



NPA/25/007

Dartmoor National Park Authority

10 January 2025

Local Development Scheme (LDS)

Report of the Senior Planning Policy Officer and Director of Spatial Planning

Recommendation: **That Members adopt the Local Development Scheme**

1 Introduction

- 1.1 The Local Development Scheme (LDS) is a public statement setting out the milestones for the preparation and adoption or publication of planning documents including the Dartmoor National Park Authority's Local Plan review programme.
- 1.2 The LDS must publicly set out which local development documents we are to prepare, which of these are development plan documents, which area they cover, whether they are to be prepared with another authority and the timetable against which they will be prepared.
- 1.3 Although not a statutory requirement, the Dartmoor LDS also sets out the indicative timescale for the preparation of Supplementary Planning Documents (SPD).

2 Background

- 2.1 The Dartmoor Local Plan was adopted in December 2021 and must be reviewed within 5 years of adoption (by December 2026). The review process comprises an assessment as to whether the current Local Plan is still fit for purpose taking into account monitoring of Local Plan outcomes, demographic or other changes to the plan area and legislative or policy changes. The outcome of the review is a decision to either retain the local plan without any changes, undertake a partial update of the Local Plan or prepare a new Local Plan.
- 2.2 The Levelling Up and Regeneration Act 2023 makes provision for changes to the plan making process, including the potential for further regulations to specify the timescale for plan preparation and the introduction of National Development Management Policy. The Government have advised these changes will be implemented in the summer or autumn 2025 and if some or all of these are implemented, they would very likely impact on the outcome of the local plan review.

In addition, the proposed changes may impact on the process of the review and the type of evidence needed to support the review process.

- 2.3 In addition to this, a Ministry for Homes Communities and Local Government newsletter (MHCLG) was published before Christmas which requested that all local planning authorities produce an updated LDS within 12 weeks of the publication of the updated NPPF, (this being 6 March 2025). The newsletter set out that specific dates for consultation and submission of a Local Plan should be included.

3 Updating the LDS

- 3.1 It is important that the Local Development Scheme remains up to date and clearly reflects the programme of document preparation and consultation. The current LDS sets out a timetable for reviewing the Local Plan as well as the Statement of Community Involvement and updating the Design Guidance SPD but due to a lack of capacity these works have not commenced in line with the published timescales.
- 3.2 In addition, the review of the Local Plan was intended to commence in the summer of 2024 and conclude in the summer of 2026. This is an onerous timescale for a review process, particularly when the Local Plan itself would only have been adopted for 2.5 years when the review process would begin. The current LDS timescales are:

Local Development Document	2022/23	2023/24	2024/25	2025/26
Local Plan (DPD) review	-	-	- Call for evidence - Scoping paper - Evidence review - Draft Report	- Final Report (summer 2026)
Statement of Community Involvement		- Consultation - Adoption		
Housing SPD	- Consultation - Adoption		-	-
Design Guidance SPD	- Consultation	- Adoption	-	-

- 3.3 Given that the current LDS timetable has been delayed due to staff capacity a new updated LDS is required and this provides an opportunity to schedule a more focused and condensed Local Plan review which could align with proposed legislative changes and work being undertaken for the Partnership Plan (also known as the Management Plan).
- 3.4 The MHCLG newsletter sets out the requirement to timetable when LPAs will be consulting and submitting a new Local Plan. For the majority of LPAs whose housing figures have been significantly changed by the publication of the updated NPPF, it is clear that a new Local Plan will be required, and its preparation can be

scheduled. However, the impact of the NPPF update for Dartmoor National Park is less direct and without completing the review process it is not clear whether an update to the Local Plan is required. The Government has made clear their intention to implement wider changes to the planning system through the Levelling up and Regeneration Act 2023 (LURA) and it is very likely that the Local Plan will require an update following these changes. An update to the Local Plan is timetabled to be completed before the end of the second 5year review period (December 2031) as it is assumed that the implementation of the LURA will come into force during this time.

