to to be active and thus promote health
Healthy	High quality, attractive, interesting biodiverse greenspaces provide places for children to to be active and thus promote health

4.4. Evidence

Type	Source	It says?	It Means?
Other Evidence	Extensive external material and studies	Significant evidence on the benefits of high quality, attractive, biodiverse greenspaces on mental and physical health	Significant evidence on the benefits of high quality, attractive, biodiverse greenspaces on mental and physical health

4.5. Accounting for the Views of Children and Young People

No specific survey/involvement but there is a strong awareness of the benefits of high quality, biodiverse public greenspaces on children's health and well-being.

4.6. Promoting the Wellbeing of Children and Young People

Help to provide attractive, biodiverse greenspaces for public use.

4.7. Upholding Children and Young People's Rights

Help to provide attractive, biodiverse greenspaces for public use.

4.8. Overall Outcome

No Negative Impacts Identified.

Positive impact of improving public greenspace on health and activity of young people

5. Equalities and Fairer Scotland Duty Impact Assessment

5.1. Protected Groups

Indicator	Positive	Neutral	Negative	Unknown
Age (Younger)	Yes			
Age (Older)	Yes			
Disability		Yes		
Race		Yes		
Religion or Belief		Yes		
Sex		Yes		
Pregnancy and Maternity		Yes		
Sexual Orientation		Yes		
Gender Reassignment		Yes		
Marriage or Civil Partnership		Yes		

5.2. Socio-economic Groups

Indicator	Positive	Neutral	Negative	Unknown
Low income		Yes		
Low wealth		Yes		
Material deprivation		Yes		
Area deprivation		Yes		
Socioeconomic background		Yes		

5.3. Positive Impacts

Impact Area	Impact
Age (Older)	Accessible and diverse public greenspaces benefit health and wellbeing
Age (Younger)	Provide attractive, natural, biodiverse greenspaces to encourage activity, learning and health in young people
Age (Younger)	Accessible, diverse public greenspaces benefit health and well-being

5.4. Evidence

Type	Source	It says?	It Means?
Other Evidence	External data and studies	Extensive evidence and data on the health benefits of high quality, attractive, biodiverse public greenspaces.	Extensive evidence and data on the health benefits of high quality, attractive, biodiverse public greenspaces.

Type	Source	It says?	It Means?
External Data	NatureScot e.g. https://www.nature.scot/sites/default/files/2019-10/Guidance%20-%20health%20benefits%20from%20green%20exercise.pdf	NatureScot has extensive information and evidence on the clear health benefits of visiting the outdoors. This includes primary research and public survey. Example link of a policy statement provided.	There are clear health and well-being benefits from visiting the outdoors

5.5. Engagement with affected groups

No specific engagement/surveys but general knowledge of the benefits of high quality public greenspaces

5.6. Ensuring engagement with protected groups

No specific engagement/surveys but general knowledge of the benefits of high quality public greenspaces

5.7. Evidence of engagement

No specific engagement/surveys but general knowledge of the benefits of high quality public greenspaces

5.8. Overall Outcome

No Negative Impacts Identified.

Positive impacts on health and activity of young people resulting from improvements in public greenspace

5.9. Improving Relations

Not applicable

5.10. Opportunities of Equality

The engagement activities are broad, promotional materials and events are free. All can attend. Habitat enhancement works will take place in public open space and are accessible to all.

6. Health Inequalities Impact Assessment

6.1. Health Behaviours

Indicator	Positive	Neutral	Negative	Unknown
Healthy eating		Yes		
Exercise and physical activity		Yes		
Substance use – tobacco		Yes		
Substance use – alcohol		Yes		
Substance use – drugs		Yes		
Mental health	Yes			

6.2. Positive Impacts

Impact Area	Impact
Mental health	Attractive, natural greenspaces and access to nature are proven to improve mental health. Enhancing for pollinators will improve attractiveness and improve access to nature for communities.

6.3. Evidence

Type	Source	It says?	It Means?
External Data	NatureScot - https://www.nature.scot/guidance-health-benefits-green-exercise	Evidence of the benefits or exercise and access to attractive, nature-rich greenspace	Shows the benefits or exercise and access to attractive, nature-rich greenspace

6.4. Overall Outcome

No Negative Impacts Identified.

Action Plan will improve public greenspace and access to nature. No negative health impacts from the plan identified.

