Public Document Pack

Planning, Environment & Sustainability Policy Development Group

Tuesday, 23 September 2025 at 5.30 pm
Phoenix Chambers, Phoenix House, Tiverton

Next ordinary meeting
Tuesday, 25 November 2025 at 5.30 pm

Please Note: This meeting will take place at Phoenix House and members of the public and press are able to attend via Teams. If you are intending to attend in person please contact the committee clerk in advance, in order that numbers of people can be appropriately managed in physical meeting rooms.

The meeting will be hybrid and an audio recording made and published on the website after the meeting.

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Meeting ID: 380 671 104 468
Passcode: tw64Xg2N

Membership

Cllr B Fish
Cllr G Cochran
Cllr C Adcock
Cllr G Czapiewski
Cllr A Glover
Cllr C Harrower
Cllr A Stirling
Cllr G Westcott

A G E N D A

Members are reminded of the need to make declarations of interest prior to any discussion which may take place

1 **Apologies and Substitute Members**
To receive any apologies for absence and notices of appointment of substitute Members (if any).

Committee Administrator: Angie Howell
Tel: 01884 234251
Email: ahowell@middevon.gov.uk

2 **Public Question Time**
To receive any questions from members of the public and replies thereto.
Note: A maximum of 30 minutes is allowed for this item.

3 **Declarations of Interest under the Code of Conduct**
To record any interests on agenda matters.

4 **Minutes of the Previous Meeting** *(Pages 7 - 10)*
To consider whether to approve the minutes as a correct record of the meeting held on 29 July 2025.

5 **Chair's Announcements**
To receive any announcements that the Chair may wish to make.

6 **Performance Dashboard Q1** *(Pages 11 - 12)*
To receive performance information from the Corporate Performance & Improvement Manager for Quarter 1 (2025/2026).

7 **Medium Term Financial Plan** *(Pages 13 - 34)*
To receive a report from the Deputy Chief Executive (S151) presenting to Member's the updated Medium Term Financial Plan (MTFP) which covers the period 2026/27 to 2028/29 and to discuss initial options for cost pressures/savings or income related to the services covered by this Policy Development Group (PDG).

8 **Cabinet Member for Environment and Climate Change Update** *(Pages 35 - 76)*
To receive an update from the Cabinet Member for Environment and Climate Change and the Climate Sustainability Officer.

9 **Motion 608 - Anaerobic Digester Plants** *(Pages 77 - 84)*
To receive a report to discusses options available to Members around the production of further (supplementary) planning policy or guidance in relation to the development and management of Anaerobic Digester plants within Mid Devon.

10 **Planning Summary Report** *(Pages 85 - 90)*
To receive a Planning Summary Report from the Director of Place and Economy.

Committee Administrator: Angie Howell
Tel: 01884 234251
Email: ahowell@middevon.gov.uk

11 **Identification of Items for the next meeting**

Members are asked to note that the following items are already identified in the work programme for the next meeting:

- Performance Dashboard for Q2
- Draft budget (round 2)
- Climate and Sustainability Update
- Planning Summary Report

Note: This item is limited to 10 minutes. There should be no discussion on the items raised.

Committee Administrator: Angie Howell
Tel: 01884 234251
Email: ahowell@middevon.gov.uk

Stephen Walford
Chief Executive
Monday, 15 September 2025

Guidance notes for meetings of Mid Devon District Council

From 7 May 2021, the law requires all councils to hold formal meetings in person. The Council will enable all people to continue to participate in meetings via Teams.
If the Council experience technology difficulties at a committee meeting the Chairman may make the decision to continue the meeting 'in-person' only to conclude the business on the agenda.

1. Inspection of Papers
Any person wishing to inspect minutes, reports, or the background papers for any item on the agenda should contact Democratic Services at Committee@middevon.gov.uk

They can also be accessed via the council's website Click Here

Printed agendas can also be viewed in reception at the Council offices at Phoenix House, Phoenix Lane, Tiverton, EX16 6PP.

2. Members' Code of Conduct requirements
When considering the declaration of interests and their actions as a councillor, Members are reminded of the requirements of the Members' Code of Conduct and the underpinning Principles of Public Life: Honesty; Integrity; Selflessness; Objectivity; Accountability; Openness; Leadership.
The Code of Conduct can be viewed here:

3. Minutes of the Meeting
Details of the issues discussed, and recommendations made at the meeting will be set out in the minutes, which the Committee will be asked to approve as a correct record at its next meeting. Minutes of meetings are not verbatim.

4. Public Question Time
Residents, electors or business rate payers of the District wishing to raise a question and/or statement under public question time are asked to provide their written questions to the Democratic Services team by 5pm three clear working days before the meeting to ensure that a response can be provided at the meeting. You will be invited to ask your question and or statement at the meeting and will receive the answer prior to, or as part of, the debate on that item. Alternatively, if you are content to receive an answer after the item has been debated, you can register to speak by emailing your full name to Committee@middevon.gov.uk by no later than 4pm on the day before the meeting. You will be invited to speak at the meeting and will receive a written response within 10 clear working days following the meeting.
Notification in this way will ensure the meeting runs as smoothly as possible

Committee Administrator: Angie Howell
Tel: 01884 234251
Email: ahowell@middevon.gov.uk

5. Meeting Etiquette for participants
• Only speak when invited to do so by the Chair.
• If you're referring to a specific page, mention the page number.

For those joining the meeting virtually:
• Mute your microphone when you are not talking.
• Switch off your camera if you are not speaking.
• Speak clearly (if you are not using camera then please state your name)
• Switch off your camera and microphone after you have spoken.
• There is a facility in Microsoft Teams under the ellipsis button called "turn on live captions" which provides subtitles on the screen.

6. Exclusion of Press & Public
When considering an item on the agenda, the Committee may consider it appropriate to pass a resolution under Section 100A (4) Schedule 12A of the Local Government Act 1972 that the press and public be excluded from the meeting on the basis that if they were present during the business to be transacted there would be a likelihood of disclosure of exempt information, as defined under the terms of the Act. If there are members of the public and press listening to the open part of the
meeting, then the Democratic Services Officer will, at the appropriate time, ask participants to leave the meeting when any exempt or confidential information is about to be discussed. They will be invited to return as soon as the meeting returns to open session.

7. Recording of meetings
All media, including radio and TV journalists, and members of the public may attend Council, Cabinet, PDG and Committee meetings (apart from items Media and Social Media Policy - 2023 page 22 where the public is excluded) you can view our Media and Social Media Policy here. They may record, film or use social media before, during or after the meeting, so long as this does not distract from or interfere unduly with the smooth running of the meeting. Anyone proposing to film during the meeting is requested to make this known to the Chairman in advance. The Council also makes audio recordings of meetings which are published on our website Browse Meetings, 2024 - MIDDEVON.GOV.UK.

8. Fire Drill Procedure
If you hear the fire alarm you should leave the building by the marked fire exits, follow the direction signs and assemble at the master point outside the entrance. Do not use the lifts or the main staircase. You must wait there until directed otherwise by a senior officer. If anybody present is likely to need assistance in exiting the building in the event of an emergency, please ensure you have let a member of Democratic Services know before the meeting begins and arrangements will be made should an emergency occur.

9. WIFI
An open, publicly available Wi-Fi network is normally available for meetings held in the Phoenix Chambers at Phoenix House.

Committee Administrator: Angie Howell
Tel: 01884 234251
Email: ahowell@middevon.gov.uk

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MINUTES of a **MEETING** of the **PLANNING, ENVIRONMENT & SUSTAINABILITY POLICY DEVELOPMENT GROUP** held on 29 July 2025 at 5.30 pm

Present Councillors	B Fish (Chair) G Cochran (Vice-Chair), C Adcock, A Glover, A Stirling and G Westcott
Apologies Councillors	G Czapiewski and C Harrower
Also Present Officers	Richard Marsh (Director of Place & Economy), Jason Ball (Climate and Sustainability Specialist) and Angie Howell (Democratic Services Officer)
Councillors Online	E Buczkowski, J Buczkowski, G Duchesne, S Keable, L G J Kennedy and L Taylor
Officers Online	Tristan Peat (Forward Planning Team Leader) and Laura Woon (Democratic Services Manager)

15 APOLOGIES AND SUBSTITUTE MEMBERS

Apologies were received from Cllr G Czapiewski.

16 PUBLIC QUESTION TIME

There were no public questions.

17 MINUTES OF THE PREVIOUS MEETING

The minutes of the meeting held on 10 June 2025 were approved as a correct record of the meeting and **SIGNED** by the Chair.

18 DECLARATIONS OF INTEREST UNDER THE CODE OF CONDUCT

Members were reminded of the need to declare any interests where appropriate.

No interests were declared under this item.

19 CHAIR'S ANNOUNCEMENTS

The Chair reminded the Group that the draft Devon Local Nature Recovery Strategy (LNRS) had not been published and asked Members to ensure that discussions previously made at the Planning Policy Development Group were not disclosed as the Strategy was not yet in the public domain.

20 DRAFT DEVON LOCAL NATURE RECOVERY STRATEGY

The Group had before it a report * from the Director of Place and Economy considering the draft Devon Local Nature Recovery Strategy which was presented by the Climate and Sustainability Specialist.

The following was highlighted within the report:-

- The draft Devon Local Nature Recovery Strategy was a work in progress and was not the final version.
- The role of the Strategy was to inform nature recovery at a local level. It mapped out habitats, featured key species and enabled opportunities and priorities in nature recovery to be identified.
- The resources would help people such as farmers, landowners, planning officers and members of the public to understand how to boost nature and ecological connectivity.
- All Local Authorities had a duty to conserve and enhance biodiversity and must have a regard to their Local Nature Recovery Strategy.
- The Strategy had been produced by Devon County Council (DCC) with Mid Devon District Council being a supporting Authority. DCC were aiming for a public consultation in September 2025.
- Additional benefits included wider topics such as climate change adaptation and mitigation, water quality, natural capital ecosystem services and wellbeing.
- The Strategy would comprise a website with interactive mapping to enable access to local data and give information relevant to individuals and provided an overview of the importance of Devon's wildlife. It provided explanations of priorities and actions required to conserve and enhance wildlife.
- The website was interactive, exciting, interesting and offered inspiration – it provided information such as:-
    - Important species and approximate areas where you could locate them such as dragonflies etc.
    - The location of schools and community centres showing 500-metre zones, to help illustrate where the nearest area of nature or green space would be accessible to communities.
    - Different layers of information that could be used depending on need and perspective.
    - Powerful tools and resources for the viewer to use.
    - Funding decisions and the direction and prioritization of funding would be influenced by the LNRS.
- Copywriting specialists had been employed to ensure the website was written in such a way that would be easily understood.

Discussion took place regarding:-

- Whether the website would accommodate the reporting of beavers or other species moving about in the District? It was explained that it would not be a data gathering website as once it was published it would remain static until a new version would be approved as part of a Statutory Review.
- Wildlife corridors, the relationship between producing food and biodiversity and protecting nature.
- Water quality in rivers and seas.
- Whether the website afforded additional protection to certain sites recorded on the database – it was explained that this would not be the case as the Strategy was not legislation.
- Whether the website could be utilized for Planning – it was explained that every Planning Authority would need to have a regard for the Strategy when making planning decisions and in development of their Local Plan. Developers would also be required to undertake their own specific surveys although the Strategy would be useful for highlighting potential issues and opportunities.

The Chair advised the Group that the wording to the first recommendation would slightly differ to that in the report. It would read as follows:-

RECOMMENDED to the Cabinet that:-

1. Approval is given to Devon County Council that the draft Devon Local Nature Recovery Strategy is published and that it should go out for public consultation.

2. Delegated authority is given to the Director of Place and Economy, in conjunction with the Cabinet Member for Planning and Economic Regeneration and the Cabinet Member for Environment and Climate Change, to make or approve any minor amendments to the consultation materials.

(Proposed by Cllr A Glover and seconded by Cllr G Cochran)

Reason for the decision

As set out in the report.

Note *Report previously circulated.

(The meeting ended at 6.11 pm) **CHAIR**

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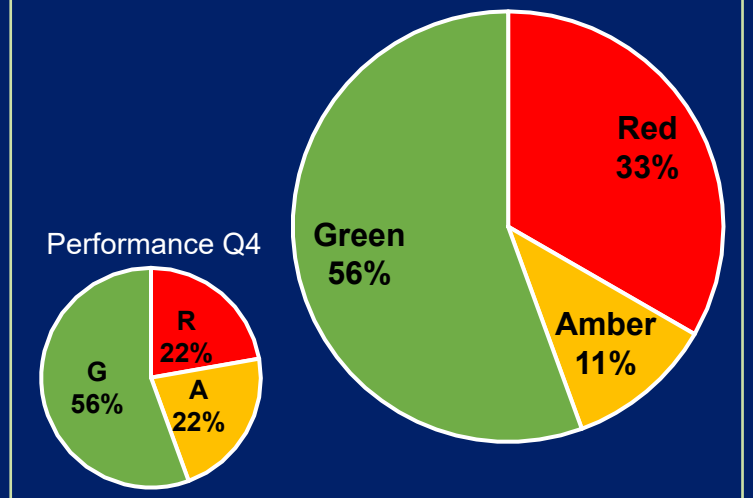
Planning, Environment & Sustainability PDG Performance Dashboard – Quarter 1 2025/26

Performance Measures	Performance	Annual Target	RAG
Own fleet CO2e avoided (YTD)	6.4 t CO_2e	10 t CO_2e	G
Solar panel performance – corporate estate (YTD)	36 t CO_2e	50 t CO_2e	G
Electric car charger points installed across MDDC sites (YTD)	0	4	R
Householder planning applications determined within 8 weeks (Past 12 months)	100 %	70%	G
Minor applications overturned at appeal (Past 12 months)	0.5 %	10%	G

Finance Measures	Performance	Annual Target	RAG
PE&S PDG – Projected Outturn	£1,183k	£1,227k	G
PE&S PDG – Projected Capital Outturn	£1,014k	£5,219k	R
PE&S PDG – Capital Slippage % of projects (Current)	100%	0%	R
Building Control Income – Projected Outturn	£231k	£251k	A

Corporate Risk	Risk Rating (Trajectory)
Failure to meet Climate Change Commitments by 2030	15 (No Change)

Overall Performance Q1



In Focus

Electric vehicle charger points – Whilst this performance indicator is showing as Red, it should be noted that we remain ahead of schedule, with six charge points delivered in 2024/25 against an annual target of four.

Carbon footprint – The Council's carbon footprint for 2024/25 has been calculated and is reported to the September PES PDG meeting.

The Green Enterprise Grant scheme for 2025/2026 was launched in Q1 and began to receive expressions of interest.

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Report for: **PES Policy Development Group**

Date of Meeting:	23 September 2025
Subject:	Medium Term Financial Plan
Cabinet Member:	Cllr John Downes – Cabinet Member for Governance, Finance and Risk
Responsible Officer:	Andrew Jarrett – Deputy Chief Executive (S151)
Exempt:	N/a
Wards Affected:	All
Enclosures:	Appendix 1 – GF MTFP Summary Position Appendix 2 – Emerging GF Budget Pressures Appendix 3 – PES PDG GF Savings Options Appendix 4 – All Savings Options

Section 1 – Summary and Recommendation(s)

To present to Member's the updated Medium Term Financial Plan (MTFP) which covers the period 2026/27 to 2028/29 and to discuss initial options for cost pressures/savings or income related to the services covered by this Policy Development Group (PDG).

Recommendation(s):

That Members of the Policy Development Group:

1. **Note the updated MTFP position for both the General Fund and Housing Revenue Account covering the years 2026/27 to 2028/29;**
2. **Consider and recommend to Cabinet the Budget Proposals as set out in Appendices 2 and 3, and where further savings should be sought and to what level.**

Section 2 – Report

1.0 Executive Summary

1.1 This report briefly summarises the information included within the September 2025 Cabinet Report, outlining the financial uncertainty faced by the council for the period 2026/27 to 2028/29. Specifically, it focuses on aspects relevant to this Policy Development Group (PDG).

1.2 The 5-year timeframe usually covered by the MTFP is not applicable due the Government's previous announcement of Local Government Reorganisation (LGR) for authorities within Devon. The current expected date for commencement of the new entity, in whatever form, is April 2028. However, to show a meaningful MTFP period, we have continued financial estimations through to 2028/29.

1.3 2026/27 is an exceptional year in terms of funding for the sector. The Government have announced that practically all the various funding mechanisms within the sector will alter. This leads to an unprecedented level of uncertainty and makes it practically impossible to explain let alone forecast and plan for.

1.4 It is understood that the Council has been targeted as part of a minority group of around 50 authorities that will be one of the biggest losers based on their initial draft calculations on funding – which would see us targeted for between a 5-7% real terms cut in 2026/27 as opposed to the 0% cash floor applied to the remaining c300 authorities. The funding baseline to which this cut will apply is not clear, but if this is applied the funding shortfall will be in the region of £2m - £3m.

1.5 However, there are other new sources of funding expected outside of the settlement that will reduce the impact. The Extended Producer Responsibility (EPR) Grant was introduced late in the budget process for 2025/26. Government have indicated that similar levels of funding should be available in future years, albeit that as producers reduce the volume of packaging, the grant received will fall. Similarly, we assume that all authorities will receive a share of the Weekly Food Collection Grant funding in the future. Currently the Government is not providing any indicative figures and timing of such announcements is likely to be at the same time as the funding settlement.

1.6 The above paragraphs demonstrate the high degree of uncertainty that remains on what level of funding might be received from 2026/27 onwards. There is ongoing modelling by the Ministry of Housing, Communities and Local Government (MHCLG) on the new funding formulae and only in late November / early December are we expecting full clarity of our individual position.

2.0 Introduction and purpose of the Medium Term Financial Plan

2.1 The main purpose of the MTFP is to show how the Council will strategically manage its finances in order to support the delivery of the priorities detailed in the Corporate Plan 2024 – 2028 and future years beyond that plan.

2.2 The MTFP helps strategically plan the budget setting process, but of equal importance, gives Management and Members an overview of future budget gaps so strategic decisions can be made over levels of future spending, Council Tax levels, policies for fees and charges, asset investment or disposal, etc.

3.0 Framework for the Medium Term Financial Plan

3.1 The starting base for the MTFP is the 2024/25 approved budget, which is then adjusted for any supplementary estimates approved by the Council or any significant budget variances identified in the monthly budget monitoring report to the Cabinet.

3.2 This base then has to be adjusted for unavoidable costs, such as, pay increases, inflation, service pressures associated with new legislation, a growing residential or business property base or improving performance, etc. The MTFP will also consider forecasts for investment receipts and income from fees and charges.

3.3 Finally the MTFP considers and makes assumptions regarding future levels of funding, in particular Council Tax including the potential growth in tax base, Business Rates again including any movement in the baseline as well as changes in the reliefs, multipliers and overall retention levels. Forecasts are also made for the likely level of future Central Government funding based on a range of assumptions. As a consequence, **Appendix 1** illustrates possible risks within the plan and the potential financial sensitivity to changes in the assumptions.

4.0 The Underlying Principles – still applicable?

4.1 The Council previously adopted the following underlying principles as a base assumption during the life of the MTFP:

4.1.1 Principle 1 – General Fund Reserves

- Each year the Council will target a balanced revenue budget without the use of General Fund reserve balances. The level of predicted deficits over the period of this plan may ultimately require the application of reserves to a degree to achieve the mandatory balance. However, this option is not

reflected in the numbers presented and must only be considered as a last resort;

- The Council faces considerable financial risks that can have a potentially significant and immediate impact on its finances. The MTFP will attempt to ensure that the General Fund Reserve balance does not fall below the current minimum agreed level (£2m).

Whilst every effort will be made to identify efficiency savings, given the scale of the likely funding reductions it is unlikely that a sufficient level can be identified to fully balance the 2026/27 budget without significant implications on service provision. Also, there is an extremely limited time frame available between finalisation of the funding settlement and setting the budget for 2026/27. Therefore, as a result of this combination of issues, it is highly likely that some level of draw from reserves will be required, and a full review of Earmarked Reserves will be necessary to see what can be realigned, and whether a minimum balance of £2m in General Reserves can be maintained.

4.1.2 Principle 2 – Optimise Income Generation

- Council Tax funds the largest share of the Council's budget. Annual increases will be kept within Government set guidelines. In reality this now gives the Council very little scope to significantly increase Council Tax income as the recent nationally prescribed referendum rate has been limited to a maximum of 2% or £5. This plan assumes that this rate will remain unaltered throughout the five year cycle;

It should be noted that Government expect all councils to maximise the increase in Council Tax in line with the referendum limits. Furthermore, the Government continue to raise additional flexibilities within the Council Tax scheme as possible options to mitigate the impact of the substantial funding reductions.

- The Council will continue to look at opportunities to generate additional sustainable income. This could be through reviews of existing Fees and Charges or through new charges for discretionary services. Such charges should be set at levels that are appropriate and proportionate to the costs of the service they are delivering and the market within which they operate. The Council will continue to explore new commercial opportunities (as a 'business as usual' model is clearly no longer deliverable).

In reality, the current fees are at the higher end of the scale locally, meaning that only inflationary increases are likely to be tolerated by the local marketplace.

4.1.3 Principle 3 – Allocation of Revenue Resources

- Resources will be directed to high priority and statutory services and hence away from low priority services, which will likely result in less investment in discretionary areas. With the exception of spend to save projects on lower priority services that can either cut future costs or increase revenue to enable cross subsidisation of higher priority services;

- It will seek to deliver further efficiency in its service delivery models and secure procurement savings in its new contractual arrangements which will then be factored into future spending plans. Note that opportunities to improve efficiency reduce over time and now only deliver benefits at the margins. Similarly, effective procurement does not always deliver savings as it is dependent upon market conditions at that time.

