

Table of Comments

Format of this document

This document sets out summaries of the responses to the draft version of Derby City Council's Environmental Policy.

The document is set out in the following way:

Categories

1. General expressions of support
2. Specific comments relating to the draft Policy
3. Observations and queries that were not focused on making specific changes to the draft Policy
4. Comments concerning design and graphics in the draft Policy

General grammatical comments have not been included in this report.

Respondents

A wide range of individuals, groups and organisations responded to our consultation. They are not individually listed in the table, which follows, in order to protect confidentiality. Broadly speaking they fall into the following 5 categories:

1. Local external groups and organisations
2. Internal groups and committees
3. External advisory committees to the Council
4. Council officers
5. Councillors'

The table is set out in the following way:

- Category heading
- Summary of the representation
- Council's response
- Proposed response

Bold text indicates where we agree partly or completely with the respondent's remarks and have responded with changes to the draft document:

| 1) General expressions of support | | |
|--|--|-----------------|
| Summary of representation | Response | Proposal |
| Very good | General statement. No response needed. | |
| I support all the aims. | General comment no response needed | |
| A positive, informative document, which shows how much the council relies on others to meet its environmental goals. | General comment no response needed | |
| A very good policy. Good to encourage public transport but would like to see more car parks in Normanton. | General comment no response needed | |
| Very good start. Commitment to 'put its own house in order' very welcome as experience shows that different departments respond very differently. | General comment no response needed | |
| A very good document that captures the main strategies areas the council can be influential in and provides the framework for more detailed programmes and action plans. Delivery is the challenge | General comment no response needed | |
| I agree with all the aims and hope that a strong message goes out to the people of Derby. | General comment no response needed | |
| Well put together. Not too wordy. | General comment no response needed | |
| It is an improvement on the 1998 version. Written in plain English with good order. | General comment no response needed | |
| Full support. It covers key areas and the embracement of sustainable development is a good one. Important to ensure all stakeholders own it. | General comment no response needed | |
| An important step towards developing more detailed environmental objectives | General comment no response needed | |
| A good, informative, well laid out document | General Comment no response needed | |
| A very comprehensive policy but the aims need to be enforceable | General comment no | |

| 1) General expressions of support | | |
|--|--|----------|
| Summary of representation | Response | Proposal |
| and financed. | response needed | |
| Very readable, precise, good tone, quite a good set of commitments | General comment no response needed | |
| Very good policy but aims need to be supported by legislation change to be robust. | General comment no response needed | |
| Document well thought out, structures, easy to read and simple to understand. | General comment no response needed | |
| Nicely laid out document with well-stated aims. In addition we need the legal requirements, how aims will be achieved and requirements met and who'll pay. | General comment no response needed | |
| Sustainable Development is a good term | General comment no response needed | |
| Good last paragraph on page 2 | General comment no response needed | |
| Excellent – now we need the power to make sure everyone is thinking like this. | General statement. No response needed. | |

| 2) Specific comments relating to the draft policy | | |
|---|--|--|
| General | | |
| Summary of representation | Response | Proposal |
| Concern over the 'we will' approach that appears throughout the document. | Concern noted but use of the term demonstrates real commitment | No change |
| Maintenance of our historic buildings needs to be emphasised as so many have been lost | We feel this view is now reflected in our Built Environment Aim | Sentiment included in new Built Environment aim |

| 2) Specific comments relating to the draft policy | | |
|---|--|---------------------------------|
| General | | |
| Summary of representation | Response | Proposal |
| Environmental tips for customers might be a useful addition | Not appropriate in a policy document. | No change |
| Need to make clear that this is a revised policy. | Agreed | Included in introduction |
| How strong is the policy? For example: objective number 2 page 2 is welcome but the following comment was made: "Note that the constant construction of buildings in conservation areas hardly inspires confidence." Under Aims page 4 section 3 – the aim of reducing motor vehicles sounds hollow when juxtaposed against Connecting Derby Phases ii and iii. | The council will be committed to the aims stated in this policy but it is unavoidable that difficult decisions will need to be taken in individual cases | No change |
| The public is sceptical of 'waffle' about enhancing the natural environment when planning/development services do not seem to have any time to enforce 'green' restrictions on any developments. | The policy is one part of a program of action to help decision makers realise the importance of natural history | No change |
| Excellent aims. However its robustness is dubious until it has full Chief Executive support and drive behind each one. | The council will be committed to the aims stated in this policy but it is unavoidable that difficult decisions will need to be taken in individual cases | No change |

