

Report to: Environment Committee, 7th November 2023

Report of: Corporate Director - Operations, Homes and Communities

Subject: IMPLICATIONS OF THE ENVIRONMENT ACT 2021

1. Recommendations

1.1 To note the contents of the report and the ongoing work to ensure compliance with the Environment Act 2021; and

1.2 To approve the draft 'first considerations' biodiversity duty action plan outlined in Appendix A.

2. Background

2.1 The Environment Bill was put before the House of Commons in the 2019-20 parliamentary session, receiving Royal Assent in November 2021.

2.2 The Environment Act 2021 operates as the UK's new framework of environmental protection. The Act sets out the legal framework for significant reforms to local authority waste and recycling services, as well as creating new statutory duties for local authorities on nature recovery ([LGA – Get in on the Act: The Environment Act 2021](#)).

2.3 Part of the Act was to establish the new Office for Environmental Protection (OEP), which incidentally chose Worcester for its office location. The OEP is an independent, domestic watchdog, with enforcement functions over public authorities which fail to comply with environmental law.

2.4 This report focuses on the implications of the Act for the Council. Specifically with regard to

- The Council's work on biodiversity,
- Biodiversity Net Gain – implications for the local planning authority
- Biodiversity Net Gain – biodiversity units & the duty imposed on developers
- The Biodiversity Duty on local authorities
- Conservation Covenants
- The Local Nature Recovery Strategy
- Proposed changes to local authority waste and recycling services including food waste collections.

3. City Council biodiversity

3.1 The Council declared a biodiversity emergency in September 2020, and agreed:

- Strategies and plans to be formulated in conjunction with the declared Climate Emergency.

- Prioritisation of sustainable land management, sympathetic to wildlife.
 - Prevention of wildlife habitats being unnecessarily destroyed.
 - Creation and care for wildlife-rich spaces, in every part of the city and across the region.
- 3.2 Prior to the Environment Act 2021, as a local authority, the council's statutory duty was to 'have regard to conserving biodiversity' under the Natural Environment and Rural Communities Act 2006.
- 3.3 The Council's Environmental Sustainability Strategy, adopted by members in 2020, included biodiversity under the Natural Environment theme, but this was not a primary focus of the strategy.
- 3.4 Following the Council's decision to declare a biodiversity emergency, a Biodiversity Action Programme was developed. This was agreed by Environment Committee in November 2021 and an initial sum of £20,000 from the Environmental Sustainability Enabling Budget was put aside to fund the actions within the programme. Two years later, most of the actions on this are now complete.
- 3.5 The Action Programme focusses on the Council's own land. An update on the programme is included within the Sustainability Action Plan report also on the agenda for this committee.
- 3.6 The Action Programme was intended to support and complement the work of the Worcestershire Biodiversity Action Plan, which was led and managed by Worcestershire County Council and previously was the primary document to identify local priorities for biodiversity conservation and work to deliver agreed actions and targets for priority.
- 3.7 It is clear that partnership working is vital and biodiversity improvements could be made by working more closely with partners, including landowners such as Network Rail and the University, charities such as the RSPB and community groups such as the Worcester Environment Group who actively working to improve habitats across the city and engage residents with the nature on their doorsteps.
- 3.8 [Cambridge City Council's Biodiversity Strategy 2022-2030](#) illustrates the role of the council in biodiversity work across the city and this is a potential model which this Council could adopt as illustrated below:



- 3.9 The Council is responsible for 24 conservation sites over 37 parcels of land, covering 260 acres in total. Eight of these sites have Local Nature Reserve status and one (Lyppard Grange Ponds) is a Site of Special Scientific Interest and a Special Area of Conservation. The Council therefore has an ongoing and key role in nature conservation. In addition to these sites, the Council also manages significant amounts of other land which can support biodiversity, including parks, road verges etc. Recently, new biodiversity management plans are being drafted for the operatives working for City Services in different areas of the city.
- 3.10 As outlined in the Environmental Sustainability Strategy, leadership and ensuring strong partnership working is a key role for the Council. It is possible that the Council could convene a biodiversity summit similar to the sustainability summit held in 2022, subject to including this within the work programme and available resources.
- 3.11 It has been recognised that the Council would benefit from a Tree Strategy and the Planning Service has recently recruited a Trees Officer to undertake this. This Tree Strategy could then link into a wider Biodiversity Strategy for the city. The Tree Strategy should set out a vision for the local treescape ([Tree Council Tree and Woodland Strategy Toolkit](#)). An Ash Dieback Action Plan is also under development: with ash dieback well established in the city and losses of trees in several locations expected, this could have impacts on biodiversity in those areas.

