

Environmental Outcomes Report: a new approach to environmental assessment

Kent County Council Response

9 June 2023

Guiding principles for the development of outcomes

Question 1: Do you support the principles that will guide the development of outcomes?

[Yes/No].

The County Council is generally supportive of the principles that guide the development of outcomes, as these are based on the Environment Improvement Plan (EIP) Goals.

However, there are concerns that the historic environment and population health are not fully considered.

The County Council requests that Environmental Outcomes Reports fully consider the impact of development on population health to ensure healthy and thriving existing and new communities.

In respect of the historic environment, it is the view of the County Council that the current EIP does not appropriately cover the historic environment. The only relevant goal is concerned with heritage within protected landscapes. This is too narrow a focus and risks losing the benefit of the current environmental assessment process for the historic environment. The environment within the UK and particularly England is mostly human created and managed and it is important that the historic dimension of the environment is thoroughly considered in the assessment process. As noted in paragraph 3.4, there are benefits in including assessment of cultural heritage and the historic environment in the environmental assessment process so that significant issues can be considered at an early stage in the design. The new Environmental Outcome Report (EOR) process must specifically include cultural heritage and the historic environment. With reference to paragraph 4.8, it is also important that the historic environment sector is included in the development and testing of the proposed outcomes. The County Council considers that the benefits of considering cultural heritage and the wider historic environment together with other matters in a multidisciplinary way at an early stage in the design process allows significant issues and potential conflicts to be resolved at an early stage and costly delays minimised. Including the historic environment in the EOR process will also help ensure that the mitigation hierarchy is appropriately followed.

The County Council is generally supportive of a simplified and streamlined assessment process that underpins the delivery of clear environmental considerations and provides a 'green thread' that runs through decision making. It is agreed that a link with the Government's Environmental Improvement Plan is a reasonable starting point for a new assessment process. There are, however, obvious challenges to meet the needs of the

identified stakeholders such as communities, decision makers, environmental interests, policy makers and the development industry. Any new process therefore needs to recognise that they have different and often competing needs. Unless the details are right, proportionate, readily understood and properly resourced, there is a serious risk that one complex assessment process will be replaced by another. The success of the new assessment process will be determined by the detail, which the consultation recognises is not currently available. In the absence of the detail, it is difficult to fully comment upon the acceptability of the proposals, although the principles set out in paragraph 4.7 would appear to be reasonable ones. The County Council notes the commitment to further consultation which is welcomed. In developing some of the detail, further consideration should be given to the following:

- Clarity as to which projects and proposals would need to report on the outcomes being developed. It is not clear whether it relates to those that are in the category 1 and some of 2, depending on the outcome of the screening.
- Review of outcomes on a regular basis (see paragraph 4.7). The County Council would require clarification on how regular this will be. Consideration will need to be mindful of systems and impacts of change.
- Will there be further consultation on regime specific outcomes referred to in paragraph 4.10? This would be welcomed.
- Clarification is sought as to whether a project or proposal would have to provide data to show its likely effect/impact on each outcome indicator baseline condition, and then monitor and report on the outcome and any changes at a project level in relation to each. In addition, clarification is sought as to whether they would be reporting via the planning application / decision information or reporting against the EIA information / decision where monitoring arrangements already exist for EIA development.

Demonstrating how outcomes are met

Question 2: Do you support the principles that indicators will have to meet? [Yes/No].

The County Council is supportive on the assumption that the evidence base requires the need for site specific surveying at a project level.

The ability to change indicators in response to evidence gathered from environmental assessment and the active monitoring of outcomes being delivered means that the system, would be heavily reliant on monitoring and reporting and understanding / availability of data. Monitoring resources is likely to be a key challenge to effective delivery.

The County Council also agrees that for the historic environment, it may not always be possible to create a quantitative metric and professional judgement may need to be applied.

Question 3: Are there any other criteria we should consider?

The County Council notes that Carbon is not featured within the list of matters to be considered within paragraph 4.10 and instead, individual regimes are expected to produce regime specific outcomes. Carbon emissions are a key driver of climate change and are increasingly becoming a key consideration in transport and highway schemes, and it is the County Council's view that these should be included.

The County Council would note that once the outcomes are clarified, there must be an opportunity to provide further commentary in respect of the criteria to ensure they cover all the issues.