| 2) Specific comments relating to the draft policy | | |
|---|--|---|
| General | | |
| Summary of representation | Response | Proposal |
| Scrutiny will be on strong linkage to departments' performance indicators. This needs to be reflected in where policy sits and in strategic managers use of it. | This is an important point and the internet version of the Policy will provide links. There will also be a page of related high-level strategies towards the rear of the revised document. | Internet version planned to include this. Policy changed to include list. Page 1 wording addition to include signpost |
| Local plan and sport and leisure strategy tie in – needs to be on first page. | This is an important point and the internet version of the Policy will provide links. There will also be a page of related high-level strategies towards the rear of the revised document. | Internet version planned to include this. Policy changed to include list. Page 1 wording addition to include 'signpost' |
| Hyperlinks/reference to relevant strategies | This is an important point and the internet version of the Policy will provide links. There will also be a page of related high-level strategies towards the rear of the revised document. | Internet version planned to include this. Policy changed to include list. Page 1 wording addition to include signpost |

| 2) Specific comments relating to the draft policy | | |
|---|--|---|
| General | | |
| Summary of representation | Response | Proposal |
| Addendum - list of strategies/locations/contacts | This is an important point and the internet version of the Policy will provide links. There will also be a page of related high-level strategies towards the rear of the revised document. | Internet version planned to include this. Policy changed to include list. Page 1 wording addition to include signpost |
| No mention of strategic/non strategic documents that these changes will be made through | This is an important point and the internet version of the Policy will provide links. There will also be a page of related high-level strategies towards the rear of the revised document. | Internet version planned to include this. Policy changed to include list. Page 1 wording addition to include signpost |
| Social Care for the elderly, disabled and vulnerable – a section on practical help should be included | While these are very important issues they are not relevant to the strategic nature of this document | No change |
| There is a need to mention ISO14001 – showing real corporate commitment | Agreed | A new bullet point added to the Putting the Policy into Practice section. |
| This document needs to go to full council for their ratification. | It will go through council for ratification | No change |

| 2) Specific comments relating to the draft policy | | |
|---|--|---|
| General | | |
| Summary of representation | Response | Proposal |
| Contact details should be in a prominent place: Environmental Co-ordination Team as well as main contacts for each aim. | This is an important point. The internet version of the Policy will provide contact details | No change to Policy. Suggestion incorporated into internet version |
| Reference to our collection and provision of information about Derby's geography, history, development, population and wildlife through activities at the Local Studies Library and the Derbyshire Biological Records Centre at the museum. | This is an important point. The internet version of the Policy will provide contact details | No change to Policy. Suggestion incorporated into internet version |
| A forward by the council leader is needed to endorse the policy. | Agreed | Added to page 1 |
| Community Strategy reference needed. | Agreed | Added to page 1 |
| We ask for the following additional aim to be considered 'The council recognises the importance of informal green space to the health and welfare of the people of the city. It will seek to achieve the minimum target for providing informal green space based on the standards set by English Nature for both the area and accessibility of such space' | Agreed | The main sentiments behind this comment have been taken into account in the 'Natural Environment' aim. |
| Need a glossary to explain biodiversity and geodiversity | Agreed. | Included on final page |