4. Biodiversity Net Gain – Planning

- 4.1 Biodiversity net gain (BNG) is a Government strategy to develop land and contribute to the recovery of nature, by placing a condition for enhancing biodiversity by 10% on planning permissions. As set out in part six of the Environment Act 2021, it is a way of making sure the habitat for wildlife is in a better state than it was before development.
- 4.2 In September 2023, the Government announced the delay to the start of the mandatory minimum 10% BNG. Originally due to come into effect for new applications for planning permission for major developments in November 2023 it is now confirmed this will begin from January 2024. Minor applications must deliver this 10% net gain requirement from May 2024.
- 4.3 Legislation to bring in these rules is expected in November 2023, alongside a package of BNG guidance for local planning authorities.
- 4.4 A developer must first look to deliver the mandatory biodiversity net gain of 10% either on-site or off-site. Local authorities will be able to use their own land to offer offsite biodiversity units to developers. If developers cannot deliver BNG through onsite or offsite options – and the developer can provide evidence of this to the Local Planning Authority– then they may buy a statutory biodiversity credit ([Defra – Preparing the Market for Statutory Biodiversity Credits](#)).
- 4.5 Further information on offsite biodiversity units is in section 5 of this report.
- 4.6 It is expected that around 100 major and minor planning applications made to this Council per annum will need to comply with the biodiversity net gain requirements.

- 4.7 Defra has established a biodiversity metric to assess sites and plans for net gain of biodiversity. This metric is based on habitat type and condition. The metric does not consider the presence (or lack) of species, expecting that if the habitat is present and of a good condition, the expected species will be present.
- 4.8 The biodiversity metric can be used by developers to assess the biodiversity unit value of an area of land, demonstrate biodiversity net gains or losses in a consistent way, measure and account for direct impacts on biodiversity and compare proposals for a site.
- 4.9 Assessment of the applications based on the biodiversity metric by a local planning authority (LPA) has to take place via a 'suitably qualified professional'. This is likely to be an ecologist.
- 4.10 Validation of the planning applications with BNG Metric will be a desktop exercise for which officers will require some additional training. Under the pre-commencement condition, the developers' biodiversity net gain plan must be approved by the LPA before development can begin.
- 4.11 The Environment Act states that significant increases from the on-site pre-development biodiversity value should be secured for at least 30 years. The legislation does not define 'significant'. Government will define the threshold for significant on-site gains in guidance and the application of this guidance will be a matter for each LPA to consider ([Planning Advisory Service: BNG FAQs](#)).
- 4.12 Defra has outlined a number of key actions which local authorities should consider taking, alongside a more detailed checklist ([10 actions LPAs can take to prepare for BNG, Defra](#)):
- Consider how BNG joins up with other local policy priorities.
 - Get to know the Biodiversity Metric and guidance.
 - Consider how to include BNG requirements in your local plan.
 - Publish local habitat creation and enhancement priorities.
 - Consider being an enforcing body for on and off-site gains.
 - Assess whether you want to sell to the off-site biodiversity market and/or be a broker - the off-site biodiversity market offers an opportunity for you to gain additional income and help contribute towards Local Nature Recovery Strategies (LNRS).
 - Make sure the whole organisation knows about BNG.
 - Consider investing in local ecology and planning expertise to provide capacity and maximise local place making and nature improvement opportunities.
 - Engage with other organisations considering biodiversity net gain.
 - Consider how actions to prepare for biodiversity net gain contribute to the Council's biodiversity duty.
- 4.13 A number of planning applications have been submitted with BNG assessments, in order to show 'measurable gains' in accordance with the NPPF. These have been assessed by the Council's Landscape Officer. Given the low threshold these have not been a high level of scrutiny as only a measurable gain needs to be shown.
- 4.14 The risk for the Council is not having available expertise to confidently discharge the pre-commencement planning condition, by assessing the Biodiversity Net Gain Plan. The Council needs to ensure that the input data given by the developers is accurate.