Following the LGR announcement, opportunities for new service delivery models are not deliverable in the timeframe. Similarly, financial gains from longer term contracts will be limited by the reduced timeframe.

4.1.4 Principle 4 – Allocation of Capital Resources

- The Council will continue to prioritise schemes, for instance to generate income, to meet corporate objectives and to enhance its asset base;

- The Council will continue to ensure it provides Value for Money through the efficient and effective use of its assets. The Council will look to dispose of surplus assets in order to maximise capital receipts and reduce ongoing revenue maintenance costs associated with holding the asset. Careful consideration will also need to be used to ensure the maximum market value is achieved when disposing of assets;

- Prudential borrowing will only be made during the life of the MTFP after the production of a fully costed business case that demonstrates how the investment meets the Council's policy objectives, has exhausted all other external funding routes and delivers measurable improvement within a reasonable payback period;

- The Council will keep its internal borrowing under review and when appropriate will consider the potential to fix rates in the medium to long term to manage the risk and potential financial impact of interest rate increases. Consideration will also be given to whether the most appropriate funding mechanism is to fully utilise cash balances and undertake short-term borrowing to meet cash flow requirements. The Council continues to consult specialist advice to keep this under review.

With LGR on the horizon, the planning of debt finances leads to ongoing commitments for the new entity. At present there is a case to undertake cheaper short term financing solutions, leaving the new entity free to re-finance as it deems appropriate in due course.

4.2 These are all underpinned by a culture of Budget Ownership across all services.

5.0 Summary of the likely changes to Local Government Funding relevant to the General Fund

5.1 There are significant and wide ranging changes likely for all local authority funding streams. The main areas of change are:

5.2 Core Government Funding

The formulae used to distribute the funding for the last 20+ years is being replaced through a review called the "Fair Funding Review 2.0" (first announced in 2016). The formulae will be simplified and the underlying base data updated, leading to very different outcomes for individual authorities. Furthermore, political decisions to prioritise certain indicators, such as deprivation over sparsity give rise to significant swings in funding from one geographical area to another – something known as resource equalisation.

5.3 Business Rates

The biggest impact for the Council will be the changes announced for Business Rates. Again, many of these changes are the first since the current scheme's introduction in 2013/14. In summary, the main changes are:

- The revaluation of the local business properties by the Valuation Office – leading to changes in the charge placed on local businesses;
- The introduction of 5 new multipliers (replacing 2 currently);
- The removal / reduction in the application of reliefs, such as that awarded to Retail, Hospitality and Leisure, as the new multipliers will now incorporate that adjustment;
- The reset of the funding baseline from that used within the current funding settlement, which was based upon 2010/11 and 2011/12. This is designed "to move business rates income retained by local authorities to the places which need it most".

None of these values will be known until the autumn, with the levels of the multipliers and reliefs expected in the Chancellor's Autumn Budget, the date for which is yet to be announced.

The clear outcomes of these changes are:

1. Places more responsibility on local authorities to administer the more complex scheme and increases their risk of non-collection;
2. Shifts funding from those that have most increased the business rates baseline – whether through council led initiatives, or simply through movements in valuations.

5.4 Council Tax

Perhaps the area with the least change, which remains unchanged from its introduction in 1993. There is no change to the scheme itself, or the prescribed level of the referendum limit. However, the change here is in how councils can chase and enforce outstanding debt. Government proposals include extending the timeframe before a council can enforce, and softens its enforcement capability. The outcome of this is likely to be that less council tax will ultimately be collected, reducing the Council's funding. Also changes to payment periods will have treasury cash flow implications.

5.5 Extended Producer Responsibility (EPR)

The EPR Grant was introduced late in the budget process for 2025/26. The indicative allocation of £927k was fully earmarked in the budget to set it aside to contribute to the remodelling works planned at the waste depot. Subsequently this indicative allocation has increased to £1,438k reflecting the increase in recycling rates secured after the successful implementation of Bin-It 123. Government have indicated that similar levels of funding should be available in future years, albeit that as producers reduce the volume of packaging, the grant received will fall. Therefore a prudent assumption of £1,000k is included within the MTFP.

5.6 Food Waste

Similarly, there is potential funding available to help meet the cost of weekly food collection from 2026/27. It is considered "potential" as this funding has been targeted to those authorities that have not yet moved to weekly collection. We consider this grossly unfair as our local tax payers have funded this move and therefore we assume that all authorities will be treated fairly and all receive a share of this funding in the future, hence the inclusion of £250k per annum in the MTFP.

5.7 Wider reforms are also being considered. It still remains unclear how some of the incentive funding schemes such as New Homes Bonus and Business Rates will be refocused and how some of the new proposed changes will be offset by New Burdens funding. It is further assumed that the number of separate grants available (largely through competitive bidding processes) will reduce.

5.8 It is expected (and hoped) that over and above all of these changes will be a scheme of transitional support. Currently the Government have indicated that the movement from the current formulae will be implemented across the 3-years of the settlement ($^1/_3, ^2/_3, ^3/_3$). In addition, the cash impact of the change will

also be “smoothed” across the 3 years (100%, 0%, 0%) – meaning there will likely be a “big bang” in 2026/27, and then funding will be frozen for the following 2 years. It is not clear if full transition to the new funding mechanisms will occur within the 3-year settlement.

5.9 With any significant changes to funding streams, there would normally be a level of transitional support to smooth the impact over time. Should the Council be one of those c50 authorities targeted for the largest cuts in funding this will be especially relevant, particularly in respect to business rates where we have seen significant growth in our funding.

6.0 Summary of the Medium Term Financial Plan

6.1 As outlined above, the MTFP takes into consideration the current financial position against the 2025/26 base budget. The Qtr. 1 forecast indicated an over spend of £232k on the General Fund, indicating that although services generally are managing their budgets well, they are feeling pressure.

6.2 This is added to the assumed inflationary pressure, currently forecast to be c£600k plus relatively minor movements in Non-Service budgets.

6.3 As there is not clarity on the potential funding, three potential scenarios have been modelled based upon mooted outcomes from the Fair Funding Review 2.0, to give a guide to the potential scale of the funding shortfall.

6.4 This indicates the overall forecast shortfall for 2026/27 ranges between c£900k to c£3,300k, as shown in **Appendix 1** and summarised in the table below:

Table 1 – MTFP 2026/27 General Fund Assumptions Summary

		Assumption 1a	Assumption 1b	Assumption 1c
2025/26		**2026/27**	**2026/27**	**2026/27**
£000		**£000**	**£000**	**£000**
15,071	Expenditure	15,602	15,602	15,602
(15,071)	Funding	(14,683)	(14,756)	(12,252)
0	**Annual Shortfall**	**919**	**846**	**3,350**

Note, if the shortfall is not mitigated by ongoing savings, the shortfall remains in future years; in essence the problem has only been bumped into the future.

6.5 This is clearly a challenge built upon a number of assumptions, caveats, decisions based upon external advice and the most up to date information available at this time. Clearly, any major variations in these assumptions would require a fundamental review of the Council’s MTFP and would be reported back to Cabinet and the wider Membership as soon as practical, coupled with proposed courses of action that could be implemented.

6.6 The Council has a legal requirement to set a balance budget and needs to ensure its overall costs are affordable i.e. they can be funded through income and planned short-term use of reserves. Members therefore need to take the necessary decisions and actions to manage net spending within affordable limits.

7.0 Approach to closing the Budget Gap

7.1 Many of the issues, assumptions and sensitivity of items included within the MTFP are complex, often inter-related and will undoubtedly be subject to variation and ultimately fundamental review depending on the levels of future funding reductions. However, strategic decisions have been ongoing to reduce the current and future operational costs.

7.2 In order to reduce the forecast deficit the Council will strive to constantly manage its costs and revenues by:

- Ensure fees/charges are revisited regularly and that the Council are charging appropriately for all items possible;
- A continued reduction of discretionary service and employee costs (via vacancy management) – which may incur short term upfront costs;
- Investigation of spend to save projects;
- Maximise procurement efficiencies;
- Examine different ways of delivering services to reduce costs;
- Continued benchmarking and learning from best practice;
- Consideration of growing the residential and commercial property base to align delivery with Government funding priorities.

Some of the savings strategy shown above are now less likely to be pursued due to the current and ongoing focus on LGR.

7.3 Part of that saving could come from increasing income from Service Fees and Charges. Following a full review last year, many services now have delegated authority to increase fees in line with inflation. The working assumption is that this will be done.

7.4 During the summer, Leadership Team and services have been reviewing a range of budget options that could be considered in order to help mitigate that remaining budget shortfall across this MTFP, with a particular focus on 2026/27. In putting forward the options, officers have applied a risk level to them based upon Red, Amber, Green as follows:

Red – indicates the saving could be taken, but there are higher risks/ implications associated with it and therefore officers would not recommend it;
Amber – indicates the saving could be taken, but there are risks and implications associated that members need to be aware of / accept;

Green – indicates a saving that is recommended by officers.

7.5 **Appendix 2** provides a list of the budget pressures emerging. These are not currently included within the MTFP forecast. Clearly officers will look to mitigate these as far as possible, but inevitably the majority of these will need to be included within the 2026/27 Budget, adding further pressure to identify deliverable savings.

7.6 **Appendix 3** provides a list of the potential savings that have been identified relating to this PDG. Members are asked to consider these and recommend to cabinet those they believe should be progressed. A full list of all savings identified is also included with Appendix 4 for context.

7.6.1 There are a number of savings proposals that have options depending on the scale of the change agreed. These options are largely mutually exclusive, i.e. is it is one or the other, not both. Therefore the appendix assumes Option 1 (generally green) will be considered and options 2 (and 3 where relevant) are included separately should members wish to agree to stretch the proposal.

7.6.2 Potential savings could be made in certain areas linked to de-scoping or downsizing activity, should turnover allow for a natural wastage approach in these identified areas. Organisation-wide turnover should allow for a realisation of some of these savings over the coming months and years. However, they are categorised as amber/red to denote that these are not immediately realisable (amber) or would not be recommended due to the severe negative impact on service delivery (red). This aligns with the early steer from the administration around prioritising and protecting service delivery to customers alongside a desire to ensure no redundancies are required given the opportunities to manage workforce resource effectively through targeted vacancy and turnover management. The combined value of such options indicates the level of Vacancy Target that could be included within the budget.

7.7 Given the scale of the forecast shortfall, all possible options to increase income or reduce costs must be considered. Members will appreciate that all budget options will require political support and therefore if some suggestions are deemed to be unacceptable then other savings will need to be proposed. Members should indicate where these alternatives should be sought.

8.0 Balances and Reserves

8.1 The Council should look to match on-going spending plans to available in-year resources. Any use of reserves to support ongoing expenditure only delays the requirement for the identification and implementation of a sustainable saving.

8.2 Therefore this plan does not include any utilisation of these reserves. However, with the scale of the deficit, it is conceivable that some utilisation may be necessary. If so, this would normally be on the basis that the reserve is

replenished by the end of the MTFP period. Due to LGR, this is not likely to be possible and therefore will remain below the recommended level for the remainder of the Council's existence.

8.3 The overall level of balances transferring to the new entity will be reduced and would therefore clearly have financial consequences for the inheriting organisation.

9.0 Conclusion

9.1 The MTFP will continue to be updated to ensure it is a live document. It is subject to amendment and review by Leadership Team and Members and will provide a clear guide prior to commencing the annual budget setting process in future years.

9.2 2026/27 onwards is the most uncertain time from a government funding perspective coupled with the implementation and delivery of LGR is resulting in the most challenging budget planning process. These facts will result in many councils, including our own, having to rely on the temporary use of reserves until some urgently needed government clarity is forthcoming.

9.3 Any finalised clarity regarding our government funding will not be provided until late November / early December which will result in urgent update papers from the S151 Officer indicating our final position for 2026/27 and the subsequent two financial years.

Financial Implications

By undertaking regular reviews of the MTFP the Council can ensure that its Corporate Plan priorities are affordable. The implications of the budget gap are set out within the paper. Many areas require greater clarity, particularly around national funding and possible changes to Government Policy. Therefore a number of key assumptions underpin the reported position, which will be refined as greater clarity is received through the budget setting process.

Legal Implications

None directly arising from this report, although there is a legal obligation to balance the budget. There are legal implications arising from any future consequential decisions to change service provision, but these would be assessed at the time.

Risk Assessment

The MTFP makes a number of financial assumptions based on a sensible/prudent approach, taking account of the most up to date professional advice that is available. However, many of these assumptions are open to challenge.

Impact on Climate Change

The allocation of resources will impact upon the Council's ability to implement/fund new activities linked to climate change, as the MTFP sets the broad budgetary framework for the Council over the coming years. However, some provision has already been included in the base budget and further evaluation/consideration will be made as the draft budget passes through the PDGs over the next few months. Significant investment is currently forecast within the Capital Programme, however this will be dependent upon full options appraisals and levels of Grant funding available.

Equalities Impact Assessment

No implications arising from this report.

Relationship to Corporate Plan

The Medium Term Financial Plan (MTFP) sets out the financial resources available to deliver the Council's ongoing Corporate Plan priorities.

Section 3 – Statutory Officer sign-off/mandatory checks

Statutory Officer: Andrew Jarrett
Agreed by or on behalf of the Section 151 Officer
Date: 22 August 2025

Statutory Officer: Maria De Leiburne
Agreed on behalf of the Monitoring Officer
Date: 22 August 2025

Chief Officer: Stephen Walford
Agreed by or on behalf of the Chief Executive/Corporate Director
Date: 10 September 2025

Performance and risk: Dr Stephen Carr
Agreed on behalf of the Corporate Performance & Improvement Manager
Date: 22 August 2025

Cabinet member notified: Yes

Section 4 - Contact Details and Background Papers

Contact: Andrew Jarrett – Deputy Chief Executive (S151)
Email: ajarrett@middevon.gov.uk
Telephone: 01884 234242

Background papers:

- 2025/26 Budget
- 2025/26 Qtr. 1 Budget Monitor
- 2025 MTFP (September Cabinet)

Appendix 1

The Table below gives an overall summary of the Council's General Fund MTFP position (which includes a wide range of assumptions).

MTFP General Fund Summary – assumed worst position

2025/26 £'000		Notes	2026/27 £'000	2027/28 £'000	2028/29 £'000
16,284	**Net Direct Cost of Services**	1, 2	**16,973**	**17,692**	**18,441**
(2,050)	Net recharge to HRA		(2,112)	(2,175)	(2,240)
857	Provision for Repayment of Borrowing	3	1,021	1,249	1,294
15,091	**Net Service Costs**		**15,882**	**16,766**	**17,495**
(481)	Net Interest Costs/(Receipts)	4	(280)	(100)	(50)
462	Net Transfers to/(from) Earmarked Reserves	5	0	0	0
15,071	**Total Budget Requirement**		**15,602**	**16,666**	**17,445**
	Funded By:				
(5,079)	Retained Business Rates		0	0	0
(7,472)	Council Tax		0	0	0
(140)	Revenue Support Grant		0	0	0
(35)	Domestic Abuse Safe Accommodation Grant		0	0	0
(57)	Recovery Grant		0	0	0
(27)	Employer National Insurance Contributions Grant		0	0	0
(740)	Funding Floor		0	0	0
(498)	New Homes Bonus		0	0	0
0	New Core Funding Assumption	6	(11,002)	(10,702)	(10,402)
(927)	Extended Producer Responsibility Grant	1, 7	(1,000)	(1,000)	(1,000)
0	New Weekly Food Waste Collection Grant 5	8	(250)	(250)	(250)
(15,071)	**Total Funding**		**(12,252)**	**(11,952)**	**(11,652)**
0	**Annual Gap – Increase/(Decrease) In-year**		**3,350**	**4,714**	**5,793**
0	**Cumulative Gap**		**3,350**	**7,764**	**13,257**

The above figures are based on business as usual with no remedial management intervention. So is very much the most prudent worst case scenario, prior to any offsetting action.

Notes:

1. The Extended Producer Responsibility (EPR) Grant is currently assumed to be a direct grant. For illustration purposes, this has been stripped out of the Direct Service cost and shown separately under funding.
2. This includes the assumed inflationary pressure.
3. The Provision for repayment of borrowing incorporates the financial implications of the current Capital Programme.
4. The reduction in Net Interest Costs/(Receipts) reflects a prudent assumption of the interest earnt on balances held. The annual falls as balances held are reducing to fund the capital programme, plus interest rates are falling.
5. Net Transfers to/(from) Earmarked Reserves reflects assumed contributions to, or drawdowns from reserves. At the outset, it is prudent that the working assumption is that reserves are not required.
6. For illustration purposes, all core funding has been included within a single line – see Table 1c within the covering report. In reality, Council Tax will reflect our locally calculated figure, not that assumed by Government. It is assumed that this will also be relevant for Business Rates. A prudent assumption

of a reduction in core funding of £300k occurs in years 2027/28 and 2028/29 – although this could be protected by transitional grant.

7. The new Extended Producer Responsibility Grant sits outside of the Settlement. The indicative allocation for 2025/26 was £927k, however recently the Government have increased this to £1,438k. A prudent assumption of £1,000k has been made for future years. Note, as producers decrease the volume of packaging, the value of this grant will also fall.
8. This is a broad assumption that MDDC will qualify for this grant funding, and a high level assumption of the funding we might receive. Note the costs of delivering weekly food collect far exceed this assumed level of funding.

2025/26 - 2027/28 Headline Pressures

					2026/27			2027/28			2028/29		
Service	**Cabinet / Policy Development Group**	**Budget Holder**	**Cost Centre**	**BRIEF Saving Description (including risks of delivery)**	**Low Risk (£k)**	**Medium Risk (£k)**	**High Risk (£k)**	**Low Risk (£k)**	**Medium Risk (£k)**	**High Risk (£k)**	**Low Risk (£k)**	**Medium Risk (£k)**	**High Risk (£k)**
Finance Leasing costs	Cabinet	Paul Deal	CR210?	Likely increase in financing lease charges due to increase in numbers of vehicles leased	£50								
Property	Cabinet	Paul Deal	PS950	Option 1 Increase budget within Climate Change - originally planned for consultancy, funding bid completion, grant schemes or increased officer time			£100						
Finance	Cabinet	Paul Deal	FP100	Revise Budget to reflect employee joining the pension scheme	£11								
Finance	Cabinet	Paul Deal	IE290	Reduced investment returns as rates and cash balances reduce	£300			£100					
Property	Economy & Assets	Paul Deal	PS810	Increase budget for contract cleaning in line with current costs	£10								
Property	Economy & Assets	Paul Deal	PS991	Amend Lease income to reflect current tenant leases	£20								
Property	Economy & Assets	Paul Deal	PS991	Amend Cemetery income to reflect current levels	£10								
Property	Economy & Assets	Paul Deal	PS810	Amend Lease income to reflect current tenant leases	£15								
Property	Economy & Assets	Paul Deal	PS880	Amend Bus Station income to reflect current income levels	£10								
Property	Economy & Assets	Paul Deal	OS460	Failure to achieve full assumed financial contribution or transfer of assets is secured with some of all of the major town and parish councils		£50							
Public Health & Licensing	Community, People & Equalities / Homes	Simon Newcombe	PH733 / PH740	Additional staffing required within Public Health & Licensing (x2 FTE's) to deal with minimum statutory service levels	£91								
GF Housing Options	Homes	Simon Newcombe	PH320	Anticipated reduction in HPG income received in 2026/27 due to a change to formula calculation - Not expected to be known until Dec 25/Jan 26	£25								
People Services	Cabinet	James Hamblin	HR100	Payroll & HR System Ongoing annual costs	£11								
Development Management	Planning, Environment & Sustainability	John Hammond	PR200	Reduced S106 Monitoring fees - Budget currently at £51k	£25								
Development Management	Planning, Environment & Sustainability	John Hammond	PR225	Waiting on Govt decision on J28. assume 50% of costs	£40								
Forward Planning	Planning, Environment & Sustainability	Tristan Peat	PR600	Additional agency costs if unable to recruit to perm posts	£70								
Forward Planning	Planning, Environment & Sustainability	Tristan Peat	PR200	Increased planning appeals due to local plan		£100							
Communications	Cabinet	Lisa Lewis	CS200	Increase hours previously agreed	£10								
Revenues and Benefits	Cabinet	Fiona Keyes	RB100	Granicus additional software	£14								
Revenues and Benefits	Cabinet	Fiona Keyes	RB100	Council Tax disregard. S13A and Ukraine	£80								
Revenues and Benefits	Cabinet	Fiona Keyes	RB200	Band G business rates specialist Possible use of EMR (EQ787) to offset	£48								
Revenues and Benefits	Cabinet	Fiona Keyes	RB100 / 200 / 300	MOU change required for NEC to go on the Cloud (encryption)	£10								
Revenues and Benefits	Cabinet	Fiona Keyes	Collection Fund	Possible reduction in Council Tax collection due to softening of enforcement / increase in staffing required to drive up collection rate	??								
Street Scene - Waste	Service Delivery & Continuous Improvement	Darren Beer / Matthew Page	WS700	DCC Shared Savings funding (Budget for 2025-26 £450k) - Shared Savings cease to be paid after 2025/26.	£450								
Street Scene - Recycling	Service Delivery & Continuous Improvement	Darren Beer / Matthew Page	WS725	Dry recycling material income (2025-26 £636.5k). Actual for 2024-25 £600k - Very volatile in terms of income per tonne. Assumed possible 10% reduction in income			£60						
Street Scene - Recycling	Service Delivery & Continuous Improvement	Darren Beer / Matthew Page	WS725	Recycling Credit funding (Budget 2025-26 £566k) - For 2026-27 this has been reduced by £1 per tonne from £72.72 to £71.83 inline with pEPR, therefore a reduction £7k projected. Actual 2024-25 £474k.	£7								
Street Scene	Service Delivery & Continuous Improvement	Darren Beer / Matthew Page	Street Scene Services 3404/3405	Option 3: Projection on fuel spending. Budgeted 2025-26 £471.5k @ £1.25 per litre, currently £1.08 per litre. Projection of pressure is budgeted at £1.35. Prices can fluctuate dependent on external factors. (This only includes Street Scene services)		£38							
Street Scene - Waste	Service Delivery & Continuous Improvement	Darren Beer / Matthew Page	WS700	Impact of the Emission Trading Scheme - 11500 tonnes of waste 2024-25 at current government estimate of £49 per tonne.									£500
					£1,307	**£188**	**£160**	**£100**	**£0**	**£0**	**£0**	**£0**	**£500**