- 3.5 Scheduling the Local Plan update within this iteration of the LDS satisfies the request by the MHCLG to provide a date for a new Local Plan and as a specific date is not known it identifies the latest time when a Local Plan update may be required. This ensures that an update is not undertaken until one is required and the benefits would be of most value as significant changes to the Local Plan are likely to be required. If it becomes clear that an update is required at an earlier time than there is the option to update the LDS to reflect an earlier timetable. A suitable time to revisit the LDS to check whether it needs changing would be following the review of the Local Plan.

3.6 The proposed timetable is shown below:

Local Development Document	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32
Local Plan (DPD) review	Evidence review Consultation	Final report (December 2026)					
Local Plan (DPD) update				Evidence review Issues and Options consultation	Ongoing Plan preparation	Draft Local Plan consultation Submission consultation	Submission to Secretary of State Examination Adoption
Statement of Community Involvement	Consultation Adoption						
Design Guidance SPD			Consultation Adoption				

4 Local Plan Review 2025/26

- 4.1 This condensed process still ensures the review is completed by December 2026 and provides time for public consultation at a meaningful stage in the process when sufficient evidence is available. During the Local Plan review process the Planning and Sustainability Panel would convene quarterly to allow regular updates to Members:

Summer- Autumn 2025 (July - Dec 2025)

- Commission technical reports
- Planning and Sustainability Panel Update September 2025
- Draft Interim Statement and Topic papers
- Planning and Sustainability Panel Update December 2025

Winter 2026 (Jan – Feb 2026)

- Authority Update on interim statements and consultation – January 2026
(*subject to confirmation by Members*)
- Public Consultation on interim statement

Spring – Summer 2026 (May - July 2026)

- Planning and Sustainability Panel Update – May 2026
- Summary Report and Topic Papers
- Adoption – by Authority July 2026.

5 Financial Implications

- 5.1 The adoption of the LDS sets a timetable for plan review and Local Plan update. The delivery of this scheme therefore has resource implications for the Authority in respect of staff resource (principally forward planning) for document preparation, consultation; staff resources relating to specialist input; specific research or appraisal requirements; publicity and publication.
- 5.2 The LDS review covers more than one financial year and has links to the review of the National Park Management Plan (Dartmoor Partnership Plan) and work on Race to Zero. Currently there are a number of ring-fenced reserves totalling £95,000 allocated for the National Park Management Plan, Local Plan, Race to Zero and the Authority's Climate Action Plan. Money can be drawn down as required to support these programmes of work. It is estimated that these reserves will adequately address the financial impacts of the Local Plan review.

6 Conclusion

- 6.1 The National Planning Policy Framework, together with recent appeal decisions nationally, highlights the importance of maintaining an up-to-date development plan and evidence base.

- 6.2 This LDS establishes an important continued commitment from the Authority to maintain a robust and up to date development plan, giving it the ability to make clear, justified and defensible decisions on planning applications within the National Park.

LIZ PAYNE AND DEAN KINSELLA

Attachments : Appendix 1 - Local Development Scheme January 2025

20250207 Local Development Scheme



DARTMOOR LOCAL PLAN
guiding planning applications in Dartmoor National Park

Local Development Scheme (LDS)



1. Introduction

- 1.1. Under section 67(1) of the Environment Act 1995, Dartmoor National Park Authority (DNPA) is the Local Planning Authority (LPA) for the entire area of Dartmoor National Park. Those responsibilities include the mineral and waste planning functions for the area. The Authority also prepares the Dartmoor National Park Partnership Plan (also known as the Management Plan); these are the over-arching strategic documents for the National Park Vision and set the vision and objectives to guide the future of the National Park over a 10 to 20 year period. The current Partnership Plan was adopted in 2021, there is a consistent vision (The Vision 2045) for Dartmoor's future which is delivered through the Partnership Plan and Local Plan.
- 1.2. Preparation of a Local Development Scheme (LDS) is a requirement of the 2004 Planning and Compulsory Purchase Act (as amended by the 2011 Localism Act). The LDS must publicly set out which local development documents we are to prepare, which of these are development plan documents, which area they cover, whether they are to be prepared with another authority and the timetable against which they will be prepared. The LDS must be formally adopted.
- 1.3. This LDS is a public statement of the programme for preparing and reviewing the formal planning documents for Dartmoor National Park.