4.15 Funding for increasing capacity and skills to undertake these new requirements for mandatory BNG has been provided to local authorities by central government.

4.16 Training will also be required for planning committee members to understand the evidence which will be provided and the questions which should be asked of this.

5. Biodiversity Net Gain – off site biodiversity units

5.1 As mentioned in 4.4, if a developer cannot provide the necessary biodiversity net gains on-site of the development, then they can purchase off-site biodiversity units.

5.2 The Council could look to sell biodiversity units in respect of its own land. Selling biodiversity units would be an opportunity for the Council to gain funding for specific habitat improvements on specific sites.

5.3 Offsite lands used for BNG must be registered on the biodiversity gains site register, measured using the standardised biodiversity metric and legally secured and maintained for at least 30 years. S106 agreements or conservation covenants will be used for this.

5.4 Local authorities will not be able to direct developers to purchase biodiversity units from them in preference to other ecologically equivalent suppliers and will be expected to manage any associated conflicts of interest (local.gov.uk).

5.5 In order to consider this, it will be necessary to establish the biodiversity baseline for the Council. Currently, we do not have mapping showing habitats and their condition across the city.

5.6 This biodiversity baseline data will be used in order to assess and model off-site BNG unit provision for the Council estate and map our BNG off-site opportunities. This will formulate the basis of a strategy for the Council to approach the sale of biodiversity units.

5.7 Other local partners and landowners may become 'unit providers' and discussion will be held with these to ensure a coordinated approach where possible.

5.8 Off-site biodiversity units should not be referred to as credits, to avoid confusion with the statutory credits scheme. Statutory credits can only be purchased from Defra and are a 'last resort' option for developers if they cannot deliver the BNG they need onsite or via purchasing off-site biodiversity units.

5.9 National 'habitat bank' schemes are being established for developers to purchase biodiversity units from.

5.10 Once the legislation is published setting out the full details of biodiversity units and the opportunities for local authorities, then a strategy on the Council's approach will be developed and presented to this committee for approval.

6. Biodiversity Duty

6.1 The Environment Act 2021 introduces a strengthened 'biodiversity duty'. Public authorities who operate in England must consider what they can do to conserve and enhance biodiversity in England.

6.2 The strengthened duty means that the Council must ([Complying with the biodiversity duty](#)):

- Consider what it can do to conserve and enhance biodiversity.
- Agree policies and specific objectives based on that consideration.
- Act to deliver those policies and achieve those objectives.

6.3 Public authorities must complete their first consideration of what action to take for biodiversity by 1 January 2024. Authorities must agree policies and objectives as soon as possible after this.

6.4 A draft action plan that fulfils this requirement for first consideration is included at Appendix A to this report.

6.5 For local authorities and local planning authorities, the end date of the first reporting period should be no later than 1 January 2026.

6.6 After this, the end date of each reporting period must be within 5 years of the end date of the previous reporting period.

The report is a chance to communicate how the organisation is helping to improve the environment and show positive change being made.

7. Conservation Covenants

7.1 Conservation Covenants are a proposed new agreement which can be made between a landowner or long-term leaseholder and a designated "responsible body"¹. A Conservation Covenant will be a private, legally binding, voluntary agreement.

7.2 A "responsible body" (RB) may be a conservation charity, public body (including local authorities) or for-profit body with conservation as a core purpose.

7.3 Conservation Covenants can be used for the purposes of the conservation of nature or heritage on that piece of land and must be for the public good.

7.4 Covenants may be made:

7.4.1 to conserve the natural environment of land or the natural resources of land,

7.4.2 to conserve land as a place of archaeological, architectural, artistic, cultural or historic interest, or

7.4.3 to conserve the setting of land with a natural environment or natural resources or which is a place of archaeological, architectural, artistic, cultural or historic interest.