| 2) Specific comments relating to the draft policy | | |
|--|---|--|
| General | | |
| Summary of representation | Response | Proposal |
| Need a glossary to explain things like Biodiversity Action Plan, BAP | Comment elsewhere about the term biodiversity being possibly confusing to some people has been taken on board and the word 'wildlife' used instead | The term biodiversity and reference to BAP will not be included in the main body of text. The word 'wildlife' will be used instead of 'biodiversity' For conformities sake, relevant Council strategies and policies will only be mentioned under Key Strategies towards the back of the document |
| Need a glossary to show our interpretation of sustainable development | Page 2 is our interpretation of sustainable development. This needs to be made clearer | Wording included to explain this |
| Definition of sustainable development needed 'A real increase in well-being and standard of life for all people that can be maintained over the long term without degrading the environment and therefore compromising the ability of future generations to meet their own needs' | Page 2 is our interpretation of sustainable development. This needs to be made clearer | Wording included to explain this |
| How will the annual review work? Will it be a general statement or rely on indicators | Consultation with key people is ongoing. The format of the report is yet to be decided. | No change |

| 2) Specific comments relating to the draft policy | | |
|--|--|-----------------|
| General | | |
| Summary of representation | Response | Proposal |
| How will the annual review work? Will it be a general statement or rely on indicators. Need to signpost the action plan. | Consultation with key people is ongoing. The format of the report is yet to be decided. | No change |
| How will this work? How will motor journeys be reduced? How will Derby's heritage be conserved? | The aims of the policy will be put into practice through a wide range of council programmes and projects including the Local Transport Plan and the Local Development Framework. | No change |
| No time to consider. However the Chairperson feels there would be no disagreement with any of the aims. The issue is with implementation – opportunity to consult with the organisation on action plans? | <p>This particular organisation was given an extended deadline to comment on the Policy – no further comments were received.</p> <p>The Policy is a framework to guide the development of all council strategies and projects. It will not specifically lead the production of 'Action Plans'.</p> | No change |

| 2) Specific comments relating to the draft policy | | |
|--|---|---|
| General | | |
| Summary of representation | Response | Proposal |
| Will an action plan be created? | The Policy is a framework to guide the development of all council strategies and projects. It will not specifically lead to the production of 'Action Plans'. | No change |
| Replace 'the environment' with 'our environment' on pages 1,2,3,5,6 | The use of 'the' is standard in policy documents and could give more weight to the Environmental Policy. That said we appreciate the point that 'our' can help to create a sense of ownership and have decided to amend it where it does not affect the meaning, strength of aim or the grammar. Pending further changes this will be: page 1, point 2; page 2, final paragraph; and on page 6, bullet point 3. | No change |
| Page 2, bullet point 1 it is felt that you should change prosperity to quality of life. Wealth does not equal happiness. | Wording change | New wording "that accompany a good quality of life" to encompass this. |

| 2) Specific comments relating to the draft policy | | |
|---|--|---|
| General | | |
| Summary of representation | Response | Proposal |
| Change wording – social progress does not necessarily equal prosperity | Wording change | New wording “that accompany a good quality of life” to encompass this. |
| Page 1, lines 1-3, it is felt that a reword is needed to reflect the symbiotic relationship between us and our environment | Agreed | Wording added to first sentence on page 1: “and that the health and well being of the environment and ourselves is closely linked” |
| Page 1, line 5: Who are our customers? If they are members of the public will they understand what Derby City Partnership is? Also why will we work specifically with them? It could be seen as exclusion. | Agree that the draft wording could be interpreted as being exclusive. | Wording changed to be more inclusive |
| The four objectives are okay but health needs to be included | To be looked at in relation to line 1-3 | Wording added to first sentence on page 1: “and that the health and well being of the environment and ourselves is closely linked” |
| On page 1 The four objectives are good but health needs to be included in bullet point 2 or 3. | We agree that Health is important and have included it on page one in the amended version of the Environmental Policy | Wording added to first sentence on page 1: ‘and that the health and well being of the environment and ourselves is closely linked’ |
| Two identical responses - On page 1 Addition to bullet point 1 – ‘of which our environment activity forms an integral element’ | Page 1 is based on the nationally accepted definition of sustainable development | No change |
| On page 1, bullet point 2 remove ‘and intentions’, this is too vague | Agreed | Words removed |