7. Sustainability and Climate Change Impact Assessment

7.1. Emissions and Resources

Indicator	Positive	Neutral	Negative	Unknown
Consumption of energy	Yes			
Energy efficiency		Yes		
Energy source		Yes		
Low carbon transition		Yes		
Consumption of physical resources		Yes		
Waste and circularity		Yes		
Circular economy transition		Yes		
Economic and social transition		Yes		

7.2. Biodiversity and Resilience

Indicator	Positive	Neutral	Negative	Unknown
Quality of environment	Yes			
Quantity of environment		Yes		
Wildlife and biodiversity	Yes			
Infrastructure resilience		Yes		
Council resilience		Yes		
Community resilience		Yes		
Adaptation		Yes		

7.3. Positive Impacts

Impact Area	Impact
Quality of environment	Action plan commits to protecting and enhancement pollinator habitat and populations thus improving the quality of the environment
Wildlife and biodiversity	Action plan includes commitments to protect and enhance habitat and pollinator populations
Consumption of energy	Action Plan identifies reduced intensive maintenance of at least 10% of public greenspace this reducing emissions form grass cutting activities for example. Alternative measures such as tree planting will actually sequester carbon.

7.4. Evidence

Type	Source	It says?	It Means?
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Type	Source	It says?	It Means?
Other Evidence	General knowledge/evidence	Reducing intensive management of greenspace using petrol/diesel powered machinery will reduce emissions. Tree planting and other habitat measures can sequester carbon.	Reducing intensive management of greenspace using petrol/diesel powered machinery will reduce emissions. Tree planting and other habitat measures can sequester carbon.
External Data	Extensive external data on habitat protection and enhancement	Shows how the protection and enhancement of habitat for pollinators can benefit not only pollinator populations but biodiversity generally.	Shows how the protection and enhancement of habitat for pollinators can benefit not only pollinator populations but biodiversity generally.

7.5. Overall Outcome

No Negative Impacts Identified.

Action plan outlines a number of measures which reduce emissions and protect and improvement environment as a core focus. No negative impacts as a result.

8. Action Plan

Planned Action	Details
<p>Production, yearly monitoring and reporting of progress with Aberdeenshire Council Pollinator Action Plan 2022-2027. Final review at end of strategy period with reporting to Sustainability Committee.</p>	<p>Lead Officer James Davidson</p> <p>Repeating Activity No</p> <p>Planned Start Friday April 01, 2022</p> <p>Planned Finish Wednesday March 31, 2027</p> <p>Expected Outcome Action plan monitored yearly. Actions delivered and reported on. Pollinators and communities benefit from the work.</p> <p>Resource Implications Some cost implications to proposed work. All activities proposed are within current work plans or are costed as deliverable. No staffing implications.</p>



REPORT TO SUSTAINABILITY COMMITTEE – 15 JUNE 2022

STREET LIGHTING LED UPGRADE PROGRAMME - UPDATE

1 Executive Summary/Recommendations

1.1 This report advises the Committee on progress in implementing the street lighting LED upgrade programme. It provides information on units upgraded, energy reduction, and carbon reduction. Figures are also presented on the cumulative costs and savings arising from the programme to date. A significant milestone has been reached in that the total capital expenditure on the programme has now been matched by savings in electricity costs which will continue to increase in the future.

1.2 The Committee is recommended to:

1.2.1 **Acknowledge the progress that has been made in the Street Lighting LED Upgrade Programme to date;**

1.2.2 **Endorse the completion of the programme to cover the remainder of the Council's street lighting stock; and**

1.2.3 **Note that the process applied effectively to street lighting can produce a substantial carbon reduction and a good financial rate of return.**

2 Decision Making Route

2.1 On 29 November 2012 Infrastructure Services Committee considered a report on options to reduce energy consumption from street lighting and approved a policy for Aberdeenshire Council. This included the following:

- A long-term programme to upgrade the Council's street lighting stock to the most economic units meeting nationally recommended minimum lighting levels, whenever new or replacement lanterns are installed.

2.2 At that time, LED lanterns were not the most economic option owing to their high cost. However, by 2015 the situation had changed and a programme to upgrade the Council's street lighting stock to LED units was started. Councillors were updated on progress with Briefing Notes made available through the Ward Pages, most recently in April 2019. The programme has now reached a significant milestone, and so it is felt appropriate to report formally on this to the Sustainability Committee.