7.5 Covenants can last in perpetuity or for a specified time period.

¹ [Getting and using a conservation covenant agreement - GOV.UK \(www.gov.uk\)](#)

8. Local Nature Recovery Strategy

- 8.1 The Act requires the preparation and publication of Local Nature Recovery Strategies. The spatial strategies are to help reverse the decline in biodiversity and will map the most valuable existing areas for nature, agree priorities for nature's recovery, and map specific proposals for creating or improving habitat for nature and wider environmental goals.
- 8.2 Worcestershire County Council are leading on the development of a Local Nature Recovery Strategy for the county and are therefore the 'responsible authority' for the purpose of this work.
- 8.3 The City Council are considered as a 'supporting authority' and the Government has set out the expectations for a responsible authority on engaging with supporting authorities:
- 8.4 The role of supporting authorities, established in regulations, will be critical to driving collaborative working and promoting consistency between local nature recovery strategies. Responsible authorities will have to take all reasonable steps to involve supporting authorities in strategy preparation and seeking their support before consulting on or publishing their local nature recovery strategy. (Copied from [Local nature recovery strategies: the preparation process and contents](#), March 2023).
- 8.5 Members of the Sustainability team have been involved in the LNRS development process to date.

9. Waste & Recycling

- 9.1 Part 3 of the Environment Act 2021 focusses on 'Waste & Resource Efficiency' and seeks to implement policies at every stage of the product lifecycle to move towards to a more circular economy.
- 9.2 The context of this section of the Act as set out by the Government is that '*material resources are at the centre of the UK economy and are consumed in large quantities. They enable human needs to be met, they generate economic growth and create social value. Use of resources has become unsustainable however, causing damage to the natural environment and contributing to climate change*'.
- 9.3 The Act has set out that it will deliver the following key elements:
 - **Extended Producer Responsibility (EPR)** meaning that producers of packaging waste will be made to pay 100% of cost of disposal. It was originally intended for phase 1 of the scheme to only apply to plastic packaging. Although detail of the scheme is yet to be published it is expected that it would result in direct payments being made to local councils. The scheme was due to commence in October 2024, but during the Summer the Government announced the scheme had been deferred to October 2025.

Linked to EPR is the requirement to increase the range of dry recyclables accepted to include aluminium foil, trays and tubes by March 2026 (i.e. by the end of the financial year in which payments to local authorities for packaging materials under EPR will commence).

- A **Deposit Return Scheme (DRS)** which will require a small cash deposit to be placed on single use drink containers. Detail on the scheme to date suggests that the scheme would include reverse vending machines and designated sites where people would return their bottles and receive their cash back. Initially planned to commence in October 2024, the Government announced during Spring the scheme would not be rolled out until 2025 at the earliest.
- A **charge for single use plastics** would enable the Government to apply a charge to single use items which are made wholly or partly of plastic, and any other single use item. In practice this is an extension of the legislation in place, and which applies to charging for single use carrier bags.
- **Increased consistency of recycling collections.** Aimed at reducing the confusion in the materials that can be collected for recycling at the kerbside, the Act proposes that councils should be required to collect a core set of dry recyclables, with local discretion around how that is achieved.

How recycling is collected - Councils retain local discretion about how recycling services are provided. Commingled services can continue, and it is recognised that high recycling rates can be achieved through a commingled service. This is likely to be supported by the provision of an exemption to allow all dry recyclables (paper and card, plastic, glass and metal) to be collected together in one recycling bin.

Additional materials to be collected for recycling - In addition to the materials the council already collects, by March 2026 - aluminium foil, trays and tubes will be required to be accepted and by 2027 - soft plastics and microfilms.

Frequency of residual waste collections - The government intends to consult on a statutory requirement for councils to collect residual waste at least fortnightly. There is a private consultation with a select number of local authorities currently underway (21st October – 20th November 2023). The government encourages more frequent residual waste collections and considers the minimum fortnightly standard as a backstop. No requirements set out regarding bin size for residual waste.

Garden Waste - Councils can continue to charge for garden waste collection with all householders choosing whether to use the service or make other arrangements.

Food Waste Collection and funding - Food waste collection to be introduced to all properties including flats by March 2026. DEFRA have secured £295 million for capital funding (vehicles and containers). It is understood that this will be allocated to LAs this financial year with payments based on modelled costs. Government will provide local authorities with funding to meet agreed reasonable new burdens arising from this policy, including up-front transition costs and ongoing operational costs.

Non-domestic waste - All non-household premises (includes businesses with over 10 Full Time Equivalent (FTE) staff) will be required to present dry recyclables, residual and food waste (does not have to be weekly) separately by March

2025. Proposals to include charity shops, places of worship and hostels currently being consulted upon.

This is a key consideration for authorities providing commercial waste collections and collections to other non-household premises such as schools. The variation in dates could present operational challenges, particularly with regards to the earlier start for the collection of food waste.