The County Council considers that it is not clear from the information provided within the consultation, where there will be a need for site specific surveys in respect of biodiversity and ecological matters. There is a need to ensure that data used to assess plans or projects is specific to the site being assessed and not using existing data sets.

The County Council recommends that alongside desk-based evidence, local knowledge and the role of an independent expert must be considered.

The County Council also notes that indicators for the historic environment will be needed and would be happy to work with Government to consider what would be appropriate. The specific cultural heritage indicator in the current EIP is for the condition of scheduled monuments. The County Council would suggest that a wider set of indicators is included in the EOR regulations and guidance, and engagement would be welcome to discuss what would be practical and measurable.

The County Council would also recommend that cultural heritage should continue to be included in EORs as many of the proposed topics within EORs are also covered in other regimes. The EIA / EOR process allows evidence from different aspects of the environment to be considered in a multidisciplinary way so that areas of conflict can be resolved and significant historic environment issues addressed at an early stage in the design process. This also reduces costs and delays for the developer.

Reporting against outcomes

Question 4: Would you welcome proportionate reporting against all outcomes as the default position? [Yes/No].

The County Council considers that support for this proposal will also be dependent upon the level of detail required (outcomes or indicator reporting) and whether there is a prerequisite requirement for developers to report to Local Planning Authorities. The purpose for the data reporting needs to be made clear and a set format and frequency for reporting would be helpful. A proportionate system needs to be established to help meet objectives without creating additional burdens, duplication and inefficiency.

In respect of highways schemes, which can vary significantly in size and scope, the County Council would be concerned that disproportionate reporting would result in cost overrun of smaller schemes and inflate scheme costs for competitive bids and business cases.

The County Council also considers that it is not clear what is meant by 'proportionate'. Under the BS 42020:2013 Biodiversity, Code of Practice for Planning and Development and CIEEM (2017) Guidelines for Ecological Report Writing, reporting should already be proportionate, so the County Council would ask that this differentiation between this proposal and the British Standards is clarified.

The County Council considers there is a need to ensure that the project / plan is being assessed using data relevant to the current site to ensure informed decisions around planning and growth across the country.

Question 5: Would it be effective in reducing bureaucratic process, or could this simply result in more documentation?

There is the potential for the proposal to result in more documentation. Streamlined, standard requirements and reporting for larger projects is likely to result in simplified, clearer documentation. More documentation would, however, be required for smaller projects than at present, adversely impacting scheme programmes and costs. The County Council does, however, consider there is limited clarity offered in this consultation to understand the implementation of the new approach. Therefore, it is difficult to definitively determine whether it will be effective and the County Council would therefore welcome further consultation once the details are decided and would suggest that environmental matters must be addressed on all projects, regardless of size.

Going further for the environment

Question 6: Given the issues set out above, and our desire to consider issues where they are most effectively addressed, how can government ensure that EORs support our efforts to adapt to the effects of climate change across all regimes?

The County Council considers that there must be consultation with expert independent groups, who have practical experience of dealing with EORs and climate change. This is to allow them to feed into considerations to ensure that EORs fully support efforts to adapt to the effects of climate change across all regimes.

The County Council also notes that addressing public behaviours around climate change, is also fundamental to addressing issues. For example, further encouragement for a modal shift in transport through effective opportunities to change travel behaviours. There needs to be continued consideration of how to address public thinking on all environmental issues. Skills and expertise must be expanded within Local Authorities and developers alike to help address this.

The County Council notes that there is currently a lack of reliable data regarding the impact of climate change on the historic environment – EORs may provide an opportunity to gather this data more centrally.

What an Environmental Outcomes Report will cover

Question 7: Do you consider there is value in clarifying requirements regarding the consideration of reasonable alternatives? [Yes/No].

The County Council considers that there is value in clarifying requirements regarding the consideration of reasonable alternatives, including a more concentrated focus on the mitigation hierarchy. Guidance on this would be welcomed to ensure expectations are clear. The County Council considers that there is also a need to ensure that the impacts on ecology are considered as part of the site assessment process.

Question 8: How can the government ensure that consideration of reasonable alternatives is built into the early design stages of the development and design process?

The County Council would recommend that the requirement to consider reasonable alternatives should be clearly detailed, and the impacts of not meeting the requirement addressed. The County Council recommends that there should be a requirement for the applicant to demonstrate through an application, that alternatives have had the necessary consideration and there is a clear justification for why the site was selected. This should be a more prominent part of the environmental report. Regulations should also consider whether officers are able to recommend refusal if an applicant has not given early and effective consideration of reasonable alternatives.