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2025/26 - 2027/28 Headline Savings Options

Savings including Option 1

					2026/27			2027/28			2028/29		
Development Management	Planning, Environment & Sustainability	John Hammond	PR200 7254	Planning Performance Agreements - increase income from £20,000 - £40,000 for 2025/26. Note the use of PPA's should refect the service looking to acquire addiitonal capacity resource to deal with increased demands. As such, an increase in PPA income should also reflect an increase in consultants comissioned to act on new applications. Note use of PPA likely to increase because of (i) HLS and (ii) Familiarity with process	(£20)			(£10)			(£10)		
Development Management	Planning, Environment & Sustainability	John Hammond	PR200 7201	Fees & Charges - Increase in national fees for particular application types. The target of £835,000 for 2024/25 was not achieved by reason of national trends resulting in the submission of fewer applications. MHCLG introduced new fees for a number of application types which result in high volume submissions, which, based upon the 2024/25 submissions would increase actual (rather than target) income by @ £100,000		(£50)							
Development Management	Planning, Environment & Sustainability	John Hammond	PR200 7201	7201 - Fees & Charges Likely increase if applications for housing. The target of £835,000 for 2024/25 was not achieved by reason of national trends resulting in the submission of fewer applications. As MDDC no longer has a sufficient housing supply it is likely that we will receive speculative applications for housing development until a new Local Plan is put in place. Combined with line 8 above fees should increase compared to recent levels.		(£50)							
Forward Planning	Planning, Environment & Sustainability	Tristan Peat	PR600 4701	Grants £10k SLA with the Devon Community Housing Hub to undertake parish based housing needs surveys for planning purposes and to support Community Land Trusts wishing to bring forward local housing schemes. The Council is presently unable to undertake local housing needs surveys in house and is not aware of a suitable alternative provider. There may be potential to use funds from S106 agreements for the provision of affordable housing instead to pay for part / all of the SLA with the Devon Community Housing Hub subject to this being CIL regulation 122 compliant.			(£10)						
					(£20)	**(£100)**	**(£10)**	**(£10)**	**£0**	**£0**	**(£10)**	**£0**	**£0**

Options 2 and 3 - to stretch Option 1 further.

Service	Cabinet / Policy Development Group	Budget Holder	Cost Centre	BRIEF Saving Description (including risks of delivery)	Low Risk (£k)	Medium Risk (£k)	High Risk (£k)	Low Risk (£k)	Medium Risk (£k)	High Risk (£k)	Low Risk (£k)	Medium Risk (£k)	High Risk (£k)
Property	Planning, Environment & Sustainability	Paul Deal	PS950	Option 2 Reduce budget within Climate Change - originally planned for consultancy, funding bid completion, grant schemes or increased officer time. Note Option 1 is a proposal to further increase this budget.			(£100)						
					£0	**(£387)**	**(£611)**	**£0**	**(£22)**	**(£33)**	**£0**	**(£2)**	**(£3)**

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2025/26 - 2027/28 Headline Savings Options

Savings including Option 1

Service	Cabinet / Policy Development Group	Budget Holder	Cost Centre	BRIEF Saving Description (including risks of delivery)	2026/27 Low Risk (£k)	2026/27 Medium Risk (£k)	2026/27 High Risk (£k)	2027/28 Low Risk (£k)	2027/28 Medium Risk (£k)	2027/28 High Risk (£k)	2028/29 Low Risk (£k)	2028/29 Medium Risk (£k)	2028/29 High Risk (£k)
All Services	Cabinet	Paul Deal	Account codes 2301 / 2304	Saving estimation on Utilities spend		(£100)							
All Services	Cabinet	Paul Deal	Account codes 2501	Saving estimation on Business Rates on MDDC Property - subject to revaluation and changes to overall scheme			(£50)						
All Services	Cabinet	Paul Deal	All	Potential to free up minor Earmarked Reserves through reprioritisation of funds		(£100)							
All Services	Cabinet	Paul Deal	All	Potential further increase in Council Tax income above current assumptions (e.g. a combination of further increase Band D charge, additional growth in Taxbase and improvement in collection rate)		(£150)							
All Services	Cabinet	Paul Deal	All	Likely reduction in capital financing charge due to level of slippage in 2024/25 Capital Programme	(£50)								
Property	Economy & Assets	Paul Deal	RS140 / RS150	Inclusion of new income budget for Renewable Heat Initiative (RHI) following end of previous contract	(£30)								
Property	Economy & Assets	Paul Deal	PS810	Lease more space commercially within Phoenix House (include recharges). Clarity required on requirements for PH, flexibility in changing accommodation, hybrid working etc			(£50)						
Property	Community, People & Equalities	Paul Deal	PS200	CCTV Saving achieved through contract extension - subject to continued agreement with Town Council		(£10)							
Property	Economy & Assets	Paul Deal	PS992	Refresh out of date leases - dependent upon market conditions at the time, income might reduce, might push some tenants out			(£10)						
Property	Economy & Assets	Paul Deal	PS160	Potential reduction in maintenance spend - high risk as dependent upon condition survey results and requirements			(£100)						
GF Housing Options	Homes	Simon Newcombe	PH320	Reduction in TA hotel and B&B budget costs due to uplift in GF owned accommodation	(£25)								
Licensing	Community, People & Equalities	Simon Newcombe	PH740	Uplift in licensing fee income for 2026/27	(£10)								
GF Housing Options	Homes	Simon Newcombe	PH320	Further reduction in TA hotel and B&B costs due to better 16-18yr homelessness support (potential Young Devon contract)	(£10)								
GF Housing Options	Homes	Simon Newcombe	PH320	Increase in licence fee income from TA rents - reflects 2024/25 outturn and trend	(£30)								
GF Housing Options & Public Health	Community, People & Equalities / Homes	Simon Newcombe	CR380 / PH320 / PH733	Contribution from the Homes for Ukraine pot towards staffing costs within Public Health & GF Housing	(£60)								
People Services	Cabinet	James Hamblin	HR100	Mgt of Staff Survey in-house instead of outsourced (alternate years)				(£10)					
Development Management	Planning, Environment & Sustainability	John Hammond	PR200 7254	Planning Performance Agreements - increase income from £20,000 - £40,000 for 2025/26. Note the use of PPA's should refect the service looking to acquire addiitonal capacity resource to deal with increased demands. As such, an increase in PPA income should also reflect an increase in consultants comissioned to act on new applications. Note use of PPA likely to increase because of (i) HLS and (ii) Familiarity with process	(£20)			(£10)			(£10)		
Development Management	Planning, Environment & Sustainability	John Hammond	PR200 7201	Fees & Charges - Increase in national fees for particular application types. The target of £835,000 for 2024/25 was not achieved by reason of national trends resulting in the submission of fewer applications. MHCLG introduced new fees for a number of application types which result in high volume submissions, which, based upon the 2024/25 submissions would increase actual (rather than target) income by @ £100,000		(£50)							
Development Management	Planning, Environment & Sustainability	John Hammond	PR200 7201	7201 - Fees & Charges Likely increase if applications for housing. The target of £835,000 for 2024/25 was not achieved by reason of national trends resulting in the submission of fewer applications. As MDDC no longer has a sufficient housing supply it is likely that we will receive speculative applications for housing development until a new Local Plan is put in place. Combined with line 8 above fees should increase compared to recent levels.		(£50)							
Growth and Economic Development	Community, People & Equalities	Adrian Welsh	CD200 4701	Cease Communiity Development grants.			(£120)						
Growth and Economic Development	Economy & Assets	Adrian Welsh	PR400 4701	Cease Grants		(£30)							
Growth and Economic Development	Economy & Assets	Adrian Welsh	PR400 4442	Reduce Local projects initiatives by 50%		(£25)							
Forward Planning	Planning, Environment & Sustainability	Tristan Peat	PR600 4701	Grants £10k SLA with the Devon Community Housing Hub to undertake parish based housing needs surveys for planning purposes and to support Community Land Trusts wishing to bring forward local housing schemes. The Council is presently unable to undertake local housing needs surveys in house and is not aware of a suitable alternative provider. There may be potential to use funds from S106 agreements for the provision of affordable housing instead to pay for part / all of the SLA with the Devon Community Housing Hub subject to this being CIL regulation 122 compliant.			(£10)						
ICT	Cabinet	Brian Trebilcock	IT700-4106	Reduction in cost of Veeam Licences, as licenced differently RISK: * none	(£5)								

Service	Cabinet / Policy Development Group	Budget Holder	Cost Centre	BRIEF Saving Description (including risks of delivery)	2026/27			2027/28			2028/29		
ICT	Cabinet	Brian Trebilcock	IT400-4103	Reduce budget for Computer Hardware (Operational) RISK: * insufficient funds to replace computer equipment in-year. * Extending the use-life of End Users Devices * Possible security risk if firmware and software updates are not available		(£15)			£0			£0	
ICT	Cabinet	Brian Trebilcock	IT400-4110	Reduction in Budget for Equipment Maintenance RISK: * Unsupported hardware, increased risk of failure due to age, * Security, if patches and updates not available.		(£10)			£0			£0	
ICT	Cabinet	Brian Trebilcock	IT200-4103 (EMR755)	Reduce budget for Computer Hardware Currently £100k per year (£120k for 26-27) - reduce this request over next three years by £40K to £60 per year. RISK: * insufficient funds to replace computer equipment in-year. * Extending the use-life of End Users Devices - 4 years to 5 years * Possible security risk if firmware and software updates are not available		(£60)							
Revenues and Benefits	Cabinet	Fiona Keyes	RB100	Encouraging take-up of council tax e-billing to save on printing and postage costs Work in progress hard line approach required whilst it is the right thing to do members may not like it		(£25)							
Revenues and Benefits	Cabinet	Fiona Keyes	RB340	LHA assistance scheme. Budget not fully used since 2018	(£7)								
Leisure Income	Service Delivery & Continuous Improvement	Andy Mackie	RS140	Tennis courts conversion to include Padel courts increase income circa £50k		(£50)							
Leisure Income	Service Delivery & Continuous Improvement	Andy Mackie	RS150	Tennis court upgrade and convert 1-2 for padel, increase income circa £10k		(£10)							
Leisure income	Service Delivery & Continuous Improvement	Andy Mackie	RS140	Pool inflatable fun sessions circa £10k uplift in income pa	(£10)								
Leisure income	Service Delivery & Continuous Improvement	Andy Mackie	RS140	Stock resale potential	(£5)								
Leisure Income	Service Delivery & Continuous Improvement	Andy Mackie	RS140	New Softplay and Café income with upfront investment required (potential of £60k - £100k)						(£60)			
Street Scene - Waste	Service Delivery & Continuous Improvement	Darren Beer / Matthew Page	WS700	Option 1: Projection on Garden Waste income from residents (Budget 2025-26 £850k) - Currently customers are charged £72/£61, 12150 subscribed and has plateaued in 2024-25. Freeze prices	£0								
Street Scene - Trade Waste	Service Delivery & Continuous Improvement	Darren Beer / Matthew Page	WS710	Option 1: Projection on Trade Waste income from customers (Budget for 2025-26 £1056k). Increase of 3%	(£32)								
Street Scene - Waste	Service Delivery & Continuous Improvement	Darren Beer / Matthew Page	WS700	Option 1: Projection in Bulky Waste income from residents (Budget for 2025-26 £58.5k) - Adding 3% for each additional item	(£2)								
Street Scene - Car Parks	Service Delivery & Continuous Improvement	Darren Beer / Matthew Page	CP520/540	Option 1: Projection on Parking Income from customers (Budget for 2025-26 £855k) - Increase in 5% advised	(£44)								
Street Scene - Car Parks	Service Delivery & Continuous Improvement	Darren Beer / Matthew Page	CP520/541	Option 1: Projection on Parking Permits from customers (Budget 2025-26 £219k) Actual for 2024-25 £30k under budget. Increases of 5%	(£11)								
Street Scene - Recycling	Service Delivery & Continuous Improvement	Darren Beer / Matthew Page	WS725	pEPR funding (Provisional 2025-26 £1380k. Guaranteed £927k) - Projection dependant on recycling figures at 85%, 95% and 105%. This will be impacted in 2027-28 when DRS is introduced along with soft plastic recycling. £200k reflects a potential increase in grant over and above current assumption.		(£200)							
Street Scene	Service Delivery & Continuous Improvement	Darren Beer / Matthew Page	Street Scene Services 3404/3405	Option 1: Projection on fuel spending. Budgeted 2025-26 £471.5k @ £1.25 per litre, currently £1.08 per litre. Prices can fluctuate dependent on external factors. (This only includes Street Scene services)	£0								
All Services	Cabinet	Stephen Walford	All	Within the base budget there is already £282k Vacancy Target included. This assumption assumes we can increase Vacancy Savings Target from amolgamation of specific service proposals impacting upon staffing levels. Option 1 - 10% of Green / Amber / Red of the total service proposals affecting staffing levels.	(£91)			(£11)			(£1)		
					(£441)	**(£885)**	**(£340)**	**(£31)**	**£0**	**(£60)**	**(£11)**	**£0**	**£0**

Options 2 and 3 - to stretch Option 1 further.

Service	Cabinet / Policy Development Group	Budget Holder	Cost Centre	BRIEF Saving Description (including risks of delivery)	Low Risk (£k)	Medium Risk (£k)	High Risk (£k)	Low Risk (£k)	Medium Risk (£k)	High Risk (£k)	Low Risk (£k)	Medium Risk (£k)	High Risk (£k)
Property	Planning, Environment & Sustainability	Paul Deal	PS950	Option 2 Reduce budget within Climate Change - originally planned for consultancy, funding bid completion, grant schemes or increased officer time. Note Option 1 is a proposal to further increase this budget.			(£100)						
Street Scene - Waste	Service Delivery & Continuous Improvement	Darren Beer / Matthew Page	WS700	Option 2: Projection on Garden Waste income from residents (Budget 2025-26 £850k) - Currently customers are charged £72/£61, 12150 subscribed and has plateaued in 2024-25, Increase of 3% (£2)		(£25)							
Street Scene - Waste	Service Delivery & Continuous Improvement	Darren Beer / Matthew Page	WS700	Option 3: Projection on Garden Waste income from residents (Budget 2025-26 £850k) - Currently customers are charged £72/£61, 12150 subscribed and has plateaued in 2024-25. Increase of 5% (£3.50)			(£43)						
Street Scene - Trade Waste	Service Delivery & Continuous Improvement	Darren Beer / Matthew Page	WS710	Option 2: Projection on Trade Waste income from customers (Budget for 2025-26 £1056k). Increase of 5%		(£54)							
Street Scene - Trade Waste	Service Delivery & Continuous Improvement	Darren Beer / Matthew Page	WS710	Option 3: Projection on Trade Waste income from customers (Budget for 2025-26 £1056k). Increase of 8%			(£84)						
Street Scene - Waste	Service Delivery & Continuous Improvement	Darren Beer / Matthew Page	WS700	Option 2: Projection in Bulky Waste income from residents (Budget for 2025-26 £58.5k) - Adding 5% for each additional item		(£3)							
Street Scene - Waste	Service Delivery & Continuous Improvement	Darren Beer / Matthew Page	WS700	Option 3: Projection in Bulky Waste income from residents (Budget for 2025-26 £58.5k) - Adding 8% for each additional item.			(£5)						
Street Scene	Service Delivery & Continuous Improvement	Darren Beer / Matthew Page	Street Scene Services 3404/3405	Option 2: Projection on fuel spending. Budgeted 2025-26 £471.5k @ £1.25 per litre, currently £1.08 per litre. Projection of saving if reduced to £1.15. Prices can fluctuate dependent on external factors. (This only includes Street Scene services)		(£38)							
Street Scene - Car Parks	Service Delivery & Continuous Improvement	Darren Beer / Matthew Page	CP520/540	Option 2: Projection on Parking Income from customers (Budget for 2025-26 £855k) - Increase in 8%		(£69)							
Street Scene - Car Parks	Service Delivery & Continuous Improvement	Darren Beer / Matthew Page	CP520/540	Option 3: Projection on Parking Income from customers (Budget for 2025-26 £855k) - Increase in 10%			(£86)						
Street Scene - Car Parks	Service Delivery & Continuous Improvement	Darren Beer / Matthew Page	CP520/541	Option 2: Projection on Parking Permits from customers (Budget 2025-26 £219k) Actual for 2024-25 £30k under budget. Increases of 8%		(£18)							
Street Scene - Car Parks	Service Delivery & Continuous Improvement	Darren Beer / Matthew Page	CP520/541	Option 3: Projection on Parking Permits from customers (Budget 2025-26 £219k) Actual for 2024-25 £30k under budget. Increases of 10%			(£22)						
All Services	Cabinet	Stephen Walford	All	Within the base budget there is already £282k Vacancy Target included. This assumption assumes we can increase Vacancy Savings Target from amolgamation of specific service proposals impacting upon staffing levels. Option 2 - 20% of Green / Amber / Red of the total service proposals affecting staffing levels.		(£181)			(£22)			(£2)	
All Services	Cabinet	Stephen Walford	All	Within the base budget there is already £282k Vacancy Target included. This assumption assumes we can increase Vacancy Savings Target from amolgamation of specific service proposals impacting upon staffing levels. Option 3 - 30% of Green / Amber / Red of the total service proposals affecting staffing levels.			(£272)			(£33)			(£3)
					£0	(£387)	(£611)	£0	(£22)	(£33)	£0	(£2)	(£3)

Amalgomated Staffing Savings

Service	Cabinet / Policy Development Group	Budget Holder	Cost Centre	BRIEF Saving Description (including risks of delivery)	Low Risk (£k)	Medium Risk (£k)	High Risk (£k)	Low Risk (£k)	Medium Risk (£k)	High Risk (£k)	Low Risk (£k)	Medium Risk (£k)	High Risk (£k)
All Services	Cabinet	Stephen Walford	All	Within the base budget there is already £282k Vacancy Target included. This assumption assumes we can increase Vacancy Savings Target from amolgamation of specific service proposals impacting upon staffing levels. Option 1 - 10% of Green / Amber / Red of the total service proposals affecting staffing levels. Option 2 - 20% of Green / Amber / Red of the total service proposals affecting staffing levels. Option 3 - 30% of Green / Amber / Red of the total service proposals affecting staffing levels.	(£51)	(£441)	(£413)	£0	(£48)	(£63)	£0	£0	(£10)
					(£51)	(£441)	(£413)	£0	(£48)	(£63)	£0	£0	(£10)

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Report for:	**Planning, Environment and Sustainability Policy Development Group (PDG)**
Date of Meeting:	23 September 2025
Subject:	**Climate and Sustainability Update**
Cabinet Member:	Cllr Natasha Bradshaw - Cabinet Member for Environment and Climate Change.
Responsible Officer:	Jason Ball - Climate and Sustainability Specialist. Paul Deal - Head of Finance, Property and Climate Resilience.
Exempt:	None which are Exempt from publication under paragraph 3, Part 1 of Schedule 12A to the Local Government Act 1972 (as amended) as it contains information relating to the financial or business affairs of any particular person (including the authority holding that information)
Wards Affected:	All
Enclosures:	(none)

Section 1 – Summary and Recommendation(s)

To receive an update on the Climate and Sustainability Programme.

Recommendation(s):

1. **That the Planning, Environment and Sustainability Policy Development Group (PDG) notes and accepts this report as an update on the Council's Climate and Sustainability Programme, and progress on its response to the Climate Emergency.**

Section 2 – Report

1.0 Introduction

1.1 This report emphasises activity and progress updates for brevity.

1.2 The Council's environmental sustainability work can be split into: **corporate** activity related to its own assets and operations; and activities to enable and facilitate **community** actions across Mid Devon.

1.3 Climate change actions seek to address **mitigation** (reducing greenhouse emissions) and **adaptation** (resilience to climate change risks).

1.4 The Council's Climate Change Strategy 2024/28 aligns with the 2024/28 Corporate Plan (CP). An annual Climate Action Plan (CAP) aims to deliver corporate Net Zero at the soonest opportunity. Each PDG and team must manage their remit and operations with regard to climate adaptation and mitigation. We also work in partnership with local businesses, organisations, community groups and residents.

1.5 The Council participates in the Devon Climate Emergency partnership, is a signatory to the Devon Climate Emergency Pledge and endorsed the Devon Carbon Plan goal of net-zero emissions by 2050 at the latest.