3 Discussion

- 3.1 Our highest street lighting energy consumption was in 2013-14 with 18,539,894 kilowatt-hours. Prior to the commencement of the LED replacement programme, some other energy saving measures were implemented and the consumption in 2014-15 was down to 18,312,528 kwh. The energy cost in that year was £1,995,398 and 9,834 tonnes of carbon were emitted. These figures have been used as a base against which the impact of the LED energy reduction programme has been evaluated.
- 3.2 The timing and phasing of the LED energy reduction programme were critical in obtaining the best return for the Council. When consideration was first given to the project in 2012, LED lanterns cost upwards of £500 each and a full replacement programme would have cost around £30 million. The technology was in a phase of rapid development with prices falling and efficiency improving year on year. The annual reduction in price was roughly double the potential annual saving at this stage, so early implementation would have come at a high price. The Service decided to start the programme when the price reached about £200 per lantern and to phase it over 5 years to benefit from further price reductions on the prediction that it would fall further to a stable rate of around £100 per lantern. The Service concentrated on straightforward sites where it would be easy to make a saving in the early years and saved the sites where savings would be more difficult to achieve, for instance those with heritage lanterns, for the later years when we could benefit from the lower prices and higher efficiencies. To maximise the benefits, the Service designed each scheme from first principles to achieve the minimum recommended lighting levels rather than simply swapping to a unit giving the same light output as that being replaced. This meant that we exceeded our initially predicted savings, as more locations had previously been over-lit than under-lit.
- 3.3 The price threshold for starting the programme was reached in 2015, so it commenced in 2015-16. It was planned as a 5-year programme to upgrade all our streetlights to LED costing a total of £6 million and saving 50% on our energy consumption. The programme has had a few setbacks, notably when work had to stop during Covid 19 restrictions and subsequently with worldwide shortages of various key components. However, the Service is getting back on course and now anticipate completion in 2023-24.
- 3.4 By 2021-22 the Service had spent a total of £4,724,596 on LED upgrades and 72.05% of our lanterns were LED units. The Council's annual energy consumption had reduced by 45.96% to 9,856,296 kwh, the cost had fallen by 17.87% to £1,636,860 and carbon emissions by 76.3% to 2,331 tonnes. Over this period, the unit cost of electricity had increased by 51.98% and the carbon emissions per unit of electricity had reduced by 56.27%. Bar charts showing the change in energy consumption and carbon emissions since 2013 are provided in **Appendix 1**.

- 3.5 Electricity cost savings have been calculated by comparing the actual cost for each year with that which would have been incurred had the energy consumption remained at its 2014-15 level. The cumulative savings by the end of 2021-22 on this basis amount to £4,705,665. These savings continue so by the date of this meeting the Council will have more than recovered its cumulative investment of £4,724,596. Having passed this break-even point, the savings will continue to mount up and in a year's time the Service anticipates that the savings will have exceeded the expenditure by over £1 million.
- 3.6 The estimate of the benefits above are very conservative as since 2014-15, the total number of streetlights has increased by 7.62% from 43,516 to 46,831. This has arisen partly from the adoption of street lighting in new developments and partly from the new roads transferred to the Council when the AWPR and Balmedie to Tipperty schemes were opened. This will have increased the Council's energy consumption, so an alternative calculation of savings has been done based on the number of lamps remaining at its 2014-15 level. On this basis, the cumulative savings by the end of 2021-22 would amount to £5,211,751, well ahead of cumulative expenditure.
- 3.7 Electricity prices are currently rising fast. This will further enhance the value to the Council of the energy savings arising from the Street Lighting LED upgrade programme.
- 3.8 The programme is continuing and there is a lag between installing the new lights and updating our inventory. The Service estimates that on work completed around 76% of our network is now upgraded to LED. The Council's inventory is being updated to reflect this. The Service has scheduled the upgrading of the remaining lights over the next two years and anticipate completion by the end of 2023-24. The Service does not recommend any acceleration of the work at this stage. World supply problems continue and having saved the most difficult sites to last, the design resources will be fully occupied in meeting this timetable.
- 3.9 The Service now has a well-established and effective process for designing and implementing LED upgrades to external lighting system. On completion of the programme to upgrade the street lighting stock, it may be worth extending the process to other external lighting within the service.

4 Council Priorities, Implications and Risk

- 4.1 This report helps deliver the Strategic Priority "Infrastructure" within the Pillar "Our Environment" by minimising the impact of our street lighting infrastructure on the key principle of "climate and sustainability" and delivering the key principle of "responsible finances" by phasing the programme to give the maximum financial benefit to the Council.

4.2 The Street Lighting LED upgrade programme will help the Council to achieve its carbon reduction target by cutting energy consumption to less than half its previous level.

4.3 The table below shows whether risks and implications apply if the recommendations are agreed.

Subject	Yes	No	N/A
Financial	X		
Staffing		X	
Equalities and Fairer Duty Scotland	X [IIA attached as Appendix 2]		
Children and Young People's Rights and Wellbeing		X	
Climate Change and Sustainability	X [IIA attached as Appendix 2]		
Health and Wellbeing	X [IIA attached as Appendix 2]		
Town Centre First	X [IIA attached as Appendix 2]		

4.4 The financial implication will be to protect the Council from what would otherwise have been a very substantial rise in annual electricity costs. In 2021-22 the energy cost for street lighting would have been around £1.4 million greater had the LED upgrades to date not been completed. The programme has a further two years to run and electricity prices are still rising so the financial benefits to the Council will continue to grow.