The County Council would also recommend engagement with other organisations such as the Royal Institute of British Architects (RIBA), Royal Institution of Chartered Surveyors (RICS), Royal Town Planning Institute (RTPI) and universities, to embed environmental considerations within the site selection and design phases. The mitigation hierarchy must be a more prominent and necessary consideration through the EOR process.

When an Environmental Outcomes Report is required

Question 9: Do you support the principle of strengthening the screening process to minimise ambiguity?

The County Council supports the principle of strengthening the screening process to minimise ambiguity. However, the category 2 consents screening process may still have scope for ambiguity, depending on the detail of how borderline cases should be considered and the criteria to be applied. Further information and consultation would be welcomed to clarify this.

Question 10: Do you consider that proximity or impact pathway to a sensitive area or a protected species could be a better starting point for determining whether a plan or project might require an environmental assessment under Category 2 than simple size thresholds? [Yes/No].

The County Council considers that this proposal could require greater technical biodiversity / ecology or other technical advice input at an earlier stage in the process i.e. when screening a project. Sufficient resources may not be available to Local Planning Authorities to provide this, particularly in light of new burdens regarding Biodiversity Net Gain and other responsibilities arising from the Environment Act.

In addition, it would depend on the level of detail. For example, would proximity alone be a criterion, or would it also need the defined pathway and if the scale of the development is a secondary consideration how could that work in combination? A very small development may be caught within the screening because of proximity and pathway – the approach must remain proportionate.

The County Council does consider that there are some benefits to a simple size threshold as the larger the site, the greater the likelihood of encountering previously unrecorded significant heritage assets. Often it is only through the assessment process for such schemes that such assets are identified and the earlier in the design process this occurs, the lower the requirement for expensive redesigns. In addition, it is considered that there should also be specific triggers for the historic environment for Category 2.

The response to this question is also considered as part of question 11.

Question 11: If yes, how could this work in practice? What sort of initial information would be required?

As Local Highway Authority, the County Council considers that in relation to highway schemes, the proposals, as outlined, would result in an increase in work at the early stages of the project to determine whether screening is required.

It should be noted that, for some sites, it is not always known if a particular protected species is present within the vicinity of the site before more detailed surveys have been undertaken. The proposals as suggested must ensure that relevant and necessary surveys are undertaken to determine proximity to protected species. Consideration would also need to be given to whether a screening for an EOR report would need to be revisited if boundaries of a protected area change, or unknown protected species are found within the vicinity of the site after an initial screening decision has been made.

The County Council also considers that this will be very difficult to implement in practice. Simplistic criteria such as distance or crude zones of influence are unlikely to be fully effective as each ecological feature is likely to have different tolerances at different distances, and impact pathways may be difficult to identify without taking a detailed look at each application.

The County Council anticipates that there would have to be a detailed screening stage to properly consider possible impacts associated with proximity and impact pathways. A measure of baseline survey data may also be required to identify possible receptors as in most cases there is a lack of sufficient existing / accessible data. The suggested approach in Question 10 seems to be targeted at the protection of existing designated sites or known locations of protected species. In most cases, it is the County Council's view that there is likely to be a lack of comprehensive data to facilitate this approach. Taking an approach based on set zones of influence is likely to oversimplify the process of an environmental assessment and could result in significant negative effects for biodiversity and is therefore not supported by the County Council.

The County Council would also draw attention to the need for a detailed assessment of sites through the Local Plan process, covering all necessary environmental measures.

The County Council would also note that simple size thresholds are useful as there is an increased likelihood of encountering unexpected significant heritage assets in large sites. A trigger for heritage assets / historic environment is also needed.

As the outcome work progresses, the County Council would welcome consideration of the following:

- What would the defined pathways be?
- What would the proximity be, and would it vary depending on what the sensitive receptor is?
- What data sources would be used for communities/species and is it currently available to those that would need to use it?
- Detail on how to screen against the new criteria and the level of detail required in order to make the decision.

Strengthening mitigation

Question 12: How can we address issues of ineffective mitigation?

Currently, mitigation approaches are put forward and accepted, but the monitoring of the success or failure of these approaches is currently lacking, as is a feedback loop to other similar cases. The County Council would like to see the EOR process tackling this issue. Creating a centralised searchable database and / or repository that records baseline data for a site, mitigation proposed, and then the outcomes and lessons learnt would be beneficial. The database would need to be carefully set up so data can be entered at the point of a planning application / condition discharge and then datasets analysed at a national / local / project level so trends can be identified. It would allow evidence to be gathered to enable changes to be made to current mitigation approaches and support Local Planning Authority challenges to mitigation suggested.