This includes:

- Development Plan Documents (identifying strategic priorities and containing policies to address these, for example the Local Plan)
- Supplementary Planning Documents (detailed advice and guidance which adds to adopted policy, such as Design Guidance)
- Other documents, including Local Development Documents (including 'procedural' documents such as the Local Development Scheme or Statement of Community Involvement)

2. Current plans in Dartmoor National Park

2.1. The Dartmoor Local Plan (2018-2036) for Dartmoor National Park was adopted in December 2021. It is a comprehensive Local Plan containing strategic policies, development management policies, site allocations, and minerals and waste policies. It is supported by the extant Design Guide Supplementary Planning Document (SPD) and Housing SPD.

Document name	Current status
<p>Local Plan (DPD - Development Plan Document)</p> <p>Sets out the vision, aims and strategy for spatial development in the Dartmoor National Park, provides detailed development management policies, allocates sites for housing and other development, sets out policies for Minerals and Waste development.</p>	Adopted (2021)
<p>Design Guidance (SPD - Supplementary Planning Document)</p> <p>Guidance to encourage a high standard of design in Dartmoor National Park</p>	Adopted (2011)
<p>Housing (SPD - Supplementary Planning Document)</p> <p>Guidance to support the delivery of housing in Dartmoor National Park.</p>	Adopted (2023)
<p>Statement of Community Involvement (SCI)</p> <p>Sets out the scope and arrangements for consultation and participation for each local development document</p>	Adopted (Revised 2018)
<p>Local Development Scheme (LDS)</p> <p>The timetable for preparation of local development documents (e.g. Local Plan) and Supplementary Planning Guidance</p>	Current (Revised 2025)

Table 1. Current local planning documents

3. Local Development Scheme

- 3.1. This document will include commentary on the complete range of documents the Authority intends to prepare and review. The LDS is required to cover the preparation of DPDs but Statements of Community Involvement and Supplementary Planning Documents are included for completeness.
- 3.2. The Authority intends to prepare or review the following documents within the timeframe of this LDS. Key milestones for their preparation/review are set out in Table 2.
- 3.3. **Local Plan (Development Plan Document)**
- 3.4. The Local Plan was prepared from 2016, including informal and formal consultation stages and public examination in early 2021. The Inspector's Report was received in November 2021 and the Local Plan was adopted in December 2021 at which point the previous DPDs were deleted.
- 3.5. The National Planning Policy Framework states:
- “Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary¹⁹. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future.” (NPPF para 34)*
- [Footnote 19 states: Reviews at least every five years are a legal requirement for all local plans (Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012).]*
- 3.6. A timetable for the review of the Local Plan has been proposed within 5 years of the Local Plan being adopted (that being December 2026). The scope of the Local Plan review will be that of the entire Local Plan; it will include the whole area of Dartmoor National Park, and include consideration of strategic policies, development management policies, allocations, and minerals and waste policies.
- 3.7. The outcome of that review is unknown, and despite recent changes to the NPPF, these alone are not conclusive that an update of the strategic policies of the Local Plan is required. The Authority acknowledges the Government's intention to implement wider changes to the planning system through the Levelling up and Regeneration Act 2023 and as such it is very likely that the Local Plan will require an update within the second 5year review period. As such an update to the Local Plan is timetabled to be completed before the end of the second 5year review period (December 2031). The timescales are shown in table 2 and paragraph 3.18. If subsequently, the review process or other legislative changes identify a requirement to update the Local Plan sooner, than this LDS will be revised and a new timescale published.

3.8. **Supplementary Planning Documents (SPDs)**

- 3.9. The Authority has two adopted SPDs, the Housing SPD (2023) and the Design Guide (2011). Whilst outside the necessary scope of this LDS it is helpful to set out the Authority's intentions regarding the review of these SPDs, as follows.
- 3.10. The Authority adopted the Housing SPD in 2023 and offers additional guidance to the Local Plan policies on affordable and market housing, custom and self-build homes, rural workers housing, and the delivery of housing sites.
- 3.11. The Authority intends to review the Design Guide SPD. This will ensure the guidance is up to date and aligns with Local Plan policies, for example on sustainable construction and space and accessibility standards. The scope of the Design Guide SPD may also include a design code dimension to reflect government policy in that area.
- 3.12. The Authority also has additional guidance which has been prepared jointly with partners. This has not been adopted as SPD. The South Hams SAC guidance was prepared in partnership and was endorsed by the Authority in October 2019. Joint Biodiversity Net Gain guidance was first published in 2021 as technical guidance and was updated in April 2024 to align with legislation.