4.5 An integrated impact assessment has been carried out as part of the development of the proposals set out above. It is included as **Appendix 2**. The main impact is a net benefit to Climate Change and Sustainability arising from a substantial reduction in carbon emissions. There are more marginal net positive impacts on Equalities and Fairer Duty, Health and Wellbeing and Town Centre First.

4.6 The following Risks have been identified as relevant to this matter on a Corporate Level:

- ACORP001 Budget Pressures: The Street Lighting LED Upgrade Programme will help to mitigate the risk of budget pressures arising from rising electricity prices

- ACORP010 Environmental Challenges: The Street Lighting LED Upgrade programme will help to mitigate the risk of climate change by reducing CO2 emissions.
- [Link to risk register page on website](#)

5 Scheme of Governance

- 5.1 The Head of Finance and Monitoring Officer within Business Services have been consulted in the preparation of this report and their comments are incorporated within the report and are satisfied that the report complies with the Scheme of Governance and relevant legislation.
- 5.2 The Committee is able to consider this item in terms of Section R.1.1 of the List of Committee Powers in Part 2A of the Scheme of Governance as it relates to the approval, review and monitoring of the Council's work in respect of sustainable development and climate change in order to ensure compliance with relevant statutory duties, with particular reference to the Climate Change Action Plan.

Alan Wood
Director of Environment & Infrastructure Services

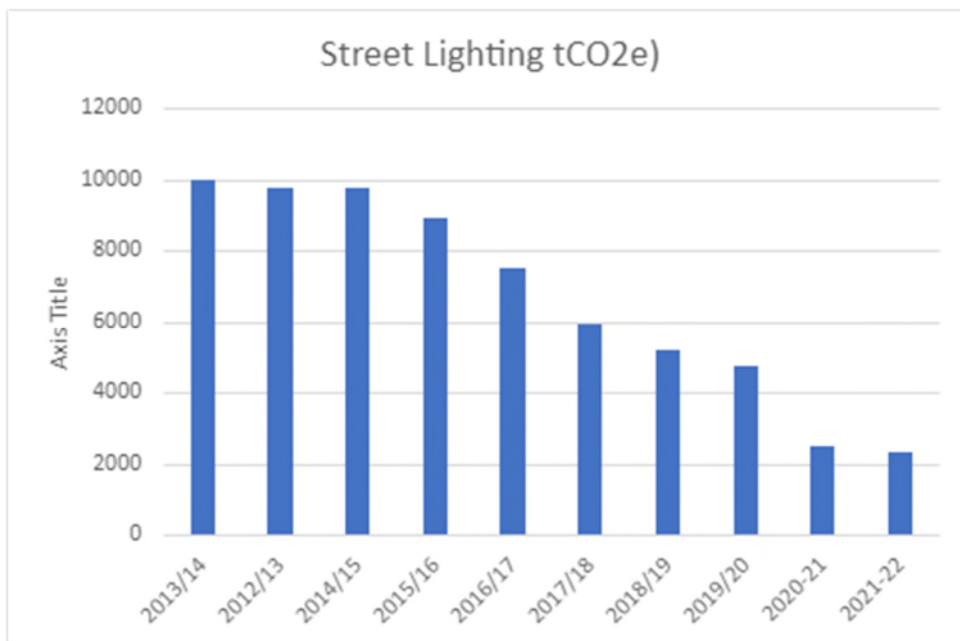
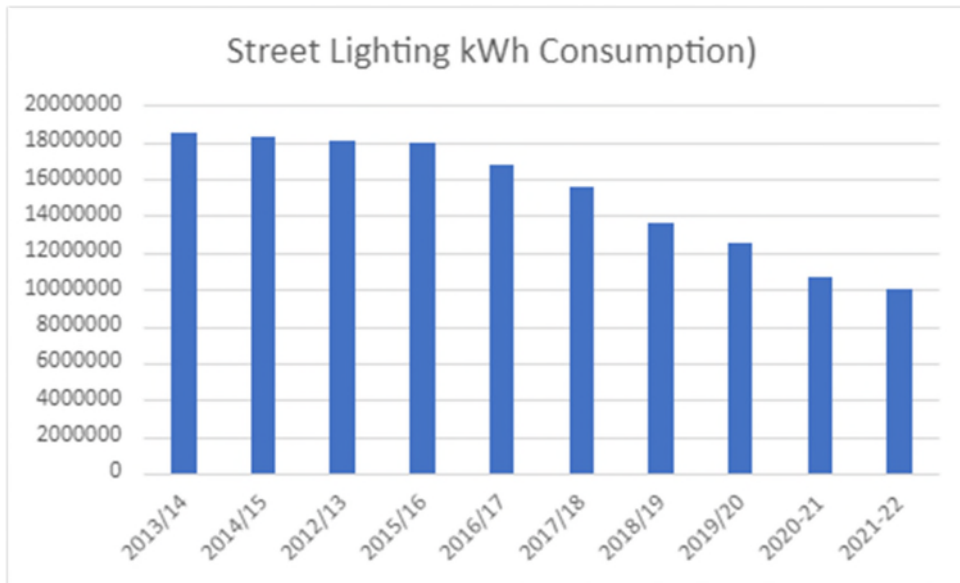
Report prepared by David Armitage, Roads Policy & Asset Manager & Keith Melvin,
Street Lighting Officer
Date: 27 May 2022