The County Council also considers that undertaking rigorous scientific study for a variety of different techniques through universities would also be of benefit. Taking forward what works and improving on what does not work should feed into future applications / methodology.

In addition to collecting good data and funding research into effective mitigation techniques, there is a need for Local Planning Authorities to be able to carry out enforcement action when mitigation is not being implemented properly.

The County Council would also recommend consideration of enforcement where mitigation is not implemented appropriately, reflecting the size of development and impact across all criteria.

The County Council would also recommend that mapping data is compiled of sites and areas which have been preserved in situ, with a form of protection for these areas introduced to ensure harm is avoided from future developments.

The County Council also considers that in addressing this issue, careful consideration will need to be given to the impact upon Local Planning Authority resources.

Question 13: Is an adaptive approach a good way of dealing with uncertainty? [Yes/No].

The County Council is supportive in part, however, there is a need for Local Planning Authorities to have the ability to secure and review necessary monitoring data and have the capability to take action where monitoring shows remedial action is necessary. Proposed mitigation measures must be clearly set out as part of planning applications, and monitoring should be practicable to ensure it can be enforced as necessary.

The County Council understands that adaptive management may help to manage uncertainty in the assessment of effects on the environment. There is, however, a need to provide clarity on the level of uncertainty which may be allowed as this may influence the level of monitoring required.

Question 14: Could it work in practice? What would be the challenges in implementation?

The County Council considers that should an adaptive approach be adopted, projects and schemes with defined budgets would be required to allocate funding to potential unknown levels of mitigation, inflating their costs. There is uncertainty as to how long additional funding would need to remain available and what happens to the funding if it is not utilised, or conversely, if insufficient funding is available.

The management and resourcing of monitoring will be key for the effective implementation of this approach to ensure outcomes can be effectively reviewed and action taken as may be required. Monitoring proposed and expected mitigation is often not carried out at present as it is considered a discretionary function, therefore expertise and resources must be delivered to ensure the effectiveness of the proposal.

Effective resourcing would appear to be a key challenge to address. If a chargeable monitoring regime similar to that for minerals sites is being suggested for EIA planning permissions then the connections back to the information in the original environmental assessment and the original mitigations would be needed. This would be along with a

mechanism to formally record, track and monitor adaptations to the mitigation. Operator reporting requirements would need to be routed via the Local Planning Authority or regulator to those interested in the data on the mitigations and outcomes. It is noted that the statutory chargeable monitoring costs for some types of county matter development do not cover the costs of the monitoring and that this fee was not identified for an increase as part of the recent Performance and Fee Consultation.

The County Council considers that a key challenge in implementing the adaptive approach would depend on the level of risk to the mitigation that is proposed. A new approach/change in methodology for mitigation may require higher levels of adaptation to enable success but ongoing monitoring will help mitigation evolve successfully.

It must also be clarified as to what happens if the mitigation has not been achieved. It must be understood by the Local Planning Authority and applicants that if mitigation measures do not work, then there is a need to remediate and the responsibility for this must be clear and the guidance must be flexible to allow for this.

The County Council would also urge the need for potential loopholes to be minimised, with a consistent approach applied nationally to ensure the approach is most effective.

The County Council also notes that increased visibility and use of environmental information and data beyond the developer and Local Planning Authority is envisaged. Reporting requirements against decisions or submissions, would mean additional burdens and costs on developers and decision makers, which may be challenging in terms of viability for some sites. As a result, further clarification would be needed regarding the reporting requirements.

In respect of potential new or amended duties for Local Planning Authorities, the lead in times to develop and potential consequential impacts to existing systems / contracts must be a key consideration as a challenge for implementation.

Mainstreaming monitoring

Question 15: Would you support a more formal and robust approach to monitoring?

[Yes/No].

The County Council would support a more formal and robust approach to monitoring, in principle, subject to provision of adequate resources. In developing the details, further clarification should be given to which relevant consents / permissions and which relevant plans would require mitigation monitoring. Clarity is required whether it is the intention for a monitoring requirement that is only for projects that require screening and then require further environmental assessment – for example, the Category 1 and Category 2 screened in accordance with the proposals being consulted on. It is noted that the consultation document does acknowledge that minerals and waste development already cover the requirement to an extent, so clarification as to what further changes might there be for mineral and waste related development would be welcomed.