3.13. **Statement of Community Involvement**

- 3.14. The Planning and Compulsory Purchase Act 2004 requires that LPAs produce a Statement of Community Involvement (SCI). The Authority prepared and adopted a SCI, *Planning: Having Your Say*, in November 2018. It is considered necessary to review the SCI prior to the review of the Local Plan to ensure that the consultation and engagement process meets the latest requirements and best practice.

3.15. **Joint working and other plans**

- 3.16. Although joint development plan documents can be prepared with other planning authorities, there is currently no intention to prepare joint planning documents. In April 2016 the Authority agreed¹ not to enter formally into joint local plan arrangements with Plymouth, West Devon and South Hams; or with Exeter, Teignbridge, Mid-Devon and East Devon. It has committed to work closely with both groups in respect to evidence gathering and meeting the Duty to Co-operate for both the Dartmoor Local Plan, and the respective plans of other LPAs.
- 3.17. The Authority maintains close liaison with Devon County Council, which is the mineral planning authority for the rest of Devon outside Plymouth and Torbay (and Dartmoor) in preparing evidence and monitoring to inform and support minerals policies.

¹ Authority Report April 2016 http://www.dartmoor.gov.uk/_data/assets/pdf_file/0007/739609/20160401-Authority-Reports.pdf

Local Development Document	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32
Local Plan (DPD) review	Evidence review Consultation	Final report (December 2026)					
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Design Guidance SPD			Consultation Adoption				

Table 2. Dartmoor National Park Authority Local Development Scheme – Programme 2024-2028

3.18. With reference to the above formal LDS timescales, it is anticipated that the review of the local plan will take place as follows.

Phase 1 Review of evidence

This phase will include:

- Collection of evidence
- Drafting of an interim paper and Topic Papers

This phase is planned to start in summer 2025

Phase 2 Consultation

This phase will provide the opportunity for public consultation on the interim paper and Topic Papers.

This phase is planned to start in early 2026.

Phase 3 Final Report

The interim report will be revised to consider stakeholder views on the conclusions and recommendations made. The final report will be considered formally by the Authority.

This phase is planned to conclude in summer 2026.

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4. Monitoring and review

4.1. Legislation requires local planning authorities to produce an Authority Monitoring Report to assess progress on the implementation of the LDS. The Authority also maintains and publishes other monitoring and reports, including the Brownfield Register, the Self-Build Register, and the annual Infrastructure Funding Statement.

4.2. Monitoring systems should assess:

- whether policies in local development documents are being implemented effectively, and whether targets and/or milestones are being met
- the impact of the policies with regard to national, regional and local targets
- the effectiveness of the policies and proposals with regard to the achievement of strategic objectives, and whether modification or replacement is required.

Where policies or proposals need to be changed, the annual review should indicate how that will be achieved.

4.3. A robust monitoring framework is now set out in the Authority's Annual Monitoring Report published each year. The review and monitoring of the Dartmoor National Park Partnership Plan and its associated State of the Park Report also provides evidence and material for assessing the documents in the Local Plan.



NPA/25/008

Dartmoor National Park Authority

7 February 2025

Fees and Charges 2025/26

Report of the Head of Business Support

Recommendation: **That subject to any amendments proposed at the meeting, Members:**

- (i) **approve the recommendations made in section 3 of this report; and**
- (ii) **approve the 2025/26 schedule of fees and charges as set out in Appendix 2**

1 Background

- 1.1 The Authority is responsible for a number of services for which fees are permitted to be charged in order to offset the costs involved. The Government requires that local authorities (including National Park Authorities) should raise revenue wherever possible to cover costs, which means that fees and charges (which include suggested donations) are reviewed and approved on an annual basis.