List of Appendices:

Appendix 1 - Histograms plotting energy consumption and carbon emissions over time
Appendix 2 - Integrated Impact Assessment

Appendix 1

2022 06 15 Sustainability Committee - Street Lighting LED Upgrade Programme



Aberdeenshire Council

Integrated Impact Assessment

STREET LIGHTING LED UPGRADE PROGRAMME

Assessment ID	IIA-000688
Lead Author	Keith Melvin
Additional Authors	John Bruce
Service Reviewers	David Armitage
Subject Matter Experts	Suzanne Rhind, Susan Forbes, Claudia Cowie, Kakuen Mo
Approved By	Philip McKay
Approved On	Wednesday June 01, 2022
Publication Date	Wednesday June 01, 2022

1. Overview

This document has been generated from information entered into the Integrated Impact Assessment system.

Assess the impact of the introduction of LED street lights.

During screening 6 of 10 questions indicated that detailed assessments were required, the screening questions and their answers are listed in the next section. This led to 4 out of 5 detailed impact assessments being completed. The assessments required are:

- Equalities and Fairer Scotland Duty
- Health Inequalities
- Sustainability and Climate Change
- Town Centres First

In total there are 15 positive impacts as part of this activity. There is 1 negative impact, the impact has been mitigated.

A detailed action plan with 1 points has been provided.

This assessment has been approved by philip.mckay@aberdeenshire.gov.uk.

The remainder of this document sets out the details of all completed impact assessments.

2. Screening

Could your activity / proposal / policy cause an impact in one (or more) of the identified town centres?	Yes
Would this activity / proposal / policy have consequences for the health and wellbeing of the population in the affected communities?	Yes
Does the activity / proposal / policy have the potential to affect greenhouse gas emissions (CO2e) in the Council or community and / or the procurement, use or disposal of physical resources?	Yes
Does the activity / proposal / policy have the potential to affect the resilience to extreme weather events and/or a changing climate of Aberdeenshire Council or community?	No
Does the activity / proposal / policy have the potential to affect the environment, wildlife or biodiversity?	Yes
Does the activity / proposal / policy have an impact on people and / or groups with protected characteristics?	Yes
Is this activity / proposal / policy of strategic importance for the council?	Yes
Does this activity / proposal / policy reduce inequality of outcome?	No
Does this activity / proposal / policy have an impact on children / young people's rights?	No
Does this activity / proposal / policy have an impact on children / young people's wellbeing?	No

3. Impact Assessments

Children's Rights and Wellbeing	Not Required
Climate Change and Sustainability	All Negative Impacts Can Be Mitigated
Equalities and Fairer Scotland Duty	No Negative Impacts Identified
Health Inequalities	No Negative Impacts Identified
Town Centre's First	No Negative Impacts Identified

4. Equalities and Fairer Scotland Duty Impact Assessment

4.1. Protected Groups

Indicator	Positive	Neutral	Negative	Unknown
Age (Younger)	Yes			
Age (Older)	Yes			
Disability	Yes			
Race		Yes		
Religion or Belief		Yes		
Sex		Yes		
Pregnancy and Maternity		Yes		
Sexual Orientation		Yes		
Gender Reassignment		Yes		
Marriage or Civil Partnership		Yes		

4.2. Socio-economic Groups

Indicator	Positive	Neutral	Negative	Unknown
Low income		Yes		
Low wealth		Yes		
Material deprivation		Yes		
Area deprivation		Yes		
Socioeconomic background		Yes		

4.3. Positive Impacts

Impact Area	Impact
Age (Older)	LED lighting produce white light which has a greater average colour rendering index(RA) than traditional high intensity discharge lights (HID) lamps. Traditional lamps produces orange glows which could produce monochrome lighting with poor definition. LED lighting produces full colour thus giving the perception of a brighter light. This whiter light highlights obstacles and provides better facial recognition. As people age their sight deteriorates, good LED lighting can help with navigating the footways and carriageways.
Age (Younger)	LED lighting produce white light which has a greater average colour rendering index(RA) than traditional high intensity discharge lights (HID) lamps.. Traditional lamps produces orange glows which could produce monochrome lighting with poor definition. LED lighting produces full colour thus giving the perception of a brighter light. This whiter light highlights obstacles and provides better facial recognition.