1.6 The Climate and Sustainability (C&S) Specialist leads the development of the Council's C&S Programme, working with partners, all Councillors and colleagues and particularly with service leads, the Corporate Management Team and the Cabinet Member for Environment and Climate Change.

2.0 Performance

2.1 Corporate Plan Performance Indicators (PI) are reported to Cabinet quarterly (Scrutiny Committee every 6 months). Quarterly Performance Dashboards share data on e.g. emissions avoided by generating solar power. Notes on achievements also available online. (sustainablemiddevon.org.uk/our-plan)

2.2 The Council's Carbon Footprint

2.2.1 Annual carbon footprint (organisational inventory) reports are published on the Sustainable Mid Devon website. Emissions are measured in tonnes of carbon dioxide equivalent (tCO_2e). Reports since 2018/19 (baseline year) have been produced by the University of Exeter's Centre for Energy and the Environment (CEE) via the South West Energy and Environment Group (SWEEG). Analysis is based on BS EN ISO 14064-1 and the Greenhouse Gas Protocol.

2.2.2 The latest Carbon Footprint report for the 2024/25 financial year has been produced (Appendix 1, enclosed). Please refer to the Management Summary (page ii) and the charts in the Results section (pages 21 to 25 of the report). Notes below must be read in the context of the official report.

2.2.3 Net emissions for the 2024/25 financial year totalled 18,364 tCO_2e. This was 2% higher than the previous year.

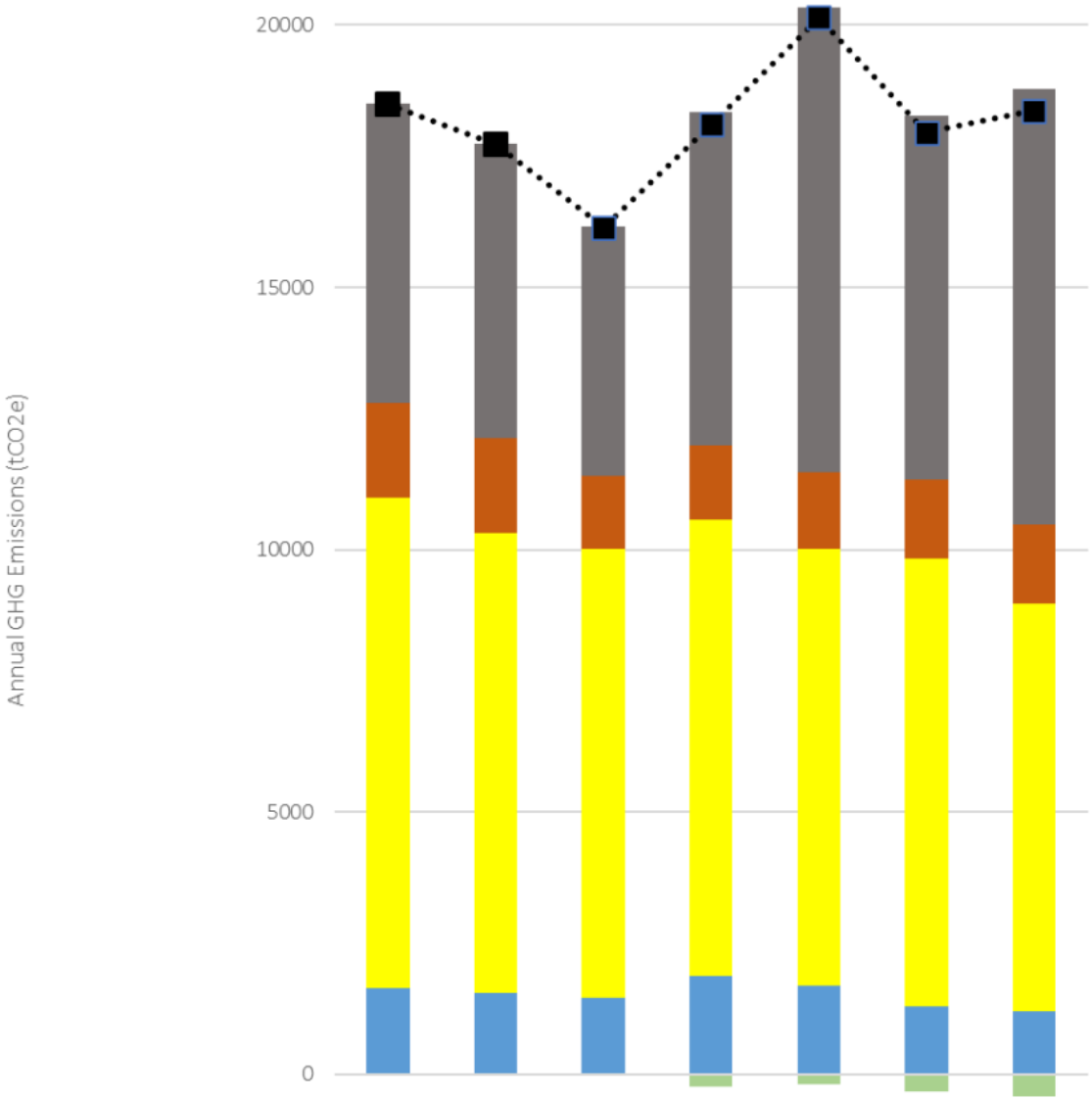
2.2.4 The chart and table for 'headline alternative categories' provides a useful overview of changes or trends in emissions for these categories, over time. (Figure 4.) Headlines from the latest changes as follows:

- Estimated emissions from the Procurement category **increased** by 1,370 tCO_2e compared to the previous year, mainly due to increased spend and revised emission factors.
- Transport: emissions remained about the same.
- Social Housing: the footprint **decreased** by 751 tCO_2e mainly due to a lower assumed energy consumption per dwelling.
- Buildings excluding housing: impact **reduced** by 113 tCO_2e. Decarbonised leisure centres stopped using gas during 2024/25.
- Offsets: **improved** by 29% - cutting an extra 95 tCO_2e. Decarbonised leisure centres used more electricity, and as the Council buys green power there is a carbon offset. The Council also exports some of its solar power.

2.2.5 Net emissions for elements in the Council's direct control (comprising Council Offices and Facilities; Transport; and Offsets) contributed just under 9% of the 2024/25 overall total footprint.

- The 1,589 tCO_2e figure for 2024/25 is circa **35**% **lower** than the 2,427 tCO_2e figure for the 2018/19 baseline year. (Almost 840 tCO_2e less.)
- Reductions in this emissions subset since 2018/19 came from Council Offices and Facilities (from 1,098 to 705 tCO_2e); and Offsets (from 0 to -420 tCO_2e).
- Since 2018/19 fleet impacts had hardly changed, although the Council now serves circa 2,500 more households (up from 35,650 to 38,150).

2.2.6 Below, Figure 4: Breakdown of emissions by headline alternative categories.



	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25
5. Offsets	0	-9	-8	-241	-181	-325	-420
4. Procurement	5703	5610	4754	6372	8842	6925	8295
3. Transport	1812	1818	1382	1400	1473	1515	1520
2. Social Housing	9326	8758	8547	8711	8319	8526	7775
1. Buildings (exc. housing)	1654	1554	1469	1865	1694	1307	1194
GRAND TOTAL (net)	18495	17732	16144	18108	20147	17948	18364

Figure 4: Breakdown of emissions by headline alternative categories

2.3 Table below - positive progress on the CAP at Q1 2025/26.

Actions, Activities, Projects	Emissions Cut, tCO_2e/year	**Q1** 25-26 Status	Progress %
Property Services (subtotal)	**218**		
Pannier Market LED fixtures and controls.	2	complete	100%
Exe Valley, additional solar car ports. **Now battery storage**.	37	behind	
Culm Valley, new ASHP, solar.	45	active	
Exe Valley gas CHP 70kW. (combined heat and power)	-50	active	
Solar Car Ports, Phoenix Lane multi storey.	146	emerging	5%
Building Management System project at Phoenix House.	38	emerging	5%
Fleet (subtotal)	**7**		
Replace 1 van	2	behind	
Replace 4 vans	5	active	
Housing (subtotal)	**135**		
Solid Fuel appliance removals from HRA Stock	50	active	32%
Whole house UPVC window replacements to HRA stock	15	active	40%
Internal Insulation upgrades, HRA stock	13	active	60%
Whole roof Replacement to HRA stock	7	active	50%
Renewable Heating installs, HRA stock	48	active	10%
LED lighting to Bathrooms in HRA stock	1	active	84%

3.0 Community and partnership activities

3.1 Climate Change Strategy themes:

- Vibrant Landscapes at the Heart of Devon
- Climate Resilient Communities
- Healthy Homes
- Green Growth and Bright Futures
- Sustainable Services and Spending

3.1.1 Recent engagement activities, in brief:

- A first informal Forum was held online for key stakeholders. Presentations included Dart Valley nature recovery (vibrant landscapes theme); ‘Connecting the Culm’ natural flood management and community engagement around climate adaptation (climate resilient communities theme); ECOE Advice home energy funding and advice (healthy homes theme).
- The Forum also announced that the Council will offer small grants to community groups taking action on climate and sustainability - funded by the

C&S budget - details to be confirmed. (We had also supported stakeholders on a lottery funding bid but this has not been realised.)

- The online forum and themed conversations attracted over 30 key community stakeholders - a broad mix from business owners, farmers, farming advisors, nature conservation volunteers and managers, to community funding enablers, planning policy campaigners, educators and youth workers.
- Meetings also held with community groups and champions to discuss potential: Dart Valley farmers; Sustainable Bradninch; Sustainable Crediton; Sustainable Tiverton; Tidcombe Fen; Uffculme Green Team.
- Community engagement and a presentation of the Climate Change Strategy at the *Connecting the Culm* 2025 Forum; at the Hemyock Parish Council; at the Sustainable Homes tenant event.
- Energy Boost Mid Devon - ECOE Advice at landlord networking event.
- Launched Green Enterprise Grants, handling expressions of interest.

3.1.2 Community engagement continues e.g.:

- Letting agent online workshop 18 September hosted by the Council with ECOE Advice, to cover energy efficiency, retrofit and tenant support.
- A new 'Connecting the Culm' community engagement project.
- Work to support and attend in-person events led by partners - Big Green Fair at Crediton 27 September; spring 2026 event TBC.

3.1.3 We continue to share and promote news, activities, projects, resources and funding via social media, the Let's Talk Mid Devon engagement platform and the Sustainable Mid Devon website (resources map updated).

3.2 Vibrant landscapes at the heart of Devon

3.2.1 Cabinet 05 August 2025 gave approval for Devon's Local Nature Recovery Strategy (LNRS) to go out to consultation - due in September - following recommendations from this PDG's special meeting 29 July 2025 and a briefing at Planning Policy and Advisory Group (PPAG) 16 June 2025.

3.2.2 Housing team work with residents to enhance biodiversity:

- Wildflower seeds sown in springtime at Townlands in Bradninch.
- Bug boxes to be installed at Townlands and Bray's Close.
- We will be planting a wildlife area in Sunningbrook Road and planting fruit trees at St Georges Court in the coming months.

3.3 Climate Resilient Communities

3.3.1 The Council will work in partnership with Blackdown Hills National Landscape to support a new 'Connecting the Culm' community engagement project around climate adaptation.

3.4 Healthy Homes

3.4.1 Energy Boost Mid Devon, a partnership project with charity ECOE Advice, launched in April. By the end of Q1 ECOE Advice had done 4 outreach events, dealt with 42 enquiries, made 13 home visits, and used £864 of the £15,000 Energy Efficiency Fund to help Mid Devon residents.

3.4.2 The Housing Initiatives Officer worked with DCC and other districts on a bid for the Warm Homes: Local Grant as part of the Devon consortium. Grant allocated to Mid Devon area: £472,500. Delivery deadline spring 2026.

3.4.3 By the end of 2025 the Council is on track to replace old stock with 48 new properties that achieve Net Zero energy performance. With demolitions completed, sites are in preparation at Bampton and Tiverton. This will achieve progress on the Climate Action Plan, ahead of schedule.

3.5 Green Growth and Bright Futures

3.5.1 Green Enterprise Grants. From numerous expressions of interest, by August we had invited 28 applicants to bid. The Decision Panel considered and approved grant offers to 2 bids; each is estimated to save at least 1 tCO_2e annually from their carbon footprint. Launched in May 2025, the scheme offers grants £500 to £5k for small and medium sized enterprises (SMEs) to drive local investment to help reduce emissions in Mid Devon.

3.5.2 Deletti 'Phase 2' partnership. The Council will host 12 new rapid chargepoints under this scheme, run on renewable power, owned and operated by Wenea. Status: 6 installed. (On target to have 10 by 2028 as per Corporate Plan.)

3.5.3 Local Electric Vehicle Infrastructure (LEVI) scheme. Devon County Council's (DCC) procurement is completed. Delivery details to be announced.

4.0 **Corporate activities**

4.1 Net Zero Advisory Group (NZAG) is reviewing its Terms of Reference. Discussion thus far has covered the group type, how to run it, options for the areas of focus, choice of achievable goals, and the short time left before MDDC would merge with other authorities.

NZAG noted progress and milestones reached since the original Terms of Reference e.g.: award-winning Net-Zero-ready housing with excellent adaptation features; renovation of housing stock; Green Enterprise Grants for local businesses; tree planting and community orchards; engagement projects; boosting green transport infrastructure (active travel and EV); driving infrastructure investments and development masterplanning; progression through the Local Plan review (climate change being the overarching priority) with the interim planning policy statement and new resources to help developers design operational efficiency and Net-Zero-ready homes; Public Health initiatives for private sector housing (e.g. damp and mould campaigns,

government funding) air quality campaigns, taxi licensing policy to encourage cleaner vehicles, and supporting community emergency / resilience planning.

4.2 The C&S Specialist continues to give support to all teams and has:

- Maintained the C&S Corporate Plan performance data and a cross-team External Funding tracker (measure 1.2) and carried out risk reviews.
- Coordinated CAP monitoring.
- Commissioned and coordinated data collation for the carbon footprint report.
- Worked to support and brief the Corporate Management Team (CMT), service leads and others on corporate environment aims.
- Supported team meetings and Service Lead meetings with climate and sustainability being a regular agenda item. Met quarterly with key operational managers to support communications, teamwork and to help prioritise actions. Shared opportunities with Members, NZAG, CMT, colleagues etc.
- Provided NZAG secretariat support.
- Worked with the Cabinet Member to take forward actions raised by this PDG and NZAG with colleagues and partners.

4.3 Mid Devon District Council **ranked 32** out of 164 UK district and city council results on the Council Climate Scorecards, a campaign to compare climate action by local authorities. MDDC scored **44%** (up by 16 points this year), which placed us in the top 20% (8 out of 10 scored less). For context, other authorities scored 35% on average and the best was only 68%. This was encouraging but bear in mind the scorecards are unofficial and subjective.

Financial Implications. The financial implications associated with this report are the overall costs of the C&S Programme, budgets linked specifically to the Council's Corporate Plan, Climate Strategy and CAP.

Legal Implications. The Council's environmental sustainability duties are underpinned by legislation e.g. Environment Act 2021. All local authorities have obligations under the Climate Change Act 2008 with regard to climate change adaptation (resilience) and mitigation (emission reductions). Full Council declared a Climate Emergency in June 2019.

Risk Assessment. Progress on Performance Indicators (PI) provided separately by Performance and Risk Reports. There are 2 main risks (to the Council): 1) that the Council does not take sufficient actions to enable it to meet its Climate Emergency declaration ambitions; and 2) that the financial implications of Climate Change are not adequately measured and reflected in the Council's decision making.

Impact on Climate Change. The role of the C&S Specialist in support of the corporate officer team is central to the Council's C&S Programme by actions such as the development of strategic positions and delivery of projects through internal, community and partnership work.

Equalities Impact Assessment. There are no equality impacts associated with this report. Specific projects and policies are subject to the Public Sector Equality Duty. (Assessing the equality impacts of proposed changes to policies, procedures and practices is not only a legal requirement, but also a positive opportunity for authorities to make better decisions based on robust evidence.)

Relationship to Corporate Plan. Please refer to the Planning, Environment and Sustainability section and to the performance measures for points 1.1, 1.2 and 1.4.

Section 3 – Statutory Officer sign-off / mandatory checks

Statutory Officer: Andrew Jarrett
Agreed by or on behalf of the Section 151 Officer
Date: 10 September 2025

Statutory Officer: Maria De Leiburne
Agreed on behalf of the Monitoring Officer
Date: 10 September 2025

Chief Officer: Stephen Walford
Agreed by Chief Executive
Date: 10 September 2025

Performance and risk: Steve Carr
Agreed on behalf of the Corporate Performance & Improvement Manager.
Date: 05 September 2025

Cabinet member notified: Yes.

Report: Exclusion of the press and public from this item of business on the published agenda on the grounds that it involves the likely disclosure of exempt information. No.

Appendix: Exclusion of the press and public from this item of business on the published agenda on the grounds that it involves the likely disclosure of exempt information. No.

Section 4 - Contact Details and Background Papers

Contact: Jason Ball, Climate and Sustainability Specialist: Email: JBall@MidDevon.gov.uk Tel: 01884 255255.

Background papers: Previous update provided to this PDG on 10 June 2025. For background details, please refer to previous reports, all available online.

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Mid Devon District Council's Organisational Carbon Footprint 2024/25

CENTRE FOR ENERGY AND THE ENVIRONMENT

Internal Document 1087

June 2025

UNIVERSITY OF EXETER | CENTRE FOR ENERGY AND THE ENVIRONMENT

Author(s):	D Lash
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CENTRE FOR ENERGY AND THE ENVIRONMENT
University of Exeter
Hope Hall
Prince of Wales Road
Exeter, EX4 4PL
+44(0)1392 724159
www.exeter.ac.uk/cee

Management Summary

The Centre for Energy and the Environment at the University of Exeter was commissioned by Mid Devon District Council (MDDC) through the South West Energy and Environment Group (SWEEG) to develop and produce their annual carbon footprint for 2024/25. The footprint produced was based on BS EN ISO 14064-1 and the Greenhouse Gas Protocol. The inventory was produced for both traditional Scope 1 – 3 categories, and for a set of alternative categories.

Total net emissions for the 2024/25 period were 18,364 tCO_2e. Most emissions are Scope 3 (56%) with Scope 1 representing 33% of the total, and Scope 2 accounting for 12%. Net emissions in 2024/25 are 2% higher than in the previous year. Emissions from the alternative categories are broken down as follows:

- Buildings (excluding housing) 1,194 tCO_2e / 6% gross emissions: 41% of these emissions are from the leisure centres with a further 14% from the corporate estate (mainly council offices). Energy used by staff when working from home was estimated to be 6%. Emissions from this category reduced by 113 tCO_2e compared to the previous year, mainly due to switches to ASHPs and GSHPs.
- Social Housing 7,775 tCO_2e /41% gross emissions: Whilst this is the most significant source of emissions within the footprint, it is not based on metered data and MDDC does not have direct control over energy use within these buildings. Emissions from this category decreased by 751 tCO_2e mainly due to a lower assumed energy consumption per dwelling taken from Ofgem typical domestic consumption values. The estimate from this category could be improved in future years by looking to match consumption data for each property using post codes.
- Transport 1,520 tCO_2e / 8% gross emissions: Most transport emissions were from MDDC's fleet, with the majority of these associated with waste disposal. Emissions from this category remained about the same compared to the previous year.
- Procurement 8,295 tCO_2e / 44% gross emissions: Procurement represents a significant proportion of the footprint, of which over half is associated with construction activities. Estimation of emissions from procurement is inaccurate as it is based purely on spend data and coarse emission factors. Focussing on large areas of spend and looking to quantify GHG emissions using specific activity data would improve the quality of the calculations. Emissions from this category increased by 1,370 tCO_2e compared to the previous year, mainly due to increased spend and revised emission factors. Emissions are similar to the 2022/2023 figure.

Offsets -420 tCO_2e / -2% gross emissions: Offsets are responsible for only a small reduction in overall emissions, with almost all this due to the purchase of REGO backed electricity. Nonetheless, the reduction from these offsets have increased by 29%.

Contents

1 Introduction 1
2 General Approach 1
2.1 Definition of “Carbon Footprint” 1
2.2 Guiding Principles 1
2.3 Organisational Boundaries 2
2.4 Reporting Boundaries 3
2.5 Inventory Categories 4
2.6 Reporting Periods 6
2.7 Quantifying Emissions and Removals 6
2.8 Intensity Ratios 7
3 Data Collection and Analytical Approach by Category 7
3.1 Scope 1: Direct Emissions 7
3.2 Scope 2: Energy Indirect Emissions 10
3.3 Scope 3: Other Indirect Emissions 12
3.4 Offset Carbon 20
4 Results 21
References 26

1 Introduction

Mid Devon District Council (MDDC) commissioned the Centre for Energy and the Environment at the University of Exeter through the South West Energy and Environment Group (SWEEG) to quantifying their greenhouse gas (GHG) emissions (sometimes referred to as a carbon footprint) based on the most relevant standards. The Centre has produced MDDC's footprint every year since 2018/19.