2 Current Situation

- 2.1 The Authority needs to consider the fees and charges for each financial year during the budget setting process. Whilst many are not a major source of income, they do contribute to meeting the costs of delivering some services. The charges applied may be the difference between providing a service and having to withdraw it all together. The Authority is also mindful of the Government's clear message that National Park Authorities need to be generating more income locally.
- 2.2 The fees and charges for the current year were approved by the Authority in March 2024 (NPA/24/12). Subsequent amendments were brought to Members and approved in July 2024 (NPA/24/031).
- 2.3 The Medium-Term Financial Plan 2024/25 to 2026/27 (MTFP), which was approved by Members in March 2024 (NPA/24/13) estimated a budget gap (deficit) of £510,000. In November 2024 Members agreed to use reserves to balance the revenue budget for 2025/26 (NPA/24/039). Since then the Government has

announced an increase in employer National Insurance contributions which will add another £90,000 in costs to the Authority. Local authorities and other public bodies are receiving some assistance from the Government with these costs; we have received no indication that Defra will provide any assistance to National Park Authorities. Members have also agreed to use reserves to keep the National Park Visitor Centre at Princetown open until the end of October 2025 at a cost of circa £50,000.

- 2.4 At the time of writing this report the Authority is still awaiting confirmation from Defra regarding the funding settlement for 2025/26 and beyond. However, officers have been working on the budget for 2025/26 and revised MTFP for 2025/26 - 2027/28. That process is zero-based and officers have been identifying areas to cut/reduce expenditure. At present we estimate a need to take circa £300,000 from reserves to balance the 2025/26 revenue budget. This financial context emphasises the need to look at local income generation; fees and charges are part of this.

3 Fees and charges for 2025/26

- 3.1 The proposed schedule of fees and charges for 2025/26 can be found on Appendix 2. At the Authority meeting held on 2 February 2024, Members agreed to the principle of annually raising car parking charges in line with the Consumer Price Index (CPI) reported in September from the previous year with a minimum increase of 2% per annum (NPA/24/06). September CPI was 1.7%.
- 3.2 Car parking charges provide the Authority with income to help maintain key infrastructure and the surrounding environment. Unlike the other fees and charges, which normally come into force from 1st April 2024, the car park charges will become effective after the required statutory advertisement/notification.
- 3.3 Given the forecast budget deficit for 2025/26 and the Government message regarding local income generation, officers are recommending that Members agree to a 5% increase in car park charges for 2025/26. It should be noted that, for a number of years, the Authority did not increase car park charges above inflation, in fact they have predominately been below inflation increases.
- 3.4 Members may recall that in 2024 officers provided an amendment to the 2024 fees and charges to re-introduce and increase the charges for the pre-application service. This service recommenced in June 2024. Members had previously raised concerns regarding whether the charges approved in 2024 were reflective of the staff time and resource required to deliver this service. The reintroduction of this service has been well received by customers and has been well used.
- 3.5 Officers have now undertaken a benchmarking exercise and reviewed the time and resources used to deliver the service. A review of the charges levied by nearby local planning authorities confirmed that the Authority's current fees and charges are (in most cases) significantly lower than those of neighbouring planning authorities. The results of the benchmarking can be found at Appendix 3.

- 3.6 In considering all elements of the review undertaken by officers we are proposing and increased charges across all our pre-application service to better reflect the time and resources it takes to provide the advice.
- 3.7 All of the recommended changes to fees and charges can be found in Appendix 2 with changes highlighted where applicable.

4 Financial Implications

- 4.1 Local income generation is an increasingly important source of revenue for the Authority. The income from car park charges and other fees helps the Authority maintain infrastructure and related services that help people access the National Park. The proposed increases in pre-application and car park charges will help us maintain facilities and services.
- 4.2 The schedule of fees and charges, subject to Members approval, will be incorporated into the 2025/26 Revenue Budget, which will be presented for approval by the Authority in March 2025.

5 Equality and Impact Assessment

- 5.1 The implications for access to services and the economy of the area are fully considered and addressed in all the Authority's policies, especially when considering charging for services. Consideration is given to proactively engaging those who may not otherwise access Dartmoor, being mindful of potential barriers and balancing the need to generate income and maintaining budgets that are flexible and responsive to the needs of service users.