| 2) Specific comments relating to the draft policy | | |
|---|---|--|
| General | | |
| Summary of representation | Response | Proposal |
| Two identical responses - 'Sustainable Development' section should be before 'This Policy' section. | Disagree. The current order is logical | No change |
| The heading on page 2 should be sustainability - development is not intrinsically sustainable. | Disagree. This is a widely accepted term to include social progress. This does not have to mean physical development. This is supported by comment from one of the council's advisory groups | No change |
| There is no mention of health and safety in the workplace in the Policy | While important this is not suited to inclusion in an Environmental Policy | No change |
| Page 2, bullet point 1: alternative wording suggested to emphasise importance of environment - 'social progress that goes hand in hand with a <i>healthy and diverse environment</i>. Everyone, throughout the world, should share in the benefits of economic progress that is based on respect and care for our environment' | The importance of linking the environment to social progress needs strengthening | Bullet point one amended to: 'social progress that recognises the needs of everyone and supports a healthy, safe, clean and diverse environment.' |
| The whole document is about protection of the environment – it is not just a point | Page 2 is our definition of Sustainable Development. This needs to be made clearer | Links between social, economic and environmental objectives made stronger to give a clearer definition of sustainability |
| Pollution and habitat loss are two distinct issues of equal importance | Agreed, but this is adequately covered in the policy | No change |

| 2) Specific comments relating to the draft policy | | |
|---|---|--|
| General | | |
| Summary of representation | Response | Proposal |
| <p>Suggested alternatives to bullet point 2 <i>There should be two separate paragraphs, physical environment and pollution</i> Physical Environment: We should protect and even create diverse wildlife habitats and green places, for the mental well being of local people and as a contribution to maintaining the ecological balance of the planet. We also need to protect and enhance other things that people need or value, such as landscapes, pleasing townscapes and historic buildings.</p> <p>Pollution: We must limit and eventually eliminate all forms of water and air pollution. This causes ill health to people and damage to wildlife at a local level; ecological disruption and devastating climate change globally. Local should be global</p> | <p>Agree with some of the wording but feel that all environmental points should be kept under the heading of “Protection of the environment” as a component of “Sustainable Development”</p> | <p>‘and enhance’ and ‘Pleasing Townscapes’ added to bullet point 2.</p> |
| <p>Wildlife should not be portrayed as a ‘thing’</p> | <p>Agreed</p> | <p>“or have importance in their own right” added to bullet point 2</p> |
| <p>Page 2, bullet point 2: Word addition/change – ‘We must act to limit <i>our contribution to global environmental threats ...</i>’</p> | <p>This statement is inherent within the overall definition of Sustainable Development as it stands</p> | <p>No change</p> |
| <p>Page 2, bullet point 3: Word addition/change - encourage ‘and facilitate’ the development of alternatives to replace them as a ‘matter of urgency’</p> | <p>Agreed</p> | <p>Changes made</p> |

| 2) Specific comments relating to the draft policy | | |
|---|---|---|
| General | | |
| Summary of representation | Response | Proposal |
| Page 2, do we need bullet point 4? It is covered in the opening paragraph and in bullet point 1. | Bullet point 4 is needed to keep in line with the accepted definition of Sustainable Development, which provides a general context for the policy. | No change |
| Page 2, bullet point 4: you mention 'meeting the needs of people in less developed countries' – how? | Through the cities commitment to Fair Trade as a Fair Trade City | No change |
| Page 2, bullet point 4: include priority on local sources to reduce delivery miles but also remembering needs of people in less developed countries | Understand the point made, but it is stressed that our definition of sustainable development is based on meeting four objectives at the same time, including the protection of the environment. | No change. |
| Page 3, Line 1-5: Remove 'and' Add 'and where possible improve it' Add after legislation – 'and help others to play their part in the work of protecting and improving our common environment' | Agree with sentiments. | Wording changed to: 'Our overall goal is to protect and enhance the environment while sustaining it for future generations. We will do this by working in partnership with others to continually improve our environmental performance.' |