- 9.4 To support the work around consistency in recycling collections, a Worcestershire Task & Finish Group has been operating as a sub-group of the existing Worcestershire Partnership's Strategic Waste Management Board. The Task & Finish Group consists of both Members and Officers and will continue to provide reports for the Worcestershire Leaders Board so that Senior Politicians remain well briefed.
- 9.5 The Task & Finish Group have commenced a piece of work to explore a range of alternative collection models including comingled recycling and multi-stream recycling, and 2 weekly and 3 weekly residual waste collections, with each option including the new mandated weekly food waste collection. Each option will need to be assessed against a range of criteria including cost, environmental impact, customer impact, impact on recycling rate, and impact on recycle quality.
- 9.6 The Worcestershire Waste Task & Finish group is currently preparing a report to the Worcestershire Leaders Board and this will be updated to reflect the latest announcements. As stated above, Government have set out a requirement to introduce domestic food waste collections by 31 March 2026, and the Task & Finish Group report will consider this against the groups original proposed date of 2027.
- 9.7 Although the Task & Finish Group will continue to brief Worcestershire Leaders Board, any decision to make significant changes to the way in which waste & recycling is collected within the City, would be a decision for Environment Committee and so relevant reports will be presented to this Committee when required.
- 9.8 As with many other sections of the Act, secondary legislation is required to implement those elements of Part 3 that have been presented in this report and further reports will be provided to this Committee both for information and where formal decisions are required.

10. Year One Proposed Actions

Biodiversity

- 10.1 Publish the first report and action plan under the strengthened biodiversity duty, as outlined in Appendix 1, considering the Council's policies, objectives and planned actions to enhance biodiversity across the city.
- 10.2 Undertake the proposed actions in section 4.12 of this report, as relevant to this authority, alongside the Planning Advisory Service's 'BNG readiness checklist', to ensure the Council is prepared for the January 2024 BNG deadline.
- 10.3 Seek to work with other local authorities to ensure understanding of the role and actions of statutory consultees and major developers.
- 10.4 Plan reviews of BNG proposals from developers under the mandatory 10% net gain requirement three and six months after implementation of the new rules.

- 10.5 Understand the biodiversity baseline of the city, in particular on the Council's own estate and provide officers and members with an introduction to biodiversity in Worcester, including notable and protected species, key existing habitats and key opportunities for habitat improvement.
- 10.6 Engage with key local stakeholders to understand their role and input and the opportunity to use citizen scientists to enhance the Council's knowledge of local biodiversity and opportunities for improvement.
- 10.7 Set out a strategy for offering the opportunity to developers to purchase biodiversity units from the Council, following discussion with other local partners and landowners to ensure a coordinated approach.
- 10.8 Establish a biodiversity management group of officers across Planning, City Services, Corporate Policy and Strategy, and Community Engagement to coordinate delivery of the Council's biodiversity duty.

Waste & Recycling

- 10.9 Officers and Members to continue to engage fully in the work of the Worcestershire Waste Task & Finish Group and to ensure Lead Members and Group Leaders are kept briefed.
- 10.10 Officers to monitor for publication of consultation documents, guidance or secondary legislation relating to those schemes outlined at para 9.3 and to consider any impacts they may have on the council.
- 10.11 Further reports to be presented to Environment Committee for decision, where changes to the way in which waste & recycling services are delivered are proposed.

11. Implications

11.1 Financial and Budgetary Implications

There are no immediate financial implications arising from this report. Meeting the Council's biodiversity duties may create financial pressures, but these have not been identified in detail at this stage. The Council was awarded £53,614 to support the implementation of Biodiversity Net Gain over the two years 2022/23 and 2023/24, of which £37,378 has been provided to 31 August 2023. The remaining tranche is for the final six months of 2023/24. Further reports will be brought to Committee setting out potential funding requirements in due course.

The report outlines that DEFRA have secured £295 million of capital funding (vehicles and containers) to support the introduction of mandatory food waste collections. It is understood that this will be allocated to LAs this financial year (as part of settlement) with payments based on modelled costs. Government will provide local authorities with funding to meet agreed reasonable new burdens arising from this policy, including up-front transition costs and ongoing operational costs.