Impact Area	Impact
Disability	LED lighting produce white light which has a greater average colour rendering index(RA) than traditional high intensity discharge lights (HID) lamps.. Traditional lamps produces orange glows which could produce monochrome lighting with poor definition. LED lighting produces full colour thus giving the perception of a brighter light. This whiter light highlights obstacles and provides better facial recognition. Good LED lighting can help with navigating the footways and carriageways.

4.4. Evidence

Type	Source	It says?	It Means?
External Data	Institute of Lighting Professionals- Various Publication	There has been many research studies undertaken re the benefits of good LED lighting. LED lighting if designed well can give the perception of brighter lighting, which can help people with visual impairment, can illuminate obstacles and hazards on the footway and carriageway. Provides better contrast. Also been proven to reduce the fear of crime as LED lighting produces a white light which provides better facial recognition.	It can make footways and carriageways safer.

4.5. Overall Outcome

No Negative Impacts Identified.

The introduction of LED lighting does not have a negative impact on equalities. Well designed LED will provide better lighting for all users.

4.6. Improving Relations

The LED street lighting project has been well advertised and the benefits to the whole community are clear to see. The proposed works are highlighted in the local areas RMP plans which are approved by the local committees, the overall project was signed off by ISC and is also reported to the Sustainability Committee.

LED lighting has the ability to control the light emitted from the lantern, and thus reduces unwanted light which would otherwise fall into private gardens and onto the walls of some houses. Some homeowners welcome this light as it lights up their paths and front doors but others are against the unwanted light. Less light intrusion is also good for Flora and Fauna. We have had complaints that lighting levels are too high and also complaints the new LED lighting is too dim, and poorer than the previous street lighting. In these cases we have undertook desktop exercises and also undertook night time surveys. The majority of the complaints have been found to be none justified and the lighting levels were indeed compliant. Those we found to be justified have been actioned and remedial works undertaken to remove the problem.

5. Health Inequalities Impact Assessment

5.1. Health Behaviours

Indicator	Positive	Neutral	Negative	Unknown
Healthy eating		Yes		
Exercise and physical activity	Yes			
Substance use – tobacco		Yes		
Substance use – alcohol		Yes		
Substance use – drugs		Yes		
Mental health		Yes		

5.2. Positive Impacts

Impact Area	Impact
Exercise and physical activity	Improved street lighting can allow users to undertake walks and exercise during the hours of darkness

5.3. Evidence

Type	Source	It says?	It Means?
External Data	Institute of Lighting Professionals: External Publications	Well designed LED street lighting can allow users to undertake walks and exercise during the hours of darkness. This can also help reduce the use of motor vehicles for short journeys if the route is well maintained and well lit. A well lit footpath can give the perception of a safer route, can reduce the fear of crime, making it more inviting to use, Healthy body and healthy mind.	It can help with fitness and overall wellbeing.

5.4. Overall Outcome

No Negative Impacts Identified.

By installing LED with high RA values can give the the road user the perception of better lighting, provides increased facial recognition and the reduction in fear when out and about during the hours of darkness. Helps promote night time activities including taking exercise.

6. Sustainability and Climate Change Impact Assessment

6.1. Emissions and Resources

Indicator	Positive	Neutral	Negative	Unknown
Consumption of energy	Yes			
Energy efficiency	Yes			
Energy source		Yes		
Low carbon transition	Yes			
Consumption of physical resources	Yes			
Waste and circularity	Yes			
Circular economy transition		Yes		
Economic and social transition	Yes			

6.2. Biodiversity and Resilience

Indicator	Positive	Neutral	Negative	Unknown
Quality of environment		Yes		
Quantity of environment		Yes		
Wildlife and biodiversity			Yes	
Infrastructure resilience		Yes		
Council resilience		Yes		
Community resilience		Yes		
Adaptation		Yes		

6.3. Positive Impacts

Impact Area	Impact
Consumption of energy	LED lighting consumes less energy than traditional HID lamps.
Energy efficiency	LED lighting is more energy efficient than traditional HID lamps.
Economic and social transition	LED lights consume less energy so therefore less carbon, contributing to the councils carbon reduction targets. Street lighting contributes 6% of the councils energy consumption.
Low carbon transition	LED lanterns consume less energy than traditional HID lamps and thus help reduce carbon consumption.
Consumption of physical resources	LED lanterns have a whole life in excess of 50,000 hours. Traditional HID lamps had a life around 12,000 to 16,000 hours meaning they only last around 4 years. Less frequency to attend to repair also reduces fuel and carbon expenditure. Although all lamps are recycled through the WEEE scheme still they still use resources, by not changing lamps we also use less use of rare earth materials. No harmful mercury in LED lamps.
Waste and circularity	LED lanterns can be recycled, less waste going to landfill.