| 2) Specific comments relating to the draft policy | | |
|--|---|---|
| General | | |
| Summary of representation | Response | Proposal |
| Page 3, Line 1-5: 'Protect the environment' does this mean leave it as it is or clean it up? | Agreed that this is not clear in the draft policy. | Wording changed to 'protect and enhance' |
| Page 3, Line 1-5: Concern over the phrase 'to go beyond the requirements of all relevant environmental legislation' | While ISO14001 requires continual improvement and organisations to go beyond the requirements of legislation it is agreed that this phrase is redundant in this sentence and should be removed | Phrase removed |
| Page 3, Line 1-5: The phrase 'to go beyond the requirements of all relevant environmental legislation' is nonsensical in this sentence. | While ISO14001 requires continual improvement and organisations to go beyond the requirements of legislation it is agreed that this phrase is redundant in this sentence and should be removed | Phrase removed |
| Proposed order of aims : 1Natural and Built Environment; 2 Natural resources; 3 Waste; 4 Energy; 5 Purchasing and contracts; 6 Transport; 7Pollution; 8Climate Change; 9Environmental Education | Indication that excepting climate change the order of aims is not prioritised | No change |

| 2) Specific comments relating to the draft policy | | |
|---|--|-----------|
| General | | |
| Summary of representation | Response | Proposal |
| Wildlife and Geology nearer the top of the list. | With the exception of Climate Change, the order of the aims is not prioritised | No change |
| Are the aims in order of priority? | With the exception of Climate Change, the order of the aims is not prioritised | No change |

| 2) Specific comments relating to the draft policy | | |
|--|---|--|
| Aim 1: Climate Change | | |
| Summary of representation | Response | Proposal |
| Strengthen “we will encourage planning policies which support emission reduction and investigate ways to minimise the release of greenhouse gases” | Agree in principle | Rewrite of aim to make a more comprehensive statement |
| Word Addition, lines 1 and 2: <i>‘firstly’</i> promote ways of mitigating and <i>‘then’</i> adapting to its effects | Understand the reasoning behind this remark but feel there is a need for mitigation and adaptation to take place simultaneously | No change |
| Need to do more than just ‘promote’ and ‘make allowances’ | Agree in principle | Wording changed to incorporate some of the changes suggested |
| ‘very wishy washy’ particularly ‘make allowances’ | Agree in principle | The words ‘make allowances’ have been taken out. |
| Not global warming but climate change.... We still don’t know if it will warm or cool or just change | Global warming will produce/is producing climate change and what this change is will depend on locality. | No change |
| Suggest re-writing as: <i>‘The Council will continue to raise awareness of the existence and causes of global warming, while at the same time pursue policies which contribute to its mitigation. We will consider the implications of climate change on future plans, policies and strategies and make the necessary allowances.’</i> | Agree in principle | Rewrite of aim to make a more comprehensive statement included the following suggested words ‘of the existence and causes of global warming’ |

| 2) Specific comments relating to the draft policy | | |
|---|---|-----------------|
| Aim 1: Climate Change | | |
| Summary of representation | Response | Proposal |
| Word change 'we will consider the optimum way of taking on board these implications of climate change on our future plans, policies, strategies and activities.' | It is felt that the revised version of the aim is more comprehensive than the draft and that the suggested wording would not be preferable. | No change |
| Word change : 'we will consider the optimum way of taking on board these implications of climate change in our future plans, policies, strategies and activities' | It is felt that the revised version of the aim is more comprehensive than the draft and that the suggested wording would not be preferable. | No change |
| Link energy and climate change | Disagree. Climate change could link with any of the aims and to do so would complicate the document | No change |

| 2) Specific comments relating to the draft policy | | |
|--|--|---|
| Aim 2: Natural Resources | | |
| Summary of representation | Response | Proposal |
| While timber is a natural resource are we really trying to conserve it? | The council is trying to promote sustainable use of timber and conserve the woodlands | Wording changed to emphasise this. 'The council will promote the importance of conserving fossil fuels and peat and the sustainable use of resources such as water, and timber.' |
| What about gas | Gas is considered to be a fossil fuel product and is therefore implicit in the reference to fossil fuels. | No change |
| We are not saving energy we are reducing water and energy waste | Agreed | Wording changed to emphasise this. 'It will also adopt water and energy waste reduction measures and take into account natural resource considerations when procuring goods and services.' |
| The mention of energy-saving measures in relation to water, timber and peat is probably not all that appropriate here, as most energy comes from burning oil and coal. Can it be re-written to take account of these? | Agreed that the aim needs tightening. | Wording changed to take this into account. |
| Need to make clear distinction between peat and wood where the over-exploitation is the environmental issue and those that can lead to local pollution such as solvents. | It is felt that prevention of over exploitation is implicit in the current wording and that pollution is covered in aim 5. | No change |