6 Conclusion and Recommendation

- 6.1 Members are recommended to approve the revised charges as detailed in Appendix 2. The proposed changes to car park charges will need to be advertised prior to implementation. The other changes would take effect from the start of the new financial year.

ANGELA STIRLAND

Background Papers: NPA/24/06, NPA/24/12, NPA/24/031

Attachments: Appendix 1 - Income to date for 2024/25
Appendix 2 - Proposed fees and charges 2025/26
Appendix 3 - Planning Fees Benchmark exercise 2024/25

Appendix 1 to Report NPA/25/008

<i>Fees and Charges</i>	2023/24 Outturn	2024/25 Budget	2024/25 Actual at Month 9	2024/25 Forecast Outturn
	£	£	£	£
Pre Application Advice	(3,725)	(6,000)	(9,050)	(12,067)
Filming	(3,580)	0	(23,680)	(23,680)
Room Hire & refreshments (Parke)	0	0	0	0
DHFP Membership fees	(1,283)	0	(1,183)	(1,183)
Photocopying	0	0	0	0
Legal Costs recovered	0	0	0	0
Education Guided Walks	(2,124)	(1,000)	(1,097)	(1,097)
Education Events	(796)	(700)	(731)	(731)
Education Walks	(4,630)	(3,000)	(2,420)	(3,000)
Ranger Ralph	(972)	(1,200)	(600)	(800)
Donations	(16,242)	0	(16,435)	(18,561)
<i>Car Parking:</i>				
Princetown	(48,059)	(45,000)	(38,094)	(47,000)
Haytor Upper	(41,793)	(10,000)	(8,511)	(10,000)
Haytor Lower	(17,665)	(65,000)	(59,639)	(73,000)
Postbridge	(28,927)	(30,000)	(23,972)	(30,000)
Meldon	(36,397)	(40,000)	(32,831)	(40,000)
<i>Total</i>	(206,192)	(201,900)	(218,243)	(261,119)

**DARTMOOR NATIONAL PARK AUTHORITY
FEES AND CHARGES 2025/26**

Appendix 2 to Report No. NPA/25/008

Description of Charges Levied (or Donations suggested)	Unit
Administration	
Photocopying - Black and White (charges for sizes over A3 as for plans below)	A4 per side A3 per side
Photocopying - Colour (charges for sizes over A3 as for plans below)	A4 per side A3 per side
Plan Copying – Colour (subject to copyright)	A4 per side
	A3 per side
	A2 per side
	A1 per side A0 per side
<i>NB: Copying charges that total less than £1 will be waived</i>	
Microfilm Copying	
Development Management	
Planning Application Fees	
Pre Application Fees:	
Class A: Residential between 31-149 dwellings / Non-residential floor space 5,000-9,999 sq.m - 1 meeting	
Class A: Additional meeting fee	
Class B: Residential between 10-30 dwellings / Non-residential floor space 1,000-4,999 sq.m - 1 meeting	
Class B: Additional meeting fee	
Class C: Residential (including holiday lets) between 3-9 dwellings / Non-residential floor space 500-999 sq.m - 1 meeting	
Class C: Additional meeting fee	
Class D: Residential 1-2 dwellings (including replacement dwellings) including change of use to, conversion & holiday lets / Non-residential floor space up to 499 sq.m - 1 meeting	
Class D: Additional meeting fee	
Class E: Advertisements / telecommunications proposals/ Change of use where no operational development (except residential / holiday let)	
Class E: If a case officer considers a site visit is necessary	
Class F: Listed Building Advice	
Class F: Additional meeting fee	
Class G: Other minor development including agricultural based development	
Class G: If a case officer considers a site visit is necessary	
Class H: Renewable energy (Householder) - solar, wind and hydro.	
Class H: Renewable energy (Commercial) - solar, wind, hydro	
Class H: Additional meeting fee	
Class I: Household advice (excluding site visit)	Planning Officer to determine if site visit required
Class I: If a case officer considers a site visit is necessary	

