

**Subject:** Environmental Policy for Brighton & Hove City Council

**Date of Meeting:** 13 October 2009

**Report of:** Director of Strategy & Governance

**Contact Officer:** Name: Mita Patel Tel: 29-3332  
E-mail: mita.patel@brighton-hove.gov.uk

**Key Decision:** No

**Wards Affected:** All

### FOR GENERAL RELEASE

#### 1. SUMMARY AND POLICY CONTEXT:

- 1.1 This report outlines the rationale for development of a corporate Environmental Policy Statement (or Environmental Policy).
- 1.2 In February 2009 members approved the implementation of an Environmental Management System. Two pilot projects were selected for implementation in two different service areas – fleet and venues. An Environmental Policy is a required document for these and would also be a first step should the council move forward with implementing the Environmental Management System across the whole council once the pilots have been evaluated.
- 1.3 In submitting evidence to the Audit Commission for the council's Use of Resources assessment (Key Line of Enquiry 3.1) the council recently said it would adopt an Environmental Policy this autumn. So this forms a timely part of the evidence base.

#### 2. RECOMMENDATIONS:

- 2.1 That the Cabinet Committee approves the Environmental Policy for the Council as at Appendix 1.

#### 3. RELEVANT BACKGROUND INFORMATION/CHRONOLOGY OF KEY EVENTS:

##### The Corporate Plan and Value for Money

- 3.1 In line with its prioritisation of achieving efficiency and value for money in last year's Annual Report and in the Corporate Plan 2008-2011, the council highlighted its objective for achieving a status of 'performing well' in the Audit Commission's Use of Resources assessment, by 2011. As part of ensuring this, a more comprehensive environmental footprint profile will be needed for the Annual Report than is currently provided.

## **CAA and Use of Resources assessment**

- 3.2 The CAA process through its Use of Resources (UoR) 2009 assessment sets new, stringent requirements for the council on its environmental management. In order to achieve an 'excellent' score the council would ultimately need to have a robust performance management strategy based on a good understanding of its use of all natural resources. Furthermore, the council needs to have systems and processes in place across its operations including:
- Proof that it has a strategic and managed approach to reducing the use of natural resources and its impact on the environment;
  - Evidence to illustrate which of its operations produce most carbon and is targeting these areas as a priority.
- 3.3 The initial feedback received in July from the recent Audit Commission after assessment under section 3.1 Use of Natural Resources was that we were likely to receive a score of 3 / 4: performing well/excellent in this area. They commented that there were "elements of notable practice and that the overall arrangements for sustainability are excellent and beyond that of most other authorities". We clearly need to ensure that we not only maintain but improve on this over the coming years.

## **Proposals for way forward**

### *Environment Policy – Background*

- 3.4 An Environmental Policy is 'a statement of the aims and principles of an organisation in relation to its overall environmental performance, including compliance with all relevant regulatory requirements and giving rise to the organisation's objectives and targets' [source: BS EN ISO 14001/EMAS].
- 3.5 An Environmental Policy draws together all strands of environmental work across all Directorates and acts as a cohesive document that will ensure corporate working toward the same outcomes under the same objectives.
- 3.6 The purpose of the Policy document is for setting a framework for delivering good environmental performance across the organisation. By nature it should be a brief and cover the most significant areas relating to the council's environmental performance.
- 3.7 As the Policy would be a public document, it would both communicate the Council's key environmental aims and objectives to the wider city and external partners, and also demonstrate to them our commitment to continued environmental performance.

### *Current progress*

- 3.8 A draft Environmental Policy has been developed (see Appendix 1). This has been developed in wide consultation with officers from relevant teams and departments from across the organisation.

### *Desirable Outcomes*

- A cohesive and co-ordinated approach to environmental work across all Directorates.
- A demonstrable and transparent commitment to minimising harmful affects from Council operations and service delivery.
- Demonstrating excellence in environmental management

### *Monitoring and Evaluation*

- 3.9 The Environmental Policy will be reviewed, and if necessary updated, annually.

### **Next steps**

- 3.10 Integrate the Environmental Policy within the new communications campaign on environmental sustainability for the council.
- 3.11 Publish the Environmental Policy and publicise it to the wider public.

## **4. CONSULTATION**

- 4.1 The Chief Executive, all Directors and officers from the following service areas and teams have been consulted: City Parks, City Services, Sustainable Transport, Housing Strategy, Property and Design, Chief Executives Policy Unit, Audit and Business Risk, Communications, Performance, Planning Strategy, and Corporate Procurement.