| 2) Specific comments relating to the draft policy | | |
|---|---|---|
| Aim 2: Natural Resources | | |
| Summary of representation | Response | Proposal |
| “We will use only peat free products and timber grown from sustainable forests” | The council will continue to trial peat free growing medium alternatives until one giving equivalent growth is found. The EU Procurement Directive leaves scope for quality considerations in procurement and allows that environmental factors can be viewed as ‘quality’ ones, so use of sustainable wood could be stipulated. This level of detail in the environment policy is unhelpful it would be better to form the questions and tender requirements stipulated under our new procurement guide. | No change to Policy (But tender requirement will be stipulated under the new procurement guide) |
| Add fossil fuels | Agreed | Words added |
| Add fossil fuels | Agreed | Words added |

| 2) Specific comments relating to the draft policy | | |
|--|--|---|
| Aim 3: Transport | | |
| Summary of representation | Response | Proposal |
| Include in Transport aim ‘The council will enable the public to make the best environmental choice by making it as attractive as possible’ | Agreed in principle. The wording ‘making the best environmental choices as attractive as possible’ should relate to all environmental issues | Wording included in Environmental Education aim |

| 2) Specific comments relating to the draft policy | | |
|--|--|---|
| Aim 3: Transport | | |
| Summary of representation | Response | Proposal |
| What does the phrase improve access mean – we will provide a minibus? Or is it traffic control? Are buses really unsafe then? Suggested alternative “It will strive to..... by improving public transport and reducing congestion” | In this context, accessibility is about helping people to gain access to key services. | No change |
| How will the council encourage sustainable modes of travel. How does Riverlights, with further parking, support this? | By improving physical facilities such as bus shelters and bus lanes. By working with bus operators to encourage new services and tickets. The Riverlights development will provide a new bus station to provide a better public transport service | No change |
| The second line of the transport aim is essentially the same as the first. | Disagree | No change |
| Bus and rail are ‘more’ sustainable. Walking and cycling ‘are’ sustainable. | Agreed | Addition of the word ‘more’ in the transportation aim. |
| “We will encourage a move from private car to public transport and seek to integrate public transport” | This already forms part of the original aim | No change |
| The council will ‘encourage ‘more’ sustainable modes of transport, such as walking, cycling.... ‘And will manage traffic more effectively to reduce the environmental impact.’ It will... | Agree that the term ‘more’ should be incorporated. A model shift is the main objective – getting people out of their cars and using more sustainable forms of transport. | The word ‘more’ added No change to the second part of the response. |

2) Specific comments relating to the draft policy

Aim 3: Transport

| Summary of representation | Response | Proposal |
|---|---|------------------------------|
| Transport aim too confined to city. Should discourage out of town travel to work. | The Joint Local Transport Plan with the County Council does recognise that certain transport issues are not just confined to the city. The council can only really encourage people to use public transport when travelling to work | No change |
| Walking and cycling are the only sustainable forms of transport. | Agreed | The word 'more' added |
| Line three – finish aim at need. | No. The rest of the sentence outlines how we can achieve the aim. | No change |
| What about council's own transport – electric vehicles. LPG | The council is encouraging the use of alternatively powered vehicles and currently has a fleet of 45 LPG and electrical vehicles | No change |
| Cycle Paths? | The council has a comprehensive programme of cycle paths. This level of detail comes within the Local Transport Plan | No change |
| Concern expressed over robustness of the Transport aim particularly in light of Riverlights development | The Riverlights development will provide a new 'state of the art' bus station that will provide a better public transport facility | |