11.2 Legal and Governance Implications

The report sets out the new duties on the Council relating to biodiversity and waste arising from the Environment Act 2021. New secondary legislation on aspects of the Environment Act 2021 is expected and will be closely monitored, with subsequent reports to this Committee as required.

11.3 Risk Implications

There is a reputational and compliance risk to the Council if it does not respond to new duties arising from the Environment Act 2021 in addition to the risk to the City's biodiversity.

11.4 Corporate/Policy Implications

Whilst the duties described within this report are new and arise from the Environment Act 2021, they support the City Plan theme of Enhancing and Sustaining our City for Future Generations and the Council's declaration of a biodiversity emergency in 2020.

11.5 Equality Implications

There are no identified equality implications arising from this report.

11.6 Human Resources Implications

The new duties on the Council outlined in this report, particularly in relation to biodiversity, will require reallocation of existing staff resources or additional internal or external capacity. Options for delivering the proposals within this report are currently being evaluated.

11.7 Health and Safety Implications

There are no identified health and safety implications.

11.8 Social, Environmental and Economic Implications

The Council's agreed Environmental Sustainability Strategy and Action Plan outlines a number of actions around waste and recycling, and biodiversity. Responding to the new duties and requirements on local authorities will enhance the biodiversity and the natural environment and has the potential to provide social and economic benefit to the City.

Ward(s):

All

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Background Papers:

[Biodiversity Action Programme.pdf \(worcester.gov.uk\)](#)
[Enhancing biodiversity - Worcester City Council](#)
[Biodiversity and Planning - Worcester City Council](#)

'First Considerations' Biodiversity Duty Action Plan – DRAFT OCT 2023

1	Biodiversity Strategy	Write and consult on a biodiversity strategy for the Council, including consideration of climate resilience and adaptation synergies and opportunities	Not yet started	Sustainability Team	April 2024	March 2025
2	Embedding of biodiversity considerations	Ensure biodiversity is an overarching policy and decision making influence across all Council services	Some progress to date	Sustainability Team	January 2024	March 2025
3	Biodiversity units scheme	Consideration of a biodiversity units scheme for developers requiring off-site biodiversity net gain improvements, including identification of which of new or existing projects could qualify to provide units for the scheme	Not yet started	Sustainability Team / Development Control	Nov. 2024	October 2024
4	Conservation covenant scheme	Consider becoming a responsible body under the conservation covenant scheme	Not yet started	Sustainability Team	April 2024	March 2025
5	Baselining and mapping	Procure baseline biodiversity data and map this, ensuring that information about the presence and status of notable species, and presence and condition of habitats, is readily accessible to officers and members	Not yet started	Sustainability Team / GIS Officer	January 2024	March 2025

6	City Services Management Plan and Operational Plans	Complete and embed into operational practice the biodiversity focused management plan; and to embed biodiversity into all City Services training and operational plans, ensuring enhancing biodiversity is at the heart of this service	Management plan drafted for consultation	City Services	Already started	March 2025
7	Biodiversity training	Agree a programme of member and officer training (both generalist and specialist as required), disseminating knowledge about local biodiversity (species locations and habitat conditions)	Not yet started	Sustainability Team	April 2024	April 2025
8	Partnership working	Embed partnership working into business as usual practice, through establishing regular communication channels and reporting lines	Not yet started	Sustainability Team	April 2024	October 2024
9	Biodiversity projects on waterways	Following the assessment of opportunities to improve biodiversity on waterways, to develop an action plan of projects	Consultants' report received	Sustainability Team / City Services	Nov. 2023	October 2024
10	New project scoping	Using enhanced partnership working and baseline data, identification of new biodiversity enhancement opportunities	Ongoing	Sustainability Team / City Services	Ongoing	Ongoing
11	Scope funding opportunities	Identify opportunities for funding for biodiversity net gain projects	Ongoing	Sustainability Team / City Services	Ongoing	Ongoing
12	Staff resources	Review staff resources to ensure we have the capability and capacity to act	Already started	CLT	October 2023	April 2024
13	LPA	Fully review the guidance for Local Planning Authorities and agree a programme of activity aligned with the corporate action plan	Already started	Development Control Service	Ongoing	December 2023