There are two main standards in use that provide methods for quantifying organisational GHG emissions. The first of these is BS EN ISO 14064-1 [1] (referred to from here as ISO 14064) and the accompanying ISO/TR 14069 [2] which provides specific guidance on applying ISO 14064. The second is the Greenhouse Gas Protocol (referred to from here as the GHG Protocol) [3] which was revised in 2015, and has an accompanying documents [4] and [5] which provide more detail on quantifying emissions from supply chains. In addition, there is the UK's Environmental Reporting Guidelines (ERG) [6] (specifically Chapter 3), which is broadly based on 14064 and the GHG Protocol, but is a lot less detailed. Finally, PAS 2060 [7] enables organisations to demonstrate carbon neutrality. Within PAS 2060 (Annex C Table C.1) it lists ISO 14064, the GHG Protocol, and the ERG as the three standards that can be used by organisations to provide methods to quantify GHG emissions. In general, there is significant overlap between ISO 14064 and the GHG Protocol. It can be said that in meeting the ISO 14064 criteria, the GHG Protocol criteria and ERG will also be met.

2 General Approach

2.1 Definition of "Carbon Footprint"

A "carbon footprint" is taken here to be the net emissions of carbon dioxide equivalent by an organisation over a year (i.e., an annual GHG inventory), with the full boundaries of the organisation discussed in the sections below. The net emissions are established by calculating emissions from all sources (processes that release GHGs into the atmosphere), sinks (processes that remove GHGs from the atmosphere) and reservoirs (components other than the atmosphere that have the capacity to accumulate GHGs).

GHGs that contribute to anthropogenic climate change include carbon dioxide, methane, nitrous oxide, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs) and sulphur hexafluoride (SF6). These each have a different contributory impact to climate change for the same fixed mass. The total impact of all GHGs resulting from the activities of an organisation is measured by multiplying the mass of each gas emitted by its Global Warming Potential (GWP) to an equivalent mass of carbon dioxide termed "carbon dioxide equivalent" (measured in tCO_2e). Typically, GHG emission factors will already be based on carbon dioxide equivalents and so no additional calculations will be necessary. Section 5.2.2 of ISO 14064 states that direct emissions should be quantified separately for each GHG. However, it is recommended here the carbon footprint is reported as carbon dioxide equivalent only (i.e., in tCO2e) with no disaggregation into the separate GHGs.

2.2 Guiding Principles

As per Section 4 of ISO 14064 the footprint should be developed with the following principles:

- Relevance: GHG sources (and sinks and reservoirs) and methodologies should be appropriate
- Completeness: All relevant GHG emissions and removals should be included
- Consistency: Meaningful comparison in GHG-related information should be enabled
- Accuracy: Bias and uncertainty should be reduced as much as is practicable
- Transparency: Information should be sufficiently disclosed.

2.3 Organisational Boundaries

Confirming the organisational boundary is an important step at the outset of the production of the footprint. This is covered in Section 5.1 and Annex A of ISO 14064 and in more detail and with examples in Chapter 3 of the GHG Protocol. The two standards align in their approach. It is stated that organisations can comprise one or more facilities, and that at each of these GHG emissions may be produced from one or more sources or sinks. A facility is defined as a single installation, set of installations or production processes (stationary or mobile), which can be defined within a single geographical boundary, organizational unit or production process.

Facility-level emissions should then be consolidated by one of the following approaches:

- Control: The organisation accounts for all emissions over which it has either financial or operational control.
- Equity: The organisation accounts for its proportion of GHG emissions from respective facilities. This is more likely to be relevant for joint ventures (JVs)

The control approach is likely to be the most relevant here. Under the control approach 100% of GHG emissions are accounted for operations over which it has control. Emissions from operations where the organisation owns an interest but has no control are not included. Control is defined in one of two ways, and a choice must be made between them:

- Financial control: An organisation has financial control over the operation if it has the ability to direct the financial and operating policies of the operation with a view to gaining economic benefits from its activities. For example, financial control usually exists if the company has the right to the majority of benefits of the operation, however these rights are conveyed. Similarly, a company is considered to financially control an operation if it retains the majority risks and rewards of ownership of the operation's assets.
- Operational control: An organisation has operational control over an operation if it, or one of its subsidiaries, has the full authority to introduce and implement its operating policies at the operational level.

It is stated in the GHG Protocol that in most cases, whether an operation is controlled by the company or not does not vary based on whether the financial control or operational control criterion is used (though the oil and gas sector is a notable exception). In practice here, using either approach is likely to result in the same total emissions within the inventory. There may however be some differences in categorisation. For example, Annex F of the GHG Protocol outlines in detail how to account for emissions from leased assets. For each scenario emissions will fall within the footprint, though whether they are Scope 1/2 or Scope 3 (scopes will be discussed in the next section) will depend on the type of lease. There are two types of leases which are:

- Finance or Capital lease: This type of lease enables the lessee to operate an asset and also gives the lessee all the risks and rewards of owning the asset. Assets leased under a capital or finance lease are considered wholly owned assets in financial accounting and are recorded as such on the balance sheet. Under this lease the lessee is considered to have ownership and both financial and operational control of the leased asset. Conversely, the lessor does not have ownership or financial or operational control of these assets.
- Operating lease: This type of lease enables the lessee to operate an asset, like a building or vehicle, but does not give the lessee any of the risks or rewards of owning the asset. Any lease that is not a finance or capital lease is an operating lease. Under this lease the lessee is considered not to have ownership or financial control but to have operational control of the

leased asset. Conversely, the lessor has ownership and financial control of these assets but not operational control.

The allocation of emissions depending on the lease type and whether the asset is being leased or let out using the Financial Control approach is shown in Table 1. If an Operational Control approach is used instead, then the values for the Operating lease column are swapped (i.e., Scope 1/2 becomes Scope 3 and vice-versa).

Table 1: Allocating emission from leased assets under using an organisation's Financial Control boundary for lessee and lessor scenarios (adapted from Annex F GHG Protocol)

Perspective	Finance/Capital Lease	Operating Lease
MDDC are the lessee e.g., tenant	Lessee does have ownership and financial control, therefore emissions associated with fuel combustion are scope 1 and with use of purchased electricity are scope 2.	Lessee does not have ownership or financial control, therefore emissions associated with fuel combustion are scope 3 and with use of purchased electricity are scope 3.
MDDC are the lessor e.g., landlord	Lessor does not have ownership or financial control, therefore emissions associated with fuel combustion are scope 3 and with use of purchased electricity are scope 3.	Lessor does have ownership and financial control, therefore emissions associated with fuel combustion are scope 1 and with use of purchased electricity are scope 2.

It is recommended that the footprints should be produced based on a Financial Control organisational boundary.

2.4 Reporting Boundaries

Organisations should establish reporting boundaries and sources and sinks of GHG emissions within each. These are separated into direct and indirect emissions with sub-categories as discussed in the next section. This results in Scopes 1, 2 and 3 emissions as follows and shown in Figure 1:

- Scope 1 (direct emissions): Activities owned or controlled by the organisation that release emissions straight into the atmosphere, e.g., combustion in owned boilers or vehicles.
- Scope 2 (energy indirect): Emissions released into the atmosphere associated with the consumption of purchased electricity, heat, steam, and cooling.
- Scope 3 (other indirect): Emissions that are a consequence of the organisation's actions, which occur at sources which are not in ownership or control of the organisation, e.g., business travel by means other than company vehicles, waste disposal, or purchased materials.

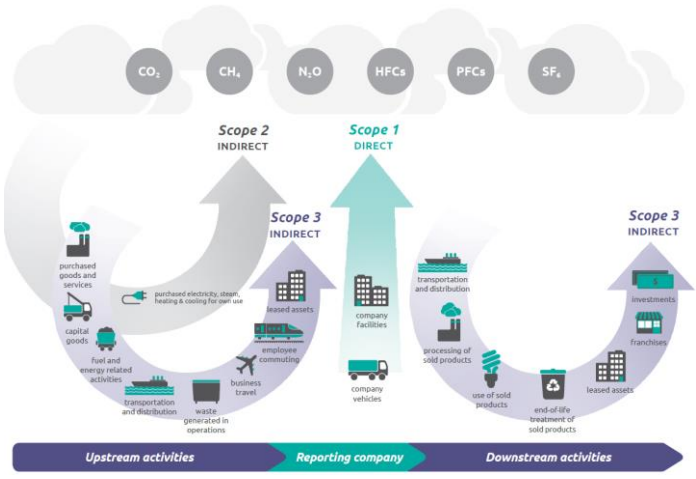


Figure 1: The relationship of direct and indirect emissions [Source: GHG Protocol]

Scope 3 emissions can occur upstream, downstream, or be designated as out of stream. This is helpful to avoid double-counting between organisations. The inclusion of indirect emissions (Scope 3) with discussion of this in Annex H of ISO 14064. Here it is stated that these criteria should be based on those stated in Section 2.2 of this report and that significance should be based on magnitude, level of influence, business risk or opportunity, sector-specific guidance, outsourcing and employee engagement. These should be assessed for significance with the help of external experts, sector-specific guidance, literature reviews or third-party databases. Often, a significance test will be clear but where it is not (for example where data is qualitative) then a "deeper analysis of the criteria may be helpful". An example is given where it is estimated that a source is estimated to be approximately 10% of an organisation's total indirect emissions but that relevant data would be very expensive to obtain, and the resulting accuracy would be poor. In all cases where sources of emissions are not included this should be stated in a transparent manner. The next section discusses categories in more detail.

2.5 Inventory Categories

Categories within each of the three scopes are provided by ISO 14064 and the GHG Protocol and their secondary documents respectively. These two standards were cross-referenced and in general they align, with some minor differences. These include slight category name differences, ISO 14064 having a "Client and Visitor" category and the GHG Protocol having a "Processing of Sold Products" category exclusively of one another. ISO 14064 does however have a catch-all "Other Indirect Emissions" category so in that sense is more comprehensive and has been chosen as the basis for selection of sub-categories here. A list of categories and whether they have been scoped in and out for the footprints based on initial assessments and discussions is shown in Table 2. Specific explanation of what is included within each of these together with data collection and calculation approaches is provided in Section 3.

Table 2: Inventory categories and their recommended inclusion or not within the footprint

Scope	Upstream/ Downstream	No.	Category ISO 14064-1	Include/ Exclude
Scope 1: Direct GHG emissions and removals				
1	Direct	1	Direct emissions from stationary combustion	Include
		2	Direct emissions from mobile combustion	Include
		3	Direct process related emissions	Exclude
		4	Direct fugitive emissions	Include
		5	Direct emissions and removals from Land Use, Land Use Change and Forestry (LULUCF)	Exclude
Scope 2: Energy GHG indirect emissions				
2	Upstream	6	Indirect emissions from imported electricity consumed	Include
		7	Indirect emissions from consumed energy imported through a physical network	Exclude
Scope 3: Other indirect GHG emissions				
3	Upstream	8	Energy-related activities not included in direct emissions and energy indirect emissions	Include
		9	Purchased goods and services[1]	Include
		10	Capital equipment	Include
		11	Waste generated from organisational activities	Include
		12	Upstream transport and distribution	Exclude

[1] This category is called "Purchased products" in ISO 14064 but the equivalent GHG Protocol category "Purchased goods and services" is deemed more appropriate.

		13	Business travel	Include
		14	Upstream leased assets	Exclude
		15	Investments	Exclude
	Downstream	16	Client and visitor transport	Exclude
		17	Downstream transport and distribution	Exclude
		18	Use stage of the product	Exclude
		19	End of life of the product	Include
		20	Downstream franchises	Exclude
		21	Downstream leased assets	Exclude
		22	Employee commuting	Include
	Varies	23	Other indirect emissions not included in the other 22 categories	Exclude

In addition to the above categories, there is value in reporting against categories that better align with the internal organisation of MDDC. For example, emissions from buildings may arise from stationary combustion (category 1 in Table 2), imported electricity (6), energy related activities (8), capital equipment (10) i.e., the construction of new buildings, and upstream leased assets (14) i.e., buildings that MDDC are tenants in. Reporting emissions under a "buildings" category with additional sub-categories as required, may be more informative. A secondary reporting category list can be produced by mapping all the categories (including splitting categories where necessary) into the new list. Following discussions with MDDC, a secondary category list has produced as follows:

1. Buildings (exc. housing)
    1. Corporate Estate
    2. Leisure Centres
    3. Other Non-Domestic
    4. Waste from Buildings
    5. Homeworking Energy
2. Social Housing
    1. Operational emissions
3. Transport
    1. Own Vehicles
    2. Grey Fleet
    3. Business Travel
    4. Commuting
4. Procurement
    1. Goods
    2. Construction
    3. Services
5. Offsets
    1. Exported Renewable Energy
    2. REGO Electricity
    3. Land Use Change
    4. Purchased Offsets

2.6 Reporting Periods

The carbon footprint should be undertaken for a period covering one year and should be updated on an annual basis. Here, the footprint will be aligned to the financial year April 2024 to March 2025.

The underlying data and emission factors used in the calculations should be based on the chosen reporting period. Where there is no data available covering the full reporting period, the following hierarchical approach should be taken:

1. If data is available for part of the period, then it should be used to provide an average value for that period of time and then multiplied up to estimate the total for a year. For example, if consumption data is only available for half of the year, then it should be doubled to estimate consumption for a full year. In the case of data that is sensitive to the time of year (for example gas consumption in buildings), then efforts should be made to normalise the consumption for the time of year (for example degree day data can be used in this case).
2. If partial data is not available, then data from the previous year's footprint should be used.
3. If no data from previous years are available, then estimates should be made using secondary sources of data e.g., benchmark data in the case of building energy consumption.

In all cases, if data is not available for a full year, then measures should be put in place to enable the data to be available for the next year's footprint. In addition, it should be clearly stated where estimates have been made in the absence of data being available.

2.7 Quantifying Emissions and Removals

Calculation methodologies should be selected to minimise uncertainty and yield accurate, consistent, and reproducible results. This should consider technical feasibility and cost of data gathering. Within each category, sources and sinks should be identified. Annex C of ISO 14064 provides detailed supplementary guidance on selecting data and developing models and methods for quantifying emissions and removals. It is stated that data that is typically uses includes:

- Activity data e.g., mass, volume, energy or monetary value
- Calorific values
- Emission factors, usually expressed as tCO_2e/quantity of activity data
- Composition data, usually expressed as carbon content, often used for higher accuracy and primary and site-specific emission factor calculations
- Oxidisation factors
- Conversion factors
- Emissions, usually on a mass basis per a reference period (e.g., hourly);
- Monetary values, usually amounts spent on certain products, materials or services

Some of the above are likely to be more relevant than others here. In general, calculating emissions from an activity will depend on the data available from the organisation. As it is not practicable to directly measure the actual mass of GHGs emitted from an activity, the calculation will take the form of multiplying some input activity data with an emission factor.

The choice of activity data will depend on what is available, but in principle a data hierarchy approach should be taken that priorities primary data (i.e., that collected by the organisation) and site-specific data over secondary data and other estimates. For example, for emissions from vehicles, it would be preferable to use the actual amount of fuel used to the amount spent on fuel, which in turn would be more accurate than knowing the distance travelled. Where a mix of data is available within a category then the hierarchy approach should still be followed. For example, if fuel consumption data exists for

some vehicles and mileage data exists for all vehicles, then the fuel consumption data should be used for those vehicles, and the mileage data for the remainder. In addition, steps should be put in place to capture fuel consumption data for all vehicles for the following year's inventory. Specific guidance on the expected hierarchy for each category identified in Section 2.5 is provided in Section 3.

Emission factors may come from a range of sources, however the most extensively used will be the UK GHG Conversion Factors for Company Reporting [8] (referred to from here as the "Government EFs"). These provide consistent emission factors to be used for a range of activities and are updated annually.

In all cases, as a minimum an aggregate value should be quantified for each category. However, there will be benefits to maintaining as fine a level of granularity as the source data enables within the calculations and reporting. For example, for buildings this would include calculating emissions on a per-building basis if metered data is available for each building, rather than just as the sum-total of all buildings within the estate. For reporting it may be preferable to only separate out the most significant sources within the category to avoid long unmanageable lists e.g., for large buildings, with smaller buildings or sites aggregated together. The full detail should however be retained within calculation tools or spreadsheets to enable onward analysis.

Any emissions offset using carbon credits should be separately reported and the guidance in Section 9 and Annex C of PAS 2060 should be used to ensure the integrity of those offsets.

It is stated in ISO 14064 that uncertainty in the outputs should be quantified and documented, and guidance for doing so is given in ISO/TR 14069. However, this approach relies on knowing in quantified terms the uncertainty associated with each part of the calculation (activity data and emission factors), and as this will not be known it is recommended that at this time, quantifying of uncertainty will not be possible and should not be pursued.

2.8 Intensity Ratios

The headline inventory should be reported in absolute terms as tCO_2e. In addition, normalising the emissions (either totals, sub-totals, or for individual categories) by some common variable to produce "intensity-based" emissions enables the result to be contextualised, and some comparison between different organisations to be made. This has not been done here.

3 Data Collection and Analytical Approach by Category

3.1 Scope 1: Direct Emissions

3.1.1 Direct emissions from stationary combustion

Description

Direct emissions arising from the combustion of fuels (for example, natural gas or oil) on-site in plant (for example boilers or generators) within the organisational boundaries of the reporting organisation. In practice, this is likely to be predominantly gas boilers in owned buildings.

Data Hierarchy and Calculation Approach

The aim should be to establish emissions at a building level of granularity. The following hierarchy should be followed for data collection (best to worst):

1. Quantity of Fuel: Amount of fuel obtained from metered or measured data e.g., kWh natural gas or litres of fuel.

2. Spend on Fuel: Amount spent per fuel which can then be converted to quantity of fuel using the gas and electricity prices in the non-domestic sector dataset [9] that is produced annually (for oil, the local price should be used).
3. Floor Area: The gross internal floor area of each building together with the building type (e.g., office). If this is not available then CIBSE TM46 [10] which provides average benchmark energy consumption values for different building types can be used to establish fuel consumption.

For the first two of these, if data is only available for part of the year then to extrapolate for a full year, degree day analysis as described in CIBSE TM41 [11] should be used so that the annual estimate is not biased by the period for which data is available.

In all the above, once the quantity of fuel used has been established in kWh, then this can be converted to GHG emissions using the Government EFs.

Allocations of emissions from boilers etc. has the potential to be allocated either here (direct emissions) or under "Upstream leased assets" (Section) depending on the type of lease as described in Section 2.3, though the data gathering and calculation method is the same.

Approach Taken for Footprint

MDDC own both non-domestic buildings, and social housing. The non-domestic building is a mix of council offices, leisure centres, other council buildings, and buildings that are owned but leased out to others. Metered data was generally available for the offices and leisure centres, and a small number of the other buildings. For the remainder, annual energy consumption was estimated based on floor area and the CIBSE TM41 benchmarks. These were then combined with the Government EFs to calculate GHG emissions.

Metered data from social housing was not available. Social housing emissions were calculated based on estimated energy consumption from a dwelling asset list. The dwelling heating system was used to establish the fuel type. Ofgem average metered consumption for gas heated dwellings was assumed for all non-electric heating systems. For electrically heated buildings (Scope 2), electricity profile class 2 was assumed for electricity consumption. For dwellings heated by heat pumps, the same energy use as for a gas heated home was assumed, though adjusted for an ASHP with an assumed efficiency of 2.5. Adjustments were made for any PV (based on a derived generation of 892 kWh/kWp from MDDC data and a presumption of 50% self-consumption) or SWH systems (assumed 1,439 kWh saving for gas heated dwellings or 428 kWh savings for electrically heated dwellings, inferred from an Energy Savings Trust guide). All energy consumption was combined with the Government EFs to calculate GHG emissions.

Alternative Categorisation and Mapping

For the alternative categories, emissions from this category should be allocated to:

- Buildings (exc. housing) > Corporate Estate > *By Site*
- Buildings (exc. housing) > Leisure Centres > *By Site*
- Buildings (exc. housing) > Other Non-Domestic > *By Site*
- Social Housing > Operational Emissions > *Aggregate Total*

3.1.2 Direct emissions from mobile combustion

Description

Direct emissions arising from fuel burnt in transport equipment within the organisational boundaries of the reporting organisation. In practice, this will be emissions from owned vehicles. Emissions from other transport will be accounted for within Scope 3 categories.

Data Hierarchy and Calculation Approach

The aim should be to establish emissions for each vehicle within the fleet, with reporting aggregated to sensible summary headings e.g., vehicle types, or departments. Where individual vehicle data is not available (e.g., a department only knows total fuel consumption for that department) then this would provide the same overall result but would offer less opportunity to identify potential improvements. The following hierarchy should be followed for data collection (best to worst):

1. Quantity of Fuel: Amount of each fuel (e.g., diesel or petrol) obtained from recorded data. This can then be multiplied by the fuel emission factors ($kgCO_2e$/litre) from the Government EFs.
2. Spend on Fuel: Amount spent per fuel which can then be converted to quantity of fuel using the weekly road fuel prices dataset [11] that is produced annually. This can then be multiplied by the fuel emission factors ($kgCO_2e$/litre) from the Government EFs.
3. Distance and vehicle emission factor: The annual distance travelled by each vehicle should be multiplied by the vehicle specific emission factor (gCO_2e/km) provided by the vehicle manufacturer. This is likely to under-estimate emissions, as these emission factors are typically more optimistic than those observed under real world conditions.
4. Distance and Mode: Where the above information is not available, then the annual distance travelled by each vehicle should be multiplied by the emission factors from the Government EFs which are available for a range of different vehicle types in $kgCO_2e$/km.
5. Where none of the above are available, then estimates of distance should be made and steps taken to better capture activity data (ideally quantity of fuel) for the forthcoming year of reporting.