6.4. Negative Impacts and Mitigations

Impact Area	Details and Mitigation
Wildlife and biodiversity	<p>Research has shown that LED lights produce more blue light which can affect Flora and Fauna.</p> <p>Can be mitigated Yes</p> <p>Mitigation By using LED lights that are 3000K, will reduce blue light emitted by the LED. We also dim all our lights between 00.00-06.00 which also helps reduce the impact. We have two remote communities where the street lights are switched off at 01.00 and 5.30am, removing blue light emission altogether. We limit the installation of lighting in our parks.</p> <p>Timescale Ongoing till project ends in March 2024</p>

6.5. Evidence

Type	Source	It says?	It Means?
External Data	Various	LED lighting consumes less energy than traditional HID lamps. LED lighting is more controllable and all the produced light falls on the adopted surfaces. LED lights produce little unwanted light so reduces light pollution. LED lights also produce little or no upward light so reduces Sky glow.	Less energy is required to run LED lights, light pollution can be limited or almost removed altogether.
External Data	ILP PUBLICATIONS: A Review of the Impact of Artificial Light on Invertebrates	Advises on the affect of LED lighting on Invertebrates	Considerations needed when changing from old type HID lamps to LED due to the LED having a higher blue content than HID lamps.
External Data	ILP: Guidance Note 8: Bats and artificial lighting	Legal requirements for lighting and impact of artificial lighting and mitigation of artificial lighting on bats	Raises awareness of the impacts of artificial lighting on bats, and mitigation.

6.6. Overall Outcome

All Negative Impacts Can Be Mitigated.

LED has been around for many years and technology is advancing at a rapid pace. LED lighting consumes less power than traditional HID to do the same task. i.e. illuminate the adopted footways and carriageways. All produced light is directed to the adoptable surfaces with little unwanted light/ light pollution being produced. This project contributes to the councils overall goal of becoming Net Zero by 2045.

7. Town Centre's First Impact Assessment

7.1. Local Factors

Indicator	Positive	Neutral	Negative	Unknown
Town centre assets	Yes			
Footfall	Yes			
Changes to road layouts		Yes		
Parking		Yes		
Infrastructure changes		Yes		
Aesthetics of the town centre	Yes			
Tourism		Yes		
Public safety	Yes			
Town centre business	Yes			
Cultural heritage and identity		Yes		
Social and cultural aspects		Yes		

7.2. Positive Impacts

Impact Area	Impact
Aesthetics of the town centre	Good LED lighting can enhance the appearance of town centres.
Footfall	Better street lighting can help increase footfall during the hours of darkness which in turn can benefit the night time economy of our towns.
Public safety	Good LED lighting can give the perception of increased illumination, which in turn can lead to users being more confident in their surroundings. LED lighting has a high RA which helps increase facial recognition which again helps reduce the fear of crime.
Town centre assets	LED lighting produces more controlled lighting which when designed properly can enhance the features of buildings while at the same time illuminating the footways to a very high standard. As LED lights last 10x longer than HID lamps, less maintenance is required which results in less maintenance in the town centres which can lead to temporary closures, barriers being erected making the town centre less appealing which can affect footfall.
Town centre business	Better street lighting can help increase footfall during the hours of darkness which in turn can benefit the night time economy of our town

7.3. Evidence

Type	Source	It says?	It Means?
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Type	Source	It says?	It Means?
External Data	ILP	Better designed street lighting can enhance town centres	Can increase footfall and business patronage, helping business turnover and attracting more of both.

7.4. Overall Outcome

No Negative Impacts Identified.

Good LED lighting can enhance our town centres, which can attract night time activities which in turn helps businesses such as pubs and restaurants, increased patronage can lead to greater employment, new business opening all which help attract more of both.

Good LED Lighting can have a positive impact on social and cultural aspects of town centres, encouraging people of all ages to meet socially any time of the day.