## **5. FINANCIAL & OTHER IMPLICATIONS:**

### Financial Implications:

- 5.1 There are no direct financial implications of the recommendation of the report, but it is hoped that the adoption of an Environmental Policy and associated Environmental Management System will lead to savings in waste, water and energy costs.
- 5.2 It is important to note that although in some areas (eg fleet, street lighting) there would be a need for considerable outlay in order to upgrade existing products, such as vehicles and street lights, there are likely to be considerable savings made i.e. through an improved management of fleet and use of more energy efficient alternatives.
- 5.3 In respect of the costs of monitoring the Policy, these will be met within the existing budget allocation of the Policy Unit, and any detailed work arising from the Policy will need to be met within the resources allocated to relevant teams of the council.

*Finance Officer Consulted: Peter Francis*

*Date: 08/09/09*

#### Legal Implications:

- 5.4 The development and, more importantly, the implementation of an Environmental Policy Statement should assist the council in contributing to the mandatory carbon reduction commitment (CRC) provided for by the Climate Change Act 2008.
- 5.5 The CRC is intended to encourage large non-energy intensive users to promote their energy and carbon emissions management skills by introducing financial incentives and penalties. The scheme will cover the council and begins in April 2010.

*Lawyer Consulted:*

*Oliver Dixon*

*Date: 24/08/09*

#### Equalities Implications:

- 5.6 A formal Environmental Policy Statement provides:
- access to the public of the council's commitment to improving its environmental performance and provides evidence of its environmental objectives;
  - a clear framework for active involvement of all council staff from all areas of the council in working to improve the council's environmental performance;
  - an opportunity to engage with the public in open dialogue about the environmental objectives of the council in all relevant service areas.

#### Sustainability Implications:

- 5.7 A corporate Environmental Policy would provide written evidence of the council's commitment to ongoing environmental improvement and clearly identify the council's overall aims and objectives with respect to its environmental performance targets. Furthermore, an Environmental Policy is a required document for implementation of the council's two pilot Environmental Management System projects in both fleet and venues.

#### Crime & Disorder Implications:

- 5.8 None identified.

#### Risk & Opportunity Management Implications

- 5.9 A formal risk assessment will need to be undertaken to fully assess the key risks and opportunities involved for having a corporate Environmental Policy. The Corporate Risk Register already recognises Corporate Risk 17 "Investing in the City's Sustainable Future". The introduction of an Environmental Policy could contribute to progression of actions to address this Corporate Risk.
- 5.10 There is a reputational risk that critics will ask why the council hasn't adopted an environmental policy before. This is not a strong argument for not adopting one now.

- 5.11 There is a risk that the Policy may be used against the council in some policy areas. This is mitigated by phrases in the context like “whilst taking into account social and economic constraints”, “where appropriate” and “where possible”.

Corporate / Citywide Implications:

- 5.12 Having a corporate Environmental Policy would demonstrate city council leadership through commitment to getting its own house in order and to achieving improving environmental performance, as well identify key corporate environmental objectives.

**6. EVALUATION OF ANY ALTERNATIVE OPTION(S):**

- 6.1 The alternative options for an Environmental Policy as outlined in this report include the following:
- (a) An Environmental Policy focusing only on the two pilot projects that have been selected for implementation of an Environmental Management System: Fleet and Venues.
    - This would only commit action and investment of resources to a limited part of the organisation and so is not a very tenable position for achieving our corporate ambitions for the Council as a whole.
  - (b) A longer, more thorough Environmental Policy Document that would provide detailed information on environmental performance in all service areas across the organisation.
    - This option would not follow the usual format for an environmental policy, which is an over-arching framework and set of principles. It would require a substantial amount more work to be undertaken that would not be possible by the Audit Commission’s deadline.

**7. REASONS FOR REPORT RECOMMENDATIONS**

- 7.1 A drive for efficiency and Value for Money coupled with new environmental performance requirements in the UoR assessment mean that a more comprehensive and accountable environmental management approach is required.
- 7.2 The approved implementation of a formal EMS requires development of an Environmental Policy. This is required for successfully achieving ISO 14001 certification in our pilot EMS projects.
- 7.3 An Environmental Policy is an important and necessary first step for ensuring we are getting our on house in order and leading by example.

## **SUPPORTING DOCUMENTATION**

### **Appendices:**

1. Draft Environmental Policy for Brighton & Hove City Council

### **Documents in Members' Rooms**

None

### **Background Documents**

None