Approach Taken for Footprint

Total litres of diesel for each of District Officer, Grounds Maintenance, Property Services, Recycling, Refuse, Street and Trade Waste was provided. This was combined with the Government EFs to calculate GHG emissions. For this year, improved consumption data was available extending back annually to 2018/19, and so this was used to update the historic footprints as reported here.

Alternative Categorisation and Mapping

For the alternative categories, emissions from this category should be allocated to:

- Transport > Own Vehicles > *By Service*

3.1.3 Direct process related emissions

This category has been taken to be out of scope as it is not relevant.

3.1.4 Direct fugitive emissions

Description

These are direct uncontrolled emissions of GHG, with any process that directly utilises GHG being a potential source of emissions. In practice, this will mean emissions of refrigerants for space conditioning systems in buildings (e.g., cooling or heat pumps) and potentially vehicles owned by the organisation.

Data Hierarchy and Calculation Approach

The aim should be to calculate emissions at a building resolution. Emissions from vehicle cooling systems are likely to be very small. The following hierarchy should be followed for data collection (best to worst):

1. Amount and type of refrigerant: The mass (kg) of refrigerant (by type) available from each system within a building. It is noted that systems above 12 kW are required under the Energy Performance of Buildings Directive to undertake regular air conditioning inspections. This can then be multiplied by the emission factor for the relevant GHG ($kgCO_2e/kg$) from the Government EFs.
2. Equipment list: Where the above is not available, then an asset list should be produced outlining each relevant unit within a building including the refrigerant type and charge mass (kg). Annex C of the ERG provides a method for converting this to total mass leakage during installation, operation, and disposal years which can then be multiplied by the emission factor for the relevant GHG ($kgCO_2e/kg$) from the Government EFs.
3. Where neither of the above is available then this category should be excluded, and steps taken to capture the relevant data for the forthcoming year.

Approach Taken for Footprint

No data was available and so this was left excluded this year.

Alternative Categorisation and Mapping

For the alternative categories, emissions from this category should be allocated to:

- Buildings (exc. housing) > Corporate Estate > *By Site*
- Buildings (exc. housing) > Leisure Centres > *By Site*
- Buildings (exc. housing) > Other Non-Domestic > *By Site*

3.1.5 Direct emissions and removals from Land Use, Land Use Change and Forestry (LULUCF)

This category has been taken to be out of scope.

3.2 Scope 2: Energy Indirect Emissions

3.2.1 Indirect emissions from imported electricity consumed

Description

These are indirect emissions associated with the import of electricity by the organisation. It excludes upstream emissions associated with the production of fuels feeding power stations, embodied emission associated with the production of generation plant, and the transmission and distribution network (these are captured within Scope 3). In practice, this will be electricity consumption from buildings, and increasingly vehicles.

Data Hierarchy and Calculation Approach

The aim should be to establish emissions at the same level of resolution as direct emissions of buildings and vehicles described earlier. As such, the same data hierarchy and calculation methods described in Sections 3.1.1 and 3.1.2 should be followed for buildings and vehicles respectively regarding activity data and emission factors when using a “location-based” approach to imported electricity as discussed in Annex E of ISO 14064. This approach uses grid-averaged emission factors and are available within the Government EFs. If time-specific emission factors are available and can be used in conjunction with

corresponding electricity consumption data, then this may be used instead of average grid emission factors.

An alternative approach regarding emission factors is to use a "market-based" approach. This allows the organisation to use an emission factor provided by the electricity supplier provided that the energy contract (e.g., a Power Purchase Agreement [PPA] or Renewable Energy Guarantee of Origin [REGO]):

- Conveys the information associated with the unit of electricity delivered together with the characteristics of the generator
- Is ensured with a unique claim
- Is tracked and redeemed, retired, or cancelled by or on behalf of the reporting entity
- Is as close as possible to the period to which the contractual instrument is applied and comprises a corresponding timespan

The ERG recommended that if the market-based approach is used, then in addition that these results are presented alongside the location-based approach.

Where the organisation generates renewable energy (for example from photovoltaic panels on the roof of a building), then of the generated electricity a portion will be self-consumed (and so will be reflected in a reduced demand for imported electricity), and the remainder will be exported. Annex G of the ERG states that this component can be used to reduce the net tCO_2e figure, and that in addition the total offset arising from exported generated electricity must not be greater than gross Scope 2 emissions. In this case, to account for the offset within the inventory metered data from an export meter would be required. The ERG also state that organisations can also report on the amount of consumed generated renewable energy, though this is not a requirement.

To summarise, it is proposed that:

- Scope 2 emissions arising from imported electricity for buildings and vehicles should be calculated using the aforementioned activity data and location-based emission factors e.g., from the Government EFs
- If the organisation generates renewable electricity and there is metered export kWh data available, then this should me multiplied by the location-based grid average Scope 2 "electricity generation" emission factor from the Government EFs, and this value reported as an offset (negative value) at the end of the inventory in Section 3.4. This offset can be used to demonstrate an overall reduction in emissions from the gross total to result in a net total and cannot be greater than the total gross Scope 2 emissions.
- Where the organisation has a contract with a supplier to provide low carbon electricity e.g., via a PPA, then the emission factor from that supplier can be used to calculate the equivalent offset compared to the location-based approach and reported as an offset to enable a net emissions to be calculated as described above. It is important that any renewable energy used within the supply contract can be demonstrated to be additional.
- There is no need to establish or report emissions that are avoided via the self-consumption of renewable electricity.
- Upstream emissions arising from electricity consumption are captured within Scope 3 of the footprint.

Approach Taken for Footprint

For buildings, the same process as described in Section 3.1.1 was followed. Exported renewable energy and REGO purchased electricity was also reported separately as offsets.

Alternative Categorisation and Mapping

For the alternative categories, emissions from this category should be allocated to:

- Buildings (exc. housing) > Corporate Estate > *By Site*
- Buildings (exc. housing) > Leisure Centres > *By Site*
- Buildings (exc. housing) > Other Non-Domestic > *By Site*
- Social Housing > Operational Emissions > *Aggregate Total*
- Offsets > Exported Renewable Electricity > *Aggregate Total*
- Offsets > REGO Electricity > *Aggregate Total*

3.2.2 Indirect emissions from consumed energy imported through a physical network

This category has been taken to be out of scope as it is not relevant.

3.3 Scope 3: Other Indirect Emissions

3.3.1 Energy-related activities not included in direct emissions and energy indirect emissions

Description

These are indirect emissions associated upstream activities associated with fuel and electricity consumption by the reporting organisation. Examples include the extraction, production, transport, and distribution of fuel and energy. In practice, this will be an additional well to tank (WTT) uplift on all fuel use from stationary and mobile construction (Sections 3.1.1 and 3.1.2), imported electricity (Section 3.2.1), business travel (Section 3.3.6), upstream leased assets (Section 3.3.7) and employee commuting (Section 3.3.15).

Data Hierarchy and Calculation Approach

The data collection will be exactly the same as for emissions from direct combustion from stationary and mobile equipment and imported electricity, but rather than using the emission factor in those sections, the emission factor for WTT as stated in the Government EFs should be used instead. In practice, this will uplift the total emissions arising from a building or vehicle. For fuel combustion (e.g. natural gas or oil), there is a single WTT factor associated with that fuel. For electricity, the upstream emissions include WTT emissions associated with combustion at the generation plant (e.g., remote power stations), the transmission and distribution (T&D) network, and then WTT emissions on the T&D network. It would be reasonable to sum these three emission factors to get a single additional "WTT" emission factor for imported electricity consumption. This electricity total WTT emission factor should be applied only to any imported electricity (i.e., not to onsite generated and exported electricity).

Approach Taken for Footprint

These were calculated automatically in the spreadsheet created for the analysis by establishing these emissions in parallel to the main emission source, as described above.

Alternative Categorisation and Mapping

For the alternative categories, emissions from this category should be allocated to:

- Buildings (exc. housing) > Corporate Estate > *By Site*
- Buildings (exc. housing) > Leisure Centres > *By Site*
- Buildings (exc. housing) > Other Non-Domestic > *By Site*
- Social Housing > Operational Emissions > *Aggregate Total*
- Transport > Own Vehicles > *By Service*
- Transport > Grey Fleet > *Aggregate Total*

- Transport > Business Travel > *By Mode*
- Transport > Commuting > *Aggregate Total*

3.3.2 Purchased products and services

Description

These are emissions associated with the consumption of goods and services by the reporting organisation that are not otherwise included elsewhere in the inventory. For example, capital equipment, business travel, or electricity consumption are all examples of goods and services that are consumed, but they are already accounted for within specific sub-categories in the inventory that have been created within the standards to improve transparency and consistency. These scope of these emissions are “cradle to gate” i.e., all emissions that occur up to the point of sale by a producer e.g., raw material extraction, transport to a manufacturing facility, processing etc., but not including onward transport to the customer (the reporting organisation here), which is covered in Section □ “upstream transport and distribution”. In practice, this category will rely heavily on engagement with both procurement departments, and supply chain partners.

Data Hierarchy and Calculation Approach

The ultimate goal to aim for would be to have specific quantified emissions for each good or service purchased by the organisation. In practice, this will not at this moment be achievable, and there will need to be a balance found between having sufficient granularity and accuracy of outputs against the time and effort required to calculate emissions from supply chains. Reporting may be by supplier and/or sector.

An initial scoping exercise based on the “spend-based” calculation method (see point 4 in the list below) should be adopted to establish significance within the procurement activities of the organisation. The GHG Protocol contains examples where capturing 80% of spend using more detailed calculation approaches and then extrapolating for the remaining 20% may be appropriate.

The GHG Protocol supply chain guidance documents discuss four calculation methods, of which only first and last are likely to be practicable here. The following hierarchy should be followed for data collection (best to worst):

1. Supplier-specific method: This involves obtaining product level data directly from the supplier, and three methods ranked best to worst are described here:
    a. The emissions from the product will have been calculated by the supplier ideally following the BS EN ISO 14067 standard [12] of Environmental Product Declarations (EPDs) [13]. The product emission factors used should be “cradle to gate” and not full lifecycle. These standards would provide the assurance that a fair and recognised approach has been adopted.
    b. If a supplier has undertaken product calculations but has not followed these standards then it may still be possible to use their data though this should be done with caution and in discussion with the supplier to understand the calculations.
    c. If this is not available, then the supplier may have produced their own emissions intensity value (e.g., kgCO_2e/£ spent) based on their own specific data, which could then be used with the value of the contract to estimate emissions.
2. Hybrid method: This approach effectively relies on gathering all the relevant data from a supplier (for example Scope 1 and 2 emissions, plus data such as mass of upstream materials) to enable the reporting organisation to then calculate the emissions. This option is discounted here as likely to be too resource-intensive to be applicable in most/all cases.

3. Average-data method: This method involves gathering quantified activity data (other than cost) such as mass of product, number of., hours spent etc. which can then be used with secondary data e.g., published databases, government statistics, literature studies, and industry associations. The GHG Protocol provides examples of databases [14], some of which are commercial. Adopting this method would rely on both capturing activity data using quantities other than contract value, and collectively deciding on the appropriate database for each product and applying it. As the former is not routinely undertaken and certainly not holistically across all categories of procurement, this option is discounted at this moment.
4. Spend-based method: This method involves assigning a sector (e.g., using the Standard Industry Classification [SIC] codes) to each item of spend, and then multiplying the value with a sector-specific emission factor. It may be more time-efficient to aggregate spend items by supplier and then rank suppliers by total spend. It is likely that a pareto principle will apply meaning that manual allocation of sector can be applied to the highest spend suppliers and then for the "tail" an average can be applied based on the top suppliers. This is the approach outlined in the ERG and Annex E, though the emission factors there are very out-dated. The most recent and applicable emission factors to be used are from the UK's carbon footprint dataset [15] in the "SIC multipliers" sheet. Whilst this method is effective at being able to relatively quickly calculate emissions arising from anywhere in the economy, it is important to recognise it is not likely to be accurate and cannot distinguish emissions between spend within a category or between suppliers, and is only really useful as an initial rough "snapshot" rather than as a tool that can identify specific opportunities or track changes over time (as the only two factors in the calculation are amount spent and the emission factor).

In all cases, it is important to avoid the potential for double counting by excluding calculation of emissions that are already accounted for elsewhere. For example, in the case of adopting a spend-based analysis, the amount spent on suppliers of energy and business travel should not be included here as they will be included elsewhere in the inventory.

Approach Taken for Footprint

Spend data broken down into detailed account codes was provided. These account codes were cross referenced against the list of codes provided in past footprint exercises. The previous years' allocations were then used to allocate a sector to all account codes in the current period. Any spend that was being included using a more specific method (e.g. energy use), or that was outside of the scope of the footprint, was excluded from the calculations. The spend in each sector was multiplied by the emission factor given in the UK Carbon Footprint. As these are always available only two years in arrears, these emissions factors were adjusted for inflation. In addition, this year saw the government make changes to previously published historic emission factors, and so this may result in some small changes to reported emissions from previous years.

Alternative Categorisation and Mapping

For the alternative categories, emissions from this category should be allocated to:

- Procurement > Goods > *Aggregate Total*
- Procurement > Construction > *Aggregate Total*
- Procurement > Services > *Aggregate Total*

3.3.3 Capital equipment

Description

These are emissions associated with the purchase of capital goods. There is the potential for overlap in the categorisation of either purchased goods/products, and capital goods and so it is important that they are only accounted for in one place. The GHG Protocol states that *"Capital goods are final products that have an extended life and are used by the company to manufacture a product; provide a service; or sell, store, and deliver merchandise. In financial accounting, capital goods are treated as fixed assets or as plant, property, and equipment (PP&E). Examples of capital goods include equipment, machinery, buildings, facilities, and vehicles"*. Whilst purchased products are sometimes referred to as "consumables" and are used over a short period of time (e.g., days or usually less than a year), capital goods are used for much longer periods (e.g., 5 to 50 years). Whether a good is classified as a "purchased product" or "capital good", the reporting should make clear which category it is being accounted for in.

In practice this is likely to include:

- The construction of new buildings: Emissions should be reported on a per building basis.
- Major refurbishment of existing buildings, including replacement of major plant: Emissions should be reported on a per building basis for refurbishment, whilst major plant can be aggregated.
- New vehicles: Emissions can be reported as aggregated values with descriptions e.g., 20 new cars for Division X etc.

Data Hierarchy and Calculation Approach

Emissions can be calculated in the same way as for purchased products and services (Section). For the "supplier-specific method", for buildings and general plant there is guidance and standards available from LETI [16] and CIBSE [17] respectively that can help with quantifying cradle-to-gate emissions from projects. As with the purchased products and services section, the "supplier-specific method" and "spend-based method" are likely to be the only two relevant calculation methods.

There is some disagreement between ISO 14064 and the GHG Protocol on handling amortisation of emissions. This is where emissions can be divided by the time period of the capital good, for example if a vehicle is expected to be amortised over 10 years in the organisation's accounts, then the cradle-to-gate emissions can be divided by 10 and added in each of the next 10 years of the inventory. Whilst ISO 14064 states that this is an allowable approach, the more recent guidance from the GHG Protocol states that in accounting for emissions from capital goods *"…companies should not depreciate, discount, or amortize the emissions from the production of capital goods over time. Instead companies should account for the total cradle-to-gate emissions of purchased capital goods in the year of acquisition, the same way the company accounts for emissions from other purchased products in category 1. If major capital purchases occur only once every few years, scope 3 emissions from capital goods may fluctuate significantly from year to year. Companies should provide appropriate context in the public report (e.g., by highlighting exceptional or nonrecurring capital investments)"*. This guidance should be followed here.

Approach Taken for Footprint

The procurement spend from Section 3.3.2 was used to capture capital spend i.e. no distinction was made in the source data between capital and revenue spend. All emissions were reported within Section 3.3.2.

Alternative Categorisation and Mapping

See section 3.3.2.

3.3.4 Waste generated from organisational activities

Description

Waste can impact on organisational GHG emissions in several ways, including:

- The use of recycled materials in the products the organisation purchases (already potentially accounted for in the purchase of those materials).
- The transport and subsequent processing of waste generated by the organisation. This is what is covered within this section. Technically, the transport of waste from the organisation to the waste treatment facility would constitute "upstream transport and distribution", however as the Government EFs combine the transport and waste processing impact, they are assumed to be included within this section.
- The onward disposal of waste from products sold by the organisation. This is not applicable here.

For waste generated by the organisation that is recycled, this has two potential GHG reducing benefits, firstly the reuse of material can lower embodied emissions from purchased products (this is accounted for in the purchase of those products), and secondly by avoiding sending that waste to be processed (e.g., preventing material from entering landfill sites). The second of these can be optionally reported as "avoided emissions", however as the supporting data is likely to be hard to obtain and the overall impact minimal, it is recommended that this is not reported.

Data Hierarchy and Calculation Approach

The aim should be to obtain data at building resolution (i.e., waste produced at each site), however this may not be possible and given the predicted low overall impact from this section, a single aggregated value may be acceptable. The following hierarchy should be followed for data collection (best to worst):

1. Site data: Where the specific mass of data is available then this should be used. If this is available at building/site resolution then this should be used, or if not then aggregated. Where mass is broken down by waste stream (e.g., paper, plastics, electrical equipment etc.), then this should be used. Otherwise, the generic "commercial and industrial waste" category should be assumed. The mass of each waste stream (or total) should be allocated a waste processing method (e.g., landfill, energy from waste, open-loop recycling etc.). If this is not known, then an assumption should be made based on knowledge of waste contracts within the organisation. The derived annual mass of waste (tonnes) can then be multiplied by the corresponding emission factor from the Government EFs. It should be noted that these factors include an allowance for typical transport distances to a waste processing site and for the processing itself. As the benefit of recycling and energy recovery from waste are accounted for in the supply of recycled material and energy, for most EFs that values are low as they only include the transport component. The notable exception to this is any organic waste (and the generic "commercial and industrial waste" category) sent to landfill.
2. Benchmark data: Where specific site data is not available, then benchmark data waste generation data [18] may be applicable. This can be multiplied by the number of staff (FTE) and then applied with the Government EFs.
3. Spend data: Alternatively, if the value of the waste contract is known (£) then this can be multiplied by the "Waste collection, treatment and disposal services; materials recovery services" category from the SIC sectors as described in Section 3.3.2.

Approach Taken for Footprint

An estimate of waste produced by MDDC was made by multiplying the capacity of the bins at each site by an assumed collection frequency. It was assumed that all waste was either recycled, or processed at an energy from waste plant.

Alternative Categorisation and Mapping

For the alternative categories, emissions from this category should be allocated to:

- Buildings (exc. housing) > Waste from Buildings > *Recycled/Residual waste aggregates.*

3.3.5 Upstream transport and distribution

This category has been taken to be out of scope as it was not meaningfully possible to establish these emissions, for example associated with purchased goods.

3.3.6 Business travel

Description

This section includes emissions from business travel in vehicles owned or operated by third parties and also includes emissions associated with hotel stays on business trips. The aim should be to report emissions by mode of transport and for hotel stays as follows.

- Cars – hire cars
- Cars – "grey fleet" (employee-owned vehicles other than employee commuting)
- Taxis
- Air travel
- Rail travel
- Bus and coach travel
- Hotel stays

Emissions associated with travel in vehicles owned or leased by the organisation, or from commuting, are covered in other sections.

Data Hierarchy and Calculation Approach

The aim should be to establish emissions for each mode. The following hierarchy should be followed for data collection (best to worst):

1. Fuel-based method: Where fuel usage is known (e.g., from fuel cards used in hire cars or the grey fleet), these should be used with the Government EFs ("average car unknown fuel" emission factor, unless better records are available within the organisation) as described in Section 3.1.2). In some cases, mileage claims will be available in which case the distance can be used directly, or converted from spend to distance using the claim rate (e.g. 45p/mile). The amount of fuel used will not be obtainable for other modes e.g., public transport.
2. Activity-based method: For vehicles, the distance and mode for each vehicle type can be multiplied by the applicable emission factor ($kgCO_2e$/passenger.km) from the Government EFs. For hotel stays, the number of nights can be multiplied by the $kgCO_2e$/room per night emission factor from the Government EFs.
3. Spend-based method: Where specific data is not known, then spend data can be multiplied by the applicable emission factor from the relevant SIC sector as described in the Section pm purchased products and services.

Approach Taken for Footprint

Data was available as total annual mileage for each of 'grey fleet' and 'councillor'. This was combined with the Government's EF for an 'average car with unknown fuel' to estimate emissions.

Alternative Categorisation and Mapping

For the alternative categories, emissions from this category should be allocated to:

- Transport > Grey Fleet > *Aggregate Total*

3.3.7 Upstream leased assets

This category has been taken to be out of scope as it is not relevant.

3.3.8 Investments

This category has been taken to be out of scope.

3.3.9 Client and visitor transport

This category has been taken to be out of scope as it is not relevant.

3.3.10 Downstream transport and distribution

This category has been taken to be out of scope as it is not relevant.

3.3.11 Use stage of the product

This category has been taken to be out of scope as it is not relevant.

3.3.12 End of life of the product

This category has been taken to be out of scope as it is not relevant.

3.3.13 Downstream franchises

This category has been taken to be out of scope as it is not relevant.

3.3.14 Downstream leased assets

This category has been taken to be out of scope as it is not relevant. Any buildings that are owned by MDDC but leased to others (downstream) would be accounted for in sections 3.1.1 and 3.2.1 as under financial control reporting and an operating lease, these would be Scopes 1 and 2 respectively.