8. Action Plan

Planned Action	Details
To continue with the implementation of LED energy reduction program	<p>Lead Officer Keith Melvin</p> <p>Repeating Activity No</p> <p>Planned Start Friday April 01, 2022</p> <p>Planned Finish Sunday March 31, 2024</p> <p>Expected Outcome To convert all street lights to LED</p> <p>Resource Implications Internal resource to be used to undertake the design work and deliver the project. Both internal and external resource to be used to undertake the installation of the LED lanterns.</p>

REPORT TO SUSTAINABILITY COMMITTEE – 15 JUNE 2022

FUTURE MEETING ARRANGEMENTS

1 Executive Summary/Recommendations

1.1 On 23rd September 2021 the Council agreed to introduce a Choice Based Blended Model of Fully Virtual and Hybrid Meetings, which incorporates the principle that meeting groups should be able to choose how they want to meet. Work is currently ongoing to develop an options appraisal for upgrading Council venues to provide a high quality hybrid experience. In the meantime this report asks the Committee to confirm preferred arrangements for meetings for 2022/2023, having regard to existing limitations including availability of audio visual equipment and staffing resources.

1.2 The Committee is recommended to:

1.2.1 **Note the options for fully virtual and hybrid meetings of the Committee as outlined in section 3 of this report; and**

1.2.2 **Agree the preferred arrangements for the meetings listed in Appendix 1 to this report.**

2 Decision Making Route

2.1 Full Council agreed to adopt a Choice Based Blended Model of Fully Virtual and Hybrid Meetings at its meeting on 23rd September 2021. The principles of the Choice Based Blended Model provide that meeting groups should be given the choice of whether they want to meet on a fully virtual or hybrid basis.

2.2. On 28 April 2022 Full Council agreed to instruct an options appraisal for the upgrading of audio and visual equipment in Council venues to facilitate a high quality hybrid experience. In the meantime it was agreed that meeting groups would be asked to confirm their preferred meeting arrangements, having regard to the audio visual provision in existing venues.

3 Discussion

3.1 The list of Committee meetings for 2022/2023 forms **Appendix 1** to this report. Prior to the Covid-19 pandemic, the Committee met regularly in person in Committee Room 5, Woodhill House.

3.2 Since the onset of the Covid-19 pandemic, the Committee has met on a fully virtual basis. Following the decision of Full Council on 23 September 2021 the hybrid meetings were held in Committee Room 5 for some Policy Committees and Audit Committee. Feedback from recent meetings has been positive

following work carried out to the microphones in the room, in terms of the audio and visual quality for both in person and virtual attendees.

3.3 The options for meeting arrangements for this Committee are:-

- (i) *Fully Virtual* – meetings would take place on the Microsoft Teams platform with all attending virtually and the meeting livestreamed to ensure public access.
- (ii) *Hybrid* – meetings would take place in Committee Room 5, with a mixture of in person attendees and virtual attendees using the Microsoft Teams platform. The meeting would be livestreamed where possible.

3.4. The Committee may also choose to encourage in person attendance for specified meetings, however in line with the principles agreed by Full Council in terms of the Choice Based Blended Model a virtual option must always be available at the meeting venue for those Members or officers who wish to attend virtually.

4 Council Priorities, Implications and Risk

4.1 The facilitation of Committee meetings helps the Council deliver all six Strategic Priorities and the underlying principle of right people, right places, right time.

4.2 The table below shows whether risks and implications apply if the recommendations are agreed.

Subject	Yes	No	N/A
Financial			x
Staffing	x		
Equalities and Fairer Duty Scotland	x		
Children and Young People's Rights and Wellbeing			x
Climate Change and Sustainability	x		
Health and Wellbeing	x		
Town Centre First	x		

4.3 There are staffing implications in the provision of hybrid meetings, as additional Committee staff are required in order to facilitate the meeting. The impact on resources is being closely monitored.

4.4 The integrated impact assessment previously carried out and reported to Full Council on [23 September 2021](#) (Item 13) remains relevant and there have been no material changes since that date. There is a positive impact on the protected groups Disability and Pregnancy and Maternity in ensuring there is an option for virtual attendance at meetings.

- 4.5 The following Risks have been identified as relevant to this matter on a Corporate Level: ACORP004 – Business and Organisational Transformation ACORP006 – Reputational Management ACORP009 – Operational Risk Management (including health and safety).

5 Scheme of Governance

- 5.1 The Head of Finance and Monitoring Officer within Business Services have been consulted in the preparation of this report and their comments are incorporated within the report. They are satisfied that the report complies with the [Scheme of Governance](#) and relevant legislation.
- 5.2 The Committee is able to consider and take a decision on this item in terms of of the [List of Committee Powers in Part 2A](#) of the Scheme of Governance as it relates to the approval of meeting arrangements for the Committee in order to deliver the functions delegated to it.

Ritchie Johnson
Director of Business Services

Report prepared by Ruth O'Hare, Legal Services Manager
Date: 27 May 2022

List of Appendices:

Appendix 1 – List of Meetings 2022/2023

Appendix 1 - Future Meetings of Sustainability Committee

14 September, 2022 at 10.15 a.m.

30 November, 2022, at 10.15 a.m.

23 February, 2023, at 10.15 a.m.