Question 16: How can the government use monitoring to incentivise better assessment practice?

The County Council considers that there is a need for a database of baseline and post-development monitoring results, which can be interrogated to support better mitigation / compensation measures, and better decision making.

The results of the monitoring of avoidance / mitigation / compensation techniques in previous applications should, through wide analysis of datasets, create freely accessible results that can be used by applicants / their consultants, to feed into future applications. Monitoring should provide a greater level of certainty regarding the potential impacts of a project on environmental receptors, and the effectiveness of any proposed avoidance mitigation / compensations measures.

Where such avoidance / mitigation / compensation measures have been found to be successful, they can be used to set new evidence-based industry standards proposed in applications. If applicants propose a new, untested measure when a proven measure exists, this potentially should be viewed negatively by the decision maker.

The County Council expects there to be clear consequences of not undertaking effective monitoring to a sufficient level to incentivise developers to do it.

The County Council would also question whether an independent national body, made up of experts with practical experience, may be better informed to collate enforceable outcomes from substandard mitigation measures.

Question 17: How can the government best ensure the ongoing costs of monitoring are met?

The County Council considers that ongoing costs must be met by the developer and should include potential monitoring, enforcement and new / amended duties costs to ensure there is necessary Local Planning Authority resource in place.

Question 18: How should the government address issues such as post-decision costs and liabilities?

If bonds, escrows and other systems are being considered for very long-term developments, these mechanisms need to be secured at a very early stage in a development and need to continue to exist over a considerable amount of time, taking into account delays in the lifetime of a project and long-term impacts of change. In developing the details, increased reporting requirements and potential for duplication across different regimes should be considered. Furthermore, the County Council recommends consideration of funding from a penalty payment, or a buffer fund could possibly be explored.

Unlocking data

Question 19: Do you support the principle of environmental data being made publicly available for future use?

The County Council supports the principle of environmental data being made publicly available. Data sharing will be key to inform further development of mitigation measures, understanding and boosting their effectiveness countrywide. Data should be shared using common standards and databases to ensure it can be effectively utilised to deliver real improvements to the environment.

However, this would rely upon digitalisation of planning services and increasing online access. In pursuing this objective, it needs to be recognised that making changes to existing systems is not always straight forward and systems are not uniform. The ability to change and build systems to meet ever increasing requirements needs to be considered along with lead in times. Furthermore, systems are not developed in house and are often developed by others with maintenance, hosting and service arrangements. Procurement rules require consideration of contracts and systems are therefore liable to change, with consequential data migration impacts.

It should be noted that members of CIEEM are already required to share collected biodiversity data with local biological records centres (unless not permitted to do so by a client), and where a protected species licence is required, submission of relevant data is required by the licence. Natural England already makes limited data freely available on MAGIC, and records centres generally charge a small fee to issue a data search report. If more data was freely available, there may be a need for funding to support records centres linking to a central system to enable that process to be implemented. This would, however, boost the resilience of data sharing processes moving forwards.

Question 20: What are the current barriers to sharing data more easily?

Data for scheme monitoring is not widely freely available. It is also the case that where data may have been collected, a lack of a centralised system to identify, store and share data within means that individuals may not be aware of the data.

Collecting data in such a way that it is easily interrogated can provide a range of functions (e.g. population monitoring / effectiveness of mitigation). This could be challenging if not implemented effectively. There will be costs associated with digitising and validating the data and it should be noted, however, that some groups may not want their data publicly accessible (e.g. in relation to badgers).

If it is intended that data be shared and published widely, clear powers and purpose to do so with clarity about what exactly can be shared, what permissions are required, with whom, when and how within regulation and guidance would be helpful. It should also cover how long data can be stored and published for to inform future assessments.

In developing plans to share data more easily, the following should also be considered/clarified:

- Is it proposed that the developer submit the required reporting data in a format to the Local Planning Authority via a digital system ready for sharing, or that they submit a return where the data needs to be extracted and collated to populate required submissions to Government.
- A clear definition of what data is required and what quality expectations it should meet.
- Resource implications, e.g. data collation, quality and error checking stages. Gaps in data.
- Lead in times for system development and testing.