3.3.15 Employee commuting

Description

This includes transport of employees between their homes and workplaces. This can cover a range of modes but in practice will be mainly driving (either single driver or car sharing) as well as potentially public transport modes and walking/cycling. Also included in this section is 'home working' i.e., emission arising from energy used to heat homes and operate work equipment whilst staff are home working.

Data Hierarchy and Calculation Approach

There are different ways that the data can be reported, for example by site, mode, department etc. and there is potential for a standardised approach to be taken. In the first instance, the lack of specific data is likely to limit any usefulness of more granular categorisation. This is an issue that could be revisited as data quality improves.

The following hierarchy should be followed for data collection (best to worst):

1. Fuel-based method: Where fuel consumption from commuting it known it should be used in the calculations, however this is expected to be generally not applicable.
2. Distance-based method: Organisation-specific data is gathered to establish total distance for each travel mode. This would need to be captured from an organisation travel survey that should be updated on an annual basis. It should establish for each employee the one-way distance from home to the place of work and the annual distance by number of days worked per year commuted by each mode, and assuming a two-way journey each day. This data can then be multiplied by the appropriate modal emission factor ($kgCO_2e$/passenger.km) from the Government EFs. For car sharing it should be assumed that the emission factor for a car ("average car with unknown fuel") is divided by two (assuming typically car-sharing involves two people sharing a journey) and for walking and cycling the emission factor will be zero. In the case of a travel survey 100% coverage of staff will not be possible, and so the results of the survey should be extrapolated to cover all staff.
3. Average-based method: This method can be used when organisation-specific data (i.e., from a staff commuting survey) is not available. Here, details on distance and mode can be estimated from the National Travel Survey [19], and in particular Tables NTS0303(average distance travelled by mode) and NTS0412 (commuter trips by employment status and main mode). This can be combined with staff numbers, number of days worker per year, and the Government EFs to calculate commuting emissions.

To calculate emissions from homeworking, the total number of hours worked at home need to be established e.g., from records or based on proportion of contracted hours worked at home. These can be multiplied by the "Homeworking (office equipment + heating)" emission factor ($kgCO_2e$ per FTE working hour) from the Government EFs. The results can be broken down into sub-categories (e.g., departments) if required, or otherwise aggregated as a single organisational total.

Approach Taken for Footprint

No specific staff travel survey was available. MDDC provided staff numbers as FTE of either 'non-hybrid' and 'hybrid' staff. Non-hybrid were assumed to travel to work every day. Hybrid staff were assumed to work at home for 50% of the time with the rest at their place of work The National Travel Survey provides average annual commuting distances by mode. These were used with the FTE data to estimate total mileage by mode. These were combined with the Government's EFs to establish commuting emissions.

Homeworking emissions were calculated by multiplying the hybrid FTE number by 50% assumed worked at home by annual hours worked (based on 230 days/year, 7.5 hours/day) to establish total annual homeworking hours, and then multiplying this by the Government EF for homeworking.

Alternative Categorisation and Mapping

For the alternative categories, emissions from this category should be allocated to:

- Buildings (exc. housing) > Homeworking Energy > *Aggregate Total*
- Transport > Commuting > *Aggregate Total*

3.3.16 Other indirect emissions not included elsewhere

No other sources of emissions have been identified.

3.4 Offset Carbon

Description

This includes any GHG offsets, for example purchased voluntary offsets, or exported renewable energy.

Data Hierarchy and Calculation Approach

Offset emissions from purchased voluntary offsets will be available directly from the purchase of those credits. Offsets from exported generated electricity can be established as described in Section 3.2.1.

Approach Taken for Footprint

There were no purchased offset carbon credits in this year. Offsetting associated with export of renewable energy and purchase of REGO backed electricity are discussed in Section 3.2.1.

Alternative Categorisation and Mapping

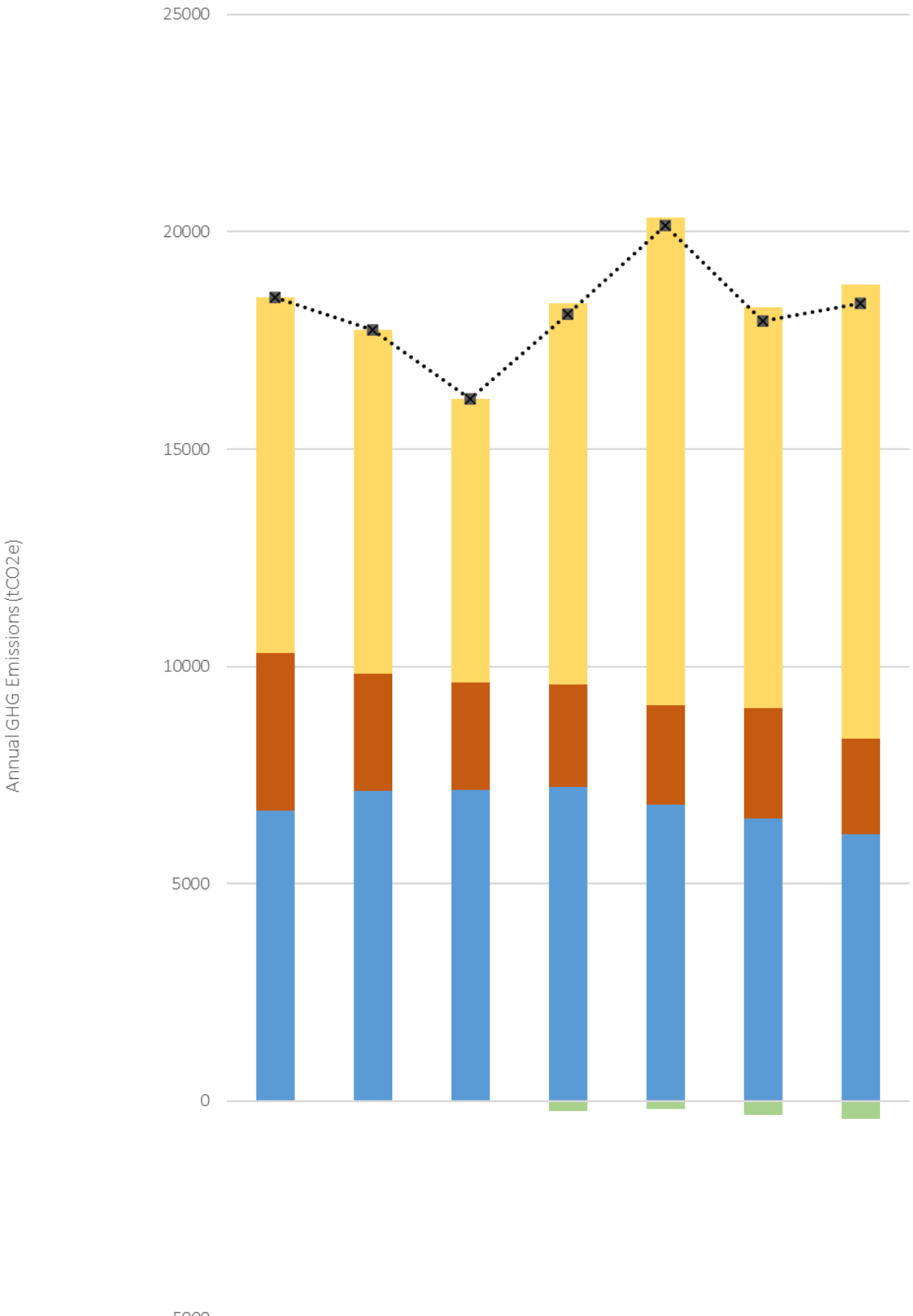
For the alternative categories, emissions from this category should be allocated to:

- Offsetting > Exported Renewable Energy
- Offsetting > Purchased voluntary offsets

4 Results

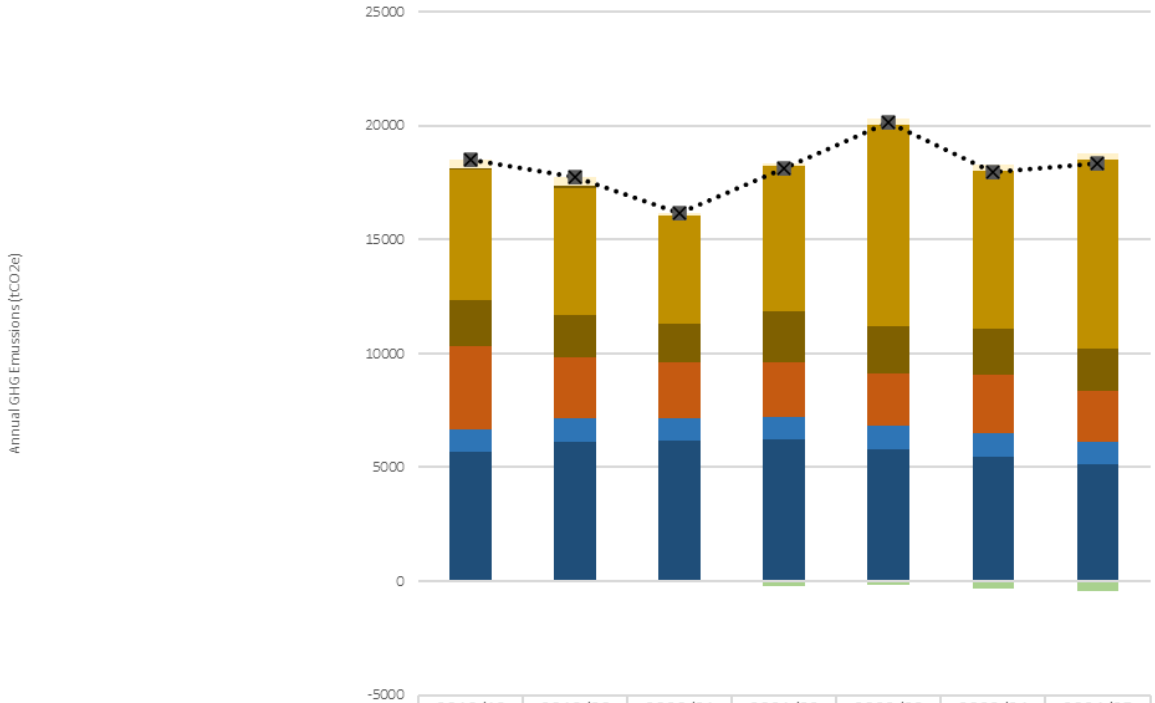
The results of the calculations for the ISO 14064 categories are shown in Figure 2 and Figure 3. The results for the alternative categories are shown in Figure 4 and Figure 5. Total net emissions for the 2024/25 period were 18,364 tCO_2e. Most emissions are Scope 3 (56%) with Scope 1 representing 33% of the total, and Scope 2 accounting for 12%. Net emissions in 2024/25 are 2% higher than in the previous year. Emissions from the alternative categories are broken down as follows:

- Buildings (excluding housing) 1,194 tCO_2e / 6% gross emissions: 41% of these emissions are from the leisure centres with a further 14% from the corporate estate (mainly council offices). Energy used by staff when working from home was estimated to be 6%. Emissions from this category reduced by 113 tCO_2e compared to the previous year, mainly due to switches to ASHPs and GSHPs.
- Social Housing 7,775 tCO_2e /41% gross emissions: Whilst this is the most significant source of emissions within the footprint, it is not based on metered data and MDDC does not have direct control over energy use within these buildings. Emissions from this category decreased by 751 tCO_2e mainly due to a lower assumed energy consumption per dwelling taken from Ofgem typical domestic consumption values. The estimate from this category could be improved in future years by looking to match consumption data for each property using post codes.
- Transport 1,520 tCO_2e / 8% gross emissions: Most transport emissions were from MDDC's fleet, with the majority of these associated with waste disposal. Emissions from this category remained about the same compared to the previous year.
- Procurement 8,295 tCO_2e / 44% gross emissions: Procurement represents a significant proportion of the footprint, of which over half is associated with construction activities. Estimation of emissions from procurement is inaccurate as it is based purely on spend data and coarse emission factors. Focussing on large areas of spend and looking to quantify GHG emissions using specific activity data would improve the quality of the calculations. Emissions from this category increased by 1,370 tCO_2e compared to the previous year, mainly due to increased spend and revised emission factors. Emissions are similar to the 2022/2023 figure.
- Offsets -420 tCO_2e / -2% gross emissions: Offsets are responsible for only a small reduction in overall emissions, with almost all this due to the purchase of REGO backed electricity. Nonetheless, the reduction from these offsets have increased by 29%.



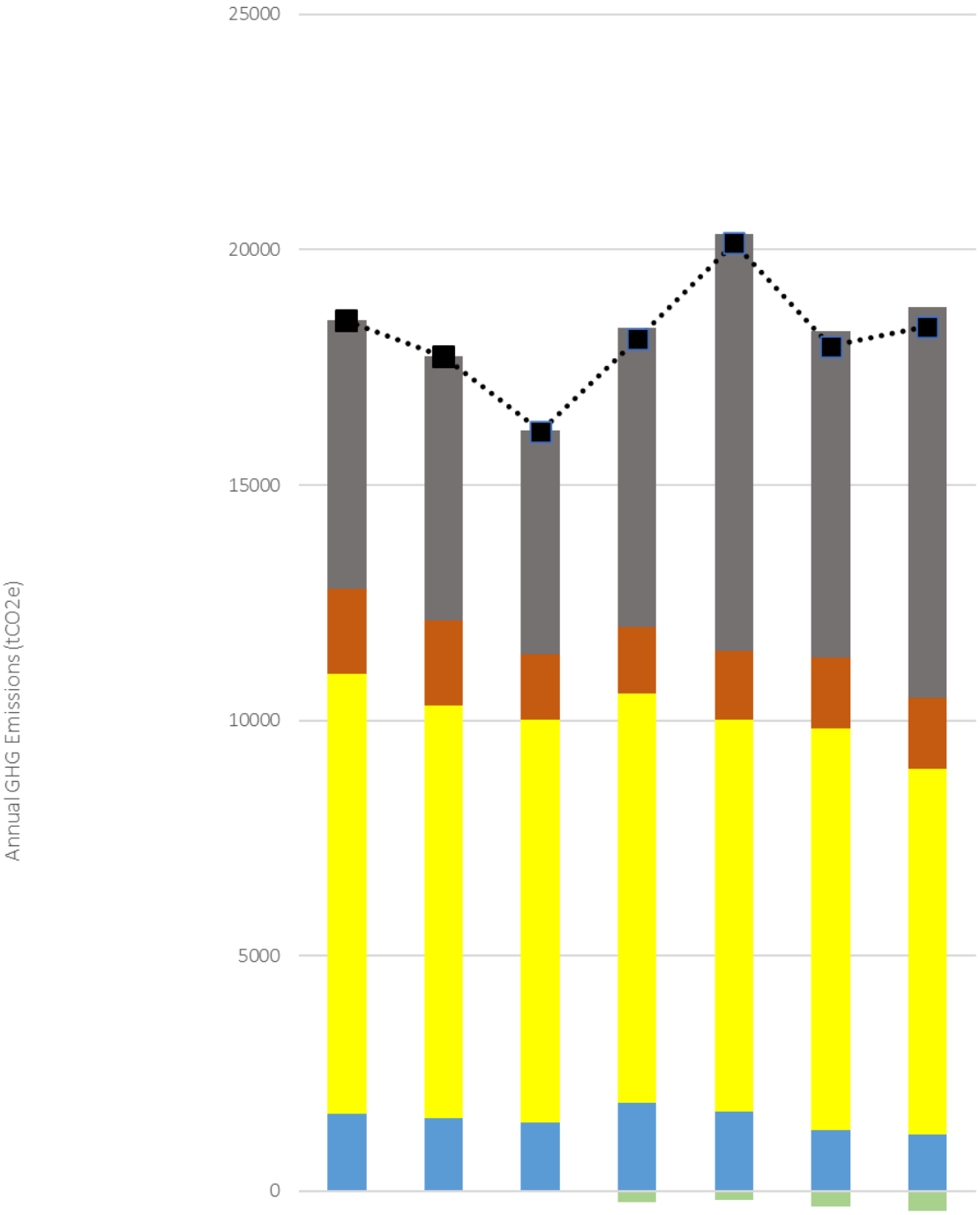
	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25
Offset Carbon	0	-9	-8	-241	-181	-325	-420
Scope 3	8185	7902	6532	8760	11233	9227	10449
Scope 2	3625	2705	2460	2367	2270	2537	2198
Scope 1	6685	7134	7160	7222	6825	6509	6137
GRAND TOTAL (net)	18495	17732	16144	18108	20147	17948	18364

Figure 2: Breakdown of emissions by Scope 1, 2 and 3 from ISO 14064-1



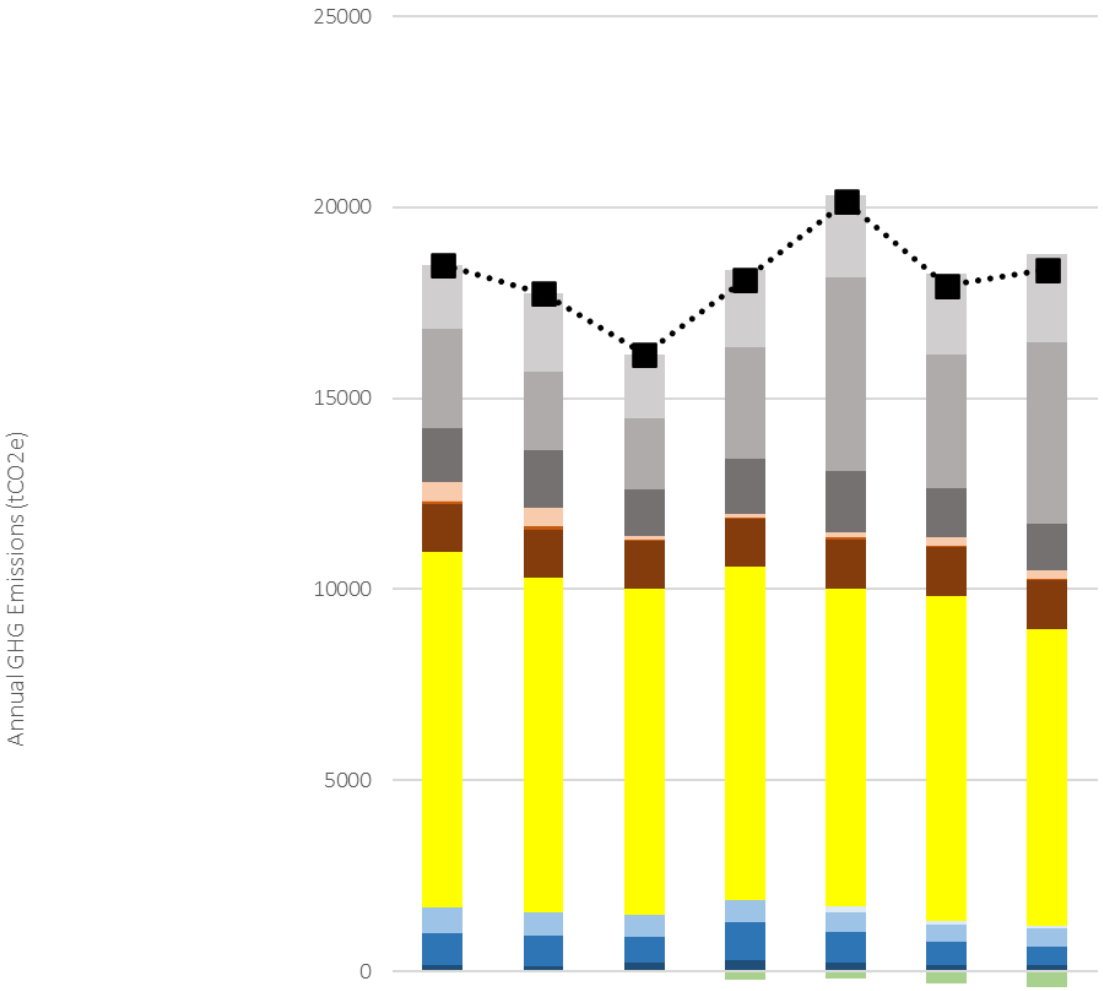
	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25
Offset Carbon	0	-9	-8	-241	-181	-325	-420
Other indirect emissions not included in the other 22 categories	0	0	0	0	0	0	0
Employee commuting	385	385	89	87	262	237	246
Downstream leased assets	0	0	0	0	0	0	0
Downstream franchises	0	0	0	0	0	0	0
End of life of the product	0	0	0	0	0	0	0
Use stage of the product	0	0	0	0	0	0	0
Downstream transport and distribution	0	0	0	0	0	0	0
Client and visitor transport	0	0	0	0	0	0	0
Investments	0	0	0	0	0	0	0
Upstream leased assets	0	0	0	0	0	0	0
Business travel	59	75	8	30	28	27	35
Upstream transport and distribution	0	0	0	0	0	0	0
Waste generated from organisational activities	2	2	2	2	2	2	1
Capital equipment	0	0	0	0	0	0	0
Purchased products	5703	5610	4754	6372	8842	6925	8295
Energy-related activities not included in direct emissions and energy indirect emissions	2036	1830	1678	2269	2099	2036	1872
Indirect emissions from consumed energy imported through a physical network	0	0	0	0	0	0	0
Indirect emissions from imported electricity consumed	3625	2705	2460	2367	2270	2537	2198
Direct emissions and removals from Land Use, Land Use Change and Forestry (LULUCF)	0	0	0	0	0	0	0
Direct fugitive emissions	0	0	0	0	0	0	0
Direct process related emissions	0	0	0	0	0	0	0
Direct emissions from mobile combustion	1016	1003	1016	1008	1048	1025	1012
Direct emissions from stationary combustion	5669	6131	6144	6214	5777	5484	5125
GRAND TOTAL (net)	18495	17732	16144	18108	20147	17948	18364

Figure 3: Breakdown of emissions by detailed sub-category from ISO 14064-1



	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25
5. Offsets	0	-9	-8	-241	-181	-325	-420
4. Procurement	5703	5610	4754	6372	8842	6925	8295
3. Transport	1812	1818	1382	1400	1473	1515	1520
2. Social Housing	9326	8758	8547	8711	8319	8526	7775
1. Buildings (exc. housing)	1654	1554	1469	1865	1694	1307	1194
GRAND TOTAL (net)	18495	17732	16144	18108	20147	17948	18364

Figure 4: Breakdown of emissions by headline alternative categories



	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25
5.4 Purchased Offsets	0	0	0	0	0	0	0
5.3 Land Use Change	0	0	0	0	0	0	0
5.2 REGO Electricity	0	0	0	-241	-178	-323	-415
5.1 Exported Renewable Energy	0	-9	-8	0	-2	-2	-5
4.3 Services	1673	2050	1666	2022	2174	2147	2307
4.2 Construction	2599	2064	1887	2912	5054	3493	4761
4.1 Goods	1430	1496	1201	1438	1614	1285	1227
3.4 Commuting	483	483	112	110	140	208	217
3.3 Business Travel	4	15	0	0	0	0	0
3.2 Grey Fleet	69	79	11	38	35	34	45
3.1 Own Vehicles	1256	1241	1259	1253	1298	1274	1258
2.1 Operational emissions	9326	8758	8547	8711	8319	8526	7775
1.5 Homeworking Energy	0	0	0	0	151	74	76
1.4 Waste from Buildings	2	2	2	2	2	2	1
1.3 Other Non-Domestic	669	612	569	578	529	478	464
1.2 Leisure Centres	835	798	659	1007	778	585	484
1.1 Corporate Estate	148	143	239	278	233	168	169
GRAND TOTAL (net)	18495	17732	16144	18108	20147	17948	18364

Figure 5: Breakdown of emissions by detailed alternative categories

References

[1] British Standards Institute, BS EN ISO 14064-1: Greenhouse Gases - Part 1: Specification with guidance at the organisational level for quantification and reporting of greenhouse gas emissions and removals, 2019.