Currently data is in a number of different places (e.g. local biological records centres / Natural England data) and does not appear to be fully utilised for driving improvements in the designing of mitigation / compensation techniques (e.g., Natural England licensing data). If current monitoring data is not analysed, the County Council would question how collecting more data will result in improvements for nature.

Furthermore, appropriate protection policies must be in place to ensure the standards of data remain high quality to better inform development.

It should also be noted that commercial sensitivity can result in pre-application data not being shared resulting in surveys having to be redone if a developer changes.

Question 21: What data would you prioritise for the creation of standards to support environmental assessment?

High quality baseline data should support any environmental assessment, along with evidence-based avoidance, mitigation and compensation measures. The avoidance, mitigation and compensation measures should be chosen following research into their effectiveness, gathered through the monitoring and analysis of previous similar projects / plans.

There is a need for an ability to access data easily and understanding all information is available in one place. For example, local biological records centres should be able to share their data centrally to enable population trends to be more easily visible across the country.

The County Council would also recommend making an applicant legally required to upload data to the Local Record Centre (linking to a central database) when submitting a planning application, and acknowledging that once the data has been submitted, that it is freely available.

Reporting against performance

Question 22: Would you support reporting on the performance of a plan or projects against the achievement of outcomes? [Yes/ No].

The County Council supports the reporting of performance of a plan / project against the achievement of outcomes to ensure it is possible to demonstrate that the mitigation has been achieved.

The County Council considers that it would be important to report on the achievement of outcomes as well as identifying appropriate indicators, appropriately funding the monitoring process and identifying which body will undertake the monitoring and reporting.

Question 23: What are the opportunities and challenges in reporting on the achievement of outcomes?

One challenge faced by the County Council is the lack of accurate baseline data, as well as the different ways the data has been collected/presented at a project level. This may make collecting national datasets, interrogating data and providing valid statements regarding high level outcomes difficult.

Costs associated to Local Planning Authorities in gathering any data linked in to reporting requirements may also be a challenge. The County Council considers that the new processes will need to be simple to enable Local Planning Authorities to gather and disseminate any data.

A further challenge relates to the way data is collected / analysed to ensure it is possible to carry out detailed analysis to improve submissions / mitigation.

To ensure valid outcomes are delivered, and data can be collected, analysed and findings implemented, sufficient funding and resourcing of Local Planning Authorities will be vital. It must be clear what parties will be responsible for collecting, storing and monitoring the data.

There is also a need for clear mechanisms to require the developers / management companies to provide any data required for the reporting to ensure that when sites are sold, then the requirement remains.

The format and content of consolidated returns will need to be established to ensure that there is consistency – and avoiding duplication and unnecessary burdens and costs to those involved. Skills and expertise will also need to be developed to ensure effective implementation and this must be considered in relation to the lead in times to build in the change to the processes.

In consideration of the historic environment, it will be important to have a base level assessment against which to measure change as for historic environment, such detail does not generally exist and may only be provided through the fieldwork stage of a development or other proposal. With appropriate funding, it may be possible for Historic Environment Records to be involved in this process.

Next Steps

Question 24: Once regulations are laid, what length of transition do you consider is appropriate for your regime?

- i) 6 months
- ii) 1 year
- iii) 2 years

Please state regime.

The County Council considers that 1-2 years would be appropriate, but the guidance and details of the proposals must be released sufficiently in advance to enable all those involved in development to prepare accordingly. Any shorter timeframe is not considered to be sufficient to prepare for changes which are yet to be developed and many details of which remain outstanding.

Question 25: What new skills or additional support would be required to support the implementation of Environmental Outcomes Reports?

The County Council considers that resourcing is a continual challenge and new skills as well as resources will be required to ensure that EOR can be successfully implemented. This includes ensuring that Local Planning Authorities have the necessary staffing and expertise to be able to successfully implement, monitor and manage the EOR process.

However, in the absence of further details, it is difficult to fully respond to this question. Paragraph 11.8 states that the Government will support and work with authorities to ensure that authorities have the capability and skills to provide an efficient service and feel confident they can protect our environment and deliver levelling up. This is welcomed.

From the information available, it is likely that additional support and skills will be required around digital data management and reporting skills; working with large complex data sets, including managing data returns relating to possibly 66+ indicators; system development and monitoring resources.

Question 26: The government would be grateful for your comments on any impacts of the proposals in this document and how they might impact on eliminating discrimination, advancing equality and fostering good relations.

The County Council has no comments.