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Report for:	**Planning, Environment and Sustainability PDG**

Date of Meeting:	23rd September 2025
Subject:	Anaerobic Digesters
Cabinet Member:	Cllr Steve Keable, Planning & Economic Regeneration
Responsible Officer:	Richard Marsh, Director of Place and Economy
Exempt:	N/A
Wards Affected:	All wards
Enclosures:	N/A

Section 1 – Summary and Recommendation(s)

This report discusses options available to Members around the production of further (supplementary) planning policy or guidance in relation to the development and management of Anaerobic Digester plants within the Mid Devon.

It seeks to give consideration to several options, this benefits and disbenefits of each, and makes a recommendation for consideration by the Policy Development Group.

Recommendation(s):

1. Note that planning policy relevant to Anaerobic Digesters is provided through the adopted Local Plan and that further/new policy cannot be introduced through a Supplementary Planning Document (SPD);

2. Ask the Cabinet Member (for Planning and Economic Regeneration) to instruct officers to engage suitably qualified consultants in discussion to determine what could be contained within an advice/guidance note to inform Council work relating to Anaerobic Digester plants, the cost for the production of such an advice note, and the timetable for completion, and;

3. Once complete, ask the Cabinet Member to ensure this information is presented to the PDG for review and consideration prior to making any recommendation to Full Council, via Cabinet.

Section 2 – Report

1.0 Introduction and background

1.1 In July 2025, a Motion (Motion 608) was put before Council, for the first time, by Councillor Gill Westcott. The Motion asked Council to note:

1. That the contribution of Anaerobic Digestor Plants to reduction of greenhouse gas emissions is highly variable;

2. That while digestion of on-farm wastes reduces escape of greenhouse gases from stored plant wastes, slurry pits etc, industrial scale AD processing requires considerable heavy vehicle transport of feedstock to the plant and digestate away from it for spreading on land;

3. That heavy vehicle traffic movements constitute a considerable problem for local residents on single carriageway roads;

4. That research shows that AD plants cannot necessarily be expected to contribute to the reduction of greenhouse gas emissions (only 1/3 of French AD plants studied did so) and so do not necessarily constitute sustainable development.

1.2 The Motion also asked Council to approve that:

"Planning officers to prepare a Supplementary Planning document outlining the conditions under which any further applications for Anaerobic Digestor plants, or the expansion of existing plants, would be acceptable and contribute to goals for climate change mitigation; and what planning conditions might be required be to ensure that this contribution is realised."

1.3 An amendment was then tabled by Councillor Westcott, seconded by Councillor Fish, that the Motion be referred to this PDG (the Planning, Environment and Sustainability PDG) for review, prior to it going back to Full Council for further review and/or vote.

1.4 A vote was taken upon the amendment, which was carried, and so this matter is now before this PDG for further consideration.

1.5 Members will also be aware that Public Questions were also raised in relation to this item and that members of the public have raised questions

regarding the development and operation of Anaerobic Digester (AD) plants in the District on previous occasions.

2.0 Background

2.1 Anaerobic Digesters are facilities which use plant and/or animal material in order to generate gas. This gas is then used to generate heat and/or power which can either be used directly (on site) or exported (i.e. via the electricity grid) to power or heat other homes/premises and installations.

2.2 Anaerobic Digesters have been the topic of various discussions and reports in Mid Devon in the past, most recently in October 2024 when a report regarding the number of facilities in Mid Devon was produced for the Scrutiny committee.

2.3 Control and management of Anaerobic Digester facilities falls across and interfaces with various Council departments and across other agencies such as the Health and Safety Executive (HSE) and Environment Agency (EA).

2.4 Mid Devon's Planning service has a role relating to Anaerobic Digesters both in terms of Development Management (considering applications against national, regional and local planning policy) and in terms of Planning policy (developing policy which works in the context of national policy and in supporting determination of planning applications at a local level.)

2.5 Planning enforcement is also utilised in the management of AD facilities, especially where breaches of planning permissions are suspected or identified. Planning enforcement activity has occurred in relation to AD plants within the District in the recent past.

3.0 Current planning policy position

3.1 The Council determines planning applications for Anaerobic Digesters on a case by case basis, based upon the information set out within each application and with reference to relevant planning policy and in consultation with stakeholders and consultees.

3.2 In the case of determining applications against local Planning Policy (contained within the adopted Local Plan), several policies are relevant, including (amongst others):

- Policy S1 – Sustainable Development Priorities;
- Policy S14 - Countryside, and;
- Policy DM2 – Renewable and low carbon energy.

3.3 In some cases, where the main 'feedstock' for the plant is a waste product, it may be more appropriate for the Planning Authority to be the County Council rather than the District Council. This is because Devon County Council is the Authority responsible for the management of Waste in the County.

3.4 The Council is unable to introduce new planning policy under the adopted Local Plan. It can only seek to further clarify or develop policy and guidance which is in-line and consistent with adopted planning policy.

3.5 Any new, local planning policy would need to be introduced through the next Local Plan (Plan Mid Devon) which is currently in development but which is still some way from completion and adoption.

3.6 The Council is therefore limited in what it can do in terms of introducing additional planning policy to support the determination of planning applications relating to AD plants.

3.7 It should also be remembered that AD plants are also subject to a raft of other permits and legislation which means that the planning process only has limited control over their consenting and operation. It should also be noted that the Council has no resource (human or financial) allocated to progress any work and significant work pressures on limited staff to deliver existing, committed work – this should be considered in any future recommendations.

4.0 Options available to the Council

4.1 With the above in mind, the Council has four options available to it when considering whether and how to develop additional policy/guidance to support decision making around, and management of, AD plants:

1. **Option 1** – Continue to rely on existing planning policy alone;
2. **Option 2** – Develop a further Supplementary Planning Document specific to AD plants and refining and consolidating existing policy;
3. **Option 3** – Develop a broader AD advice note which, whilst not an adopted Planning document, could provide consolidated advice across all matters relating to AD plants (not just planning) and provide a useful tool for officers, elected members and members of the public. Or;
4. **Option 4** – Do not develop any further guidance or policy in the short term and instead look to address the issue through the new Local Plan (Plan Mid Devon), noting that this will take time.

4.2 A discussion of the benefits and dis-benefits of each option is set out below.

4.3 **Option 1**: this would effectively be a continuation of the current situation whereby applications are judged against existing planning policy (local,

regional and within the national context) and cases are determined on a case by case basis. The benefits of this approach would be that no additional guidance or policy needs to be developed, creating no financial or resource pressure for the Council. The disbenefit of this approach would be that it fails to deliver develop the Council's understanding of, or position around, AD plants and fails to respond to continued elected member and public interest in the matter.

4.4 **Option 2:** This would involve the development of a Supplementary Planning Document (SPD) to build on existing planning policy, in line with the original Motion. This document would necessarily need to be informed by existing policy and it could not introduce additional/new planning policy. The document would therefore be likely to have to be predominantly focused on the provision of further guidance to applicants. The benefits of this approach are that elected Members and officers would have an additional and specific policy to reference and that it would, at face value, respond to public aspirations for additional guidance. However, the disbenefits and short-comings in this approach are significant and include that fact that;

1. The document would likely offer very little additional policy in order to support planning application determination;
2. No officer capacity exists to lead or manage this work – the current Forward Planning team already being reduced in capacity and wholly occupied on the delivery of the new Local Plan;
3. No funding being identified to support the required work – particularly relevant where limited internal capacity means that external resource would need to be utilised to produce the document, and;
4. A procurement exercise would need to be completed in order to procure external consultants – again reliant upon internal resource – resulting in time delay before the work could be commenced.

4.5 The factors combined mean that the external commissioning and production of any SPD document would likely take circa 12 months and could be anticipated to cost the Council up to £10k. In light of this, it is not an option which is recommended given the limited additional benefit that will accrue from the work.

4.6 **Option 3:** This would involve the production of a summary document which would not be Planning Policy in the formal sense, but could be a summary document of key guidance, advice and legislation relating to Anaerobic Digester plants. This could be accessed by officers, members of the public and applicants/operators and, where appropriate, could support in the consideration and determination of planning applications (likely also informing planning conditions), also support activity across other Council functions. There may also be scope to procure and develop this in conjunction with other

Local Authorities. Again, resource and expertise does not exist within the Council to produce this work, so an external consultant would need to be identified and procured to deliver the work and it would create some additional work load pressures in procuring any consultant(s).

4.7 The benefits of this approach would be that the Council would have a useful and usable document to support work relating to Anaerobic Digester plants, the document should be quicker and easier to produce (or source) and the cost should therefore also be lower. The disbenefit of this would be that the document would not be a formal planning policy document and would therefore in itself carry no policy weight and that, despite the benefits of this option, the Council still has no funding or staff currently allocated to support this work and its progression will still therefore draw staff and financial resource from other projects.

4.8 Despite this shortcoming, officers consider that this (Option 3) might produce the most useful document in a manner which is both time and cost effective and best address ongoing public and member interest in the matter. It is therefore the recommended option if Members do feel that it is necessary to produce an additional document and are happy to accept implications of this in terms of potential to impact on other, existing work commitments.

4.9 **Option 4:** would be not to progress with any work in the short-term (guidance/advice or an SPD) and to instead look to address the issue through the new Local Plan.

4.10 Whilst this approach is, in some ways, the most logical course of action, it does come with several disbenefits. Notably; the work is not currently identified as a specific task in the production of the new Local Plan (being likely to feature as part of a wider sustainability/energy workstream); it would place additional burdens on an already depleted team and, most notably, it would mean a significant delay in the production of any further advice/guidance/policy. For this reason it is considered that it does not meet the needs or aspirations of elected members or the public and it is not a recommended option.

5.0 Recommendation

5.1 With the above in mind, Option 3 (the production of a summary guidance/advice document covering relevant matters relating to AD plants) is considered to be the ‘best’ option to progress – if Members are content to accept potential cost/work impacts.

5.2 However, before a final recommendation is made to members based on Option 3, it is recommended that this PDG ask the Cabinet Member to instruct

officers to undertake further work to scope any summary guidance/advice document. It is expected that this will;

1. Further refine the scope and content of any advice/guidance document (and assess the 'value' of this to the Council's work);
2. Determine whether other documents already exist which could be utilised, developed or refined by this Council to meet our requirements;
3. Determine whether the work could be commissioned with other/neighbouring authorities;
4. Identify consultants/advisers who may be able to undertake the work on behalf of the Authority and discuss/refine the draft scope with these consultants to ensure its robustness, and;
5. Determine an approximate cost for the work and a likely timetable for production.

5.3 Once this exercise is complete and information secured, it is recommended that the Cabinet Member be asked that this be brought back to this PDG for further discussion prior to any final recommendation being made in response to the original Motion.

Financial Implications

As the report sets out; no financial or staff resource exists to support this work and members need to consider this when selecting any course of action. The production of any guidance or policy will therefore place further demands on existing staff (likely resulting in delays to other work) and will demand that funding is drawn from other budgets. It is however believed that the cost of production of the document could be covered from within existing Forward Planning budgets.

Legal Implications

There are no direct legal implications arising from this report but further legal input will be required as options are refined and as any work is completed.

Risk Assessment

There are no major risks are associated directly with this report. Reputational risk does exist in terms of ongoing public concern around the development and operation of AD plants within the Devon geography and so it is important that members of the public can see that the Council is continuing to take these concerns seriously and is continuing to act in the best interests of the public (at large.) Undertaking a focused piece of work to support the Council in general dealings with AD plants may therefore provide further public assurance and ensure that reputational risk is minimised.

Impact on Climate Change

AD plants have significant scope to create climate/carbon implications and other environmental impacts – potentially both positively and negatively. Planning applications have to be determined based upon individual cases and with national,

regional and local planning policy in mind. However, in developing any further policy or guidance, careful consideration will need to be given to Climate matters and consideration given to how any advice or guidance deals with, or comments on, these matters.

Equalities Impact Assessment

No Equalities issues are considered to arise from this report, but a further review should be undertaken at the time of the next report in order to consider how any decision may create Equalities impacts and what mitigations/measures can be put in place to address and overcome these.

Relationship to Corporate Plan

This work would not be core to the Corporate Plan, but could support wider Corporate Plan ambitions and objectives. It should however be noted that progression of this work also has the potential to delay other work (such as the production of the new Local Plan), which could be contrary to other Corporate objectives, ambitions and targets. Careful consideration of the work will therefore need to occur to ensure that the Council is continuing to deliver on objectives and meeting the objectives of the organisation and needs of residents/businesses as effectively and efficiently as possible.

Section 3 – Statutory Officer sign-off/mandatory checks

Statutory Officer: Andrew Jarrett
Agreed by or on behalf of the Section 151 Officer
Date: 12 September 2025

Statutory Officer: Maria De Leiburne
Agreed on behalf of the Monitoring Officer
Date: 12 September 2025

Chief Officer: Stephen Walford
Agreed by Chief Executive
Date: 12 September 2025

Performance and risk: Stephen Carr
Agreed on behalf of the Corporate Performance & Improvement Manager
Date: 15 September 2025

Cabinet member notified: yes

Section 4 - Contact Details and Background Papers

Contact: Richard Marsh, Director of Place and Economy
Email: rmarsh@middevon.gov.uk
Background papers:

Report for:	**Planning, Environment and Sustainability PDG**
Date of Meeting:	23rd September 2025
Subject:	Summary report on Planning matters
Cabinet Member:	Cllr Steve Keable, Planning & Economic Regeneration
Responsible Officer:	Richard Marsh, Director of Place and Economy
Exempt:	N/A
Wards Affected:	All wards
Enclosures:	N/A

Section 1 – Summary and Recommendation(s)

This report provides a summary of activity undertaken in relation to planning matters during the last quarter.

Recommendation(s):

1. That Members note the contents of the report.

Section 2 – Report

1.0 Introduction

This report seeks to provide Members with updates across a range of matters relating to Planning and Building Control.

2.0 Updates

2.1 New National Planning Policy Framework (NPPF):

2.1.1 Previous reports have outlined that further to the release of the latest iteration of the NPPF in December 2024, it remains expected that the Government will consult on a national set of 'core' development management (DM) policies. Officers have also received various informal updates to confirm that the publication of further information was 'imminent'. However, no announcements have yet been made with regard to the policies and so no further update can be provided at this time.

2.2 New Local Plan: Plan Mid-Devon

2.2.1 Work to develop the new Local Plan (Plan Mid Devon) continues – albeit there is an important link to the announcement on national development management policies.

2.2.2 The Local Plan team has also appointed an interim officer (consultant) to support work on the new Local Plan whilst recruitment of permanent staff continues. This officer brings a wealth of experience and is already contributing to the work of the team.

2.2.3 The team has also appointed two planning assistants, who will also add additional capacity to the team. Unfortunately, recruitment to the Forward Planning Officer and Principal Forward Planning Officer has been less successful and no appointments to these roles were made after the last round of recruitment. A further round of advertisement is now underway in the hope that recruitment might be more successful during September/autumn.

2.3 Development Management Policies

2.3.1 The Blackdown Hills National Landscape Management Plan was adopted at the 8th July Cabinet meeting.

2.3.2 The EUE (Area B) masterplan was also noted at the September Cabinet meeting. Although developments on Area B will still be bound to adhere to the adopted Tiverton EUE Master Plan SPD, this Area B masterplan will support the progression of development proposals for this area of the EUE allocation.

2.3.3 The Council is required to renew its Infrastructure Funding Statement and publish it online by 31st December 2025. This document is refreshed annually and details what the Council expects to fund, or contribute towards, using S106 funds. A review of the Infrastructure Funding Statement is currently being undertaken shortly ahead of its presentation to Cabinet for approval

prior to publication. The previously published statement can be found on the Council's website here.

2.3.4 The Infrastructure Funding Statement (and Infrastructure list) can only include items where a policy basis exists to support a contribution towards the cost of delivery. However, Members are invited to review the list to ensure that all items are included. This will help ensure the list has been fully and rigorously reviewed. The list will then be subject to a more detailed review and discussion through the Planning Policy Advisory Group (PPAG) ahead of presentation to Cabinet. The PPAG meeting is scheduled for October.

2.4 Development Management

2.4.1 Members will be aware that some staffing changes are occurring within Development Management with the departure of the former permanent DMM and one of the Principal Officers. It is expected that the interim DMM will remain in post whilst a permanent solution is implemented and recruitment is underway in relation to the PPO role.

2.4.2 Performance within Development Management remains strong with 100% of householder applications determined within 8 weeks and 0.5% of minor applications overturned at appeal. (Q1 2025/26 data.)

2.4.3 However, Q1 income is below trajectory for the years (£167k versus £835k target). This financial picture does reflect the wider market sentiment and macro-economic conditions with housebuilders, contractors and other Local Authorities also experiencing a downturn in sales/contracts and applications.

2.5 Building Control

2.5.1 Building Control (a shared function with North Devon Council) continues to perform well, albeit with continuing resourcing challenges and pressures accruing through changes introduced through the Building Safety Act (2024).

2.5.2 Q1 data showed 100% approval of full applications within 2 months (versus 95% target and 97% achieved in Q3) and continuity of a strong market share (85% versus 75% target and 82% in Q4 2024/25.) Market share of new housing completions has picked up versus Q4 data (31% vs. 17%) but remains below target (40%) and is highly dependent upon the nature of developers active within the market.

2.5.3 Applications numbers are down, and are below the same period last year, and income is also therefore below target. Again – akin to Development Management - this is reflective of a depressed housing market and low confidence within the construction/development sector as a whole. Poor trading conditions seem likely to continue.

2.6 Planning Enforcement

2.6.1 The Enforcement services continues with a high/active case load albeit there continues to be churn/change in the live cases as new cases are presented and officers close older/completed cases.

2.6.2 The service continues to operate with two officers (a contractor and an assistant enforcement officer.) Multiple attempts have been made to recruit a senior enforcement officer, including with market supplements applied. Further consideration is being given as to how a permanent officer might be secured.

2.6.3 In addition to this, planning officers continue to support with the resolution of live cases in order to seek to manage and reduce the case-load.

Financial Implications

Financial implications associated with this report are limited – but members are asked to note points relating to financial performance and other implications of matters.

Legal Implications

There are no legal implications arising from this information report.

Risk Assessment

There are no major risks associated with this report.

Impact on Climate Change

The scope of this PDG means it has a significant opportunity to progress positive work around climate, biodiversity and other environmental/sustainability matters. Officers will work to seek to support the PDG in maximising these opportunities.

Equalities Impact Assessment

No negative equalities impacts are expected.

Relationship to Corporate Plan

The work of this PDG will supports a wide range of corporate objectives and the corporate plan as a whole.

Section 3 – Statutory Officer sign-off/mandatory checks

Statutory Officer: Andrew Jarrett
Agreed by or on behalf of the Section 151 Officer
Date: 10 September 2025

Statutory Officer: Maria De Leiburne
Agreed on behalf of the Monitoring Officer
Date: 10 September 2025

Chief Officer: Stephen Walford
Agreed by Chief Executive
Date: 10 September 2025

Performance and risk: Stephen Carr
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Cabinet member notified: yes

Section 4 - Contact Details and Background Papers

Contact: Richard Marsh, Director of Place and Economy
Email: rmarsh@middevon.gov.uk
Telephone:

Background papers:

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