2024/25 Rates (VAT @ 20%) £			2025/26 Rates (VAT @ 20%) £		
NET (£)	VAT (£)	GROSS (£)	NET (£)	VAT (£)	GROSS (£)
0.33	0.07	0.40	0.33	0.07	0.40
0.33	0.07	0.40	0.33	0.07	0.40
0.42	0.08	0.50	0.42	0.08	0.50
0.42	0.08	0.50	0.42	0.08	0.50
0.42	0.08	0.50	0.42	0.08	0.50
0.83	0.17	1.00	0.83	0.17	1.00
2.50	0.50	3.00	2.50	0.50	3.00
4.17	0.83	5.00	4.17	0.83	5.00
5.83	1.17	7.00	5.83	1.17	7.00
As photocopying			As photocopying		
NET (£)	VAT (£)	GROSS (£)	NET (£)	VAT (£)	GROSS (£)
See "Government Scale Charges"			See "Government Scale Charges"		
600.00	120.00	720.00	720.00 (only to agree PPA)	144.00	864.00
300.00	60.00	360.00	300.00	60.00	360.00
400.00	80.00	480.00	2500.00	500.00	3000.00
200.00	40.00	240.00	200.00	40.00	240.00
300.00	60.00	360.00	720.00	144.00	864.00
150.00	30.00	180.00	150.00	30.00	180.00
150.00	30.00	180.00	450.00	90.00	540.00
50.00	10.00	60.00	100.00	20.00	120.00
150.00	30.00	180.00	450.00	90.00	540.00
			100.00	20.00	120.00
150.00	30.00	180.00	210.00	42.00	252.00
75.00	15.00	90.00	100.00	20.00	120.00
83.33	16.67	100.00	210.00	42.00	252.00
41.67	8.33	50.00	100.00	20.00	120.00
150.00	30.00	180.00	210.00	42.00	252.00
166.67	33.33	200.00	450.00	90.00	540.00
50.00	10.00	60.00	100.00	20.00	120.00
150.00	30.00	180.00	210.00	42.00	252.00
200.00	40.00	240.00	100.00	20.00	120.00

DARTMOOR NATIONAL PARK AUTHORITY

Description of Charges Levied (or Donations suggested)	Unit
Youth Ranger Programme	Annual subscription
Higher Uppacott	Bespoke Events
Legal Services	
Public Path Orders:	
Public path orders: Advertisements x 2	Per advert
Preparing order, all officer time, administration, postage, legal costs, site visits, notices, negotiations with users etc.	Unopposed orders
	Additional orders linked to above
	Opposed orders
	Temporary closures
	Extending a Temporary closure & submission to Secretary of State
	Informal Consultations (includes consulting with interested parties, summarising responses and Authority Report)
Legal charges	Per hour
Copy / Inspection of Deeds or Documents (held in secure storage)	Per document
Section 106 agreements	Per hour
Certification of a document	Per document
Supply data to:	Non Public Body
Environmental Information Regulations	
Disbursement Costs:	
Photocopying - Black and White (charges for sizes over A3 as for plans below)	A4 per side
	A3 per side
Photocopying - Colour (charges for sizes over A3 as for plans below)	A4 per side
	A3 per side
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	A3 per side
	A2 per side
	A1 per side
	A0 per side
Microfilm Copying	
Staff Time: For every members of staff or agency staff involved in considering or dealing with a request for information	Search for Information. Identification & location of information. Retrieval of information. Copying of
Filming on DNP Land (owned or managed) per day	
Feature films	
TV Feature / Mini series / Drama	
TV Documentary / Children's	

2024/25 Rates (VAT @ 20%) £			2025/26 Rates (VAT @ 20%) £		
50.00	ZERO	50.00	50.00	ZERO	50.00
Delegated to Director of Conservation and Communities			Delegated to Director of Conservation and Communities		
NET (£)	VAT (£)	GROSS (£)	NET (£)	VAT (£)	GROSS (£)
See Below			See Below		
£1,000.00 plus advertising costs (plus VAT)			£1,000.00 plus advertising costs (plus VAT)		
£400.00 plus advertising costs (plus VAT)			£400.00 plus advertising costs (plus VAT)		
£2,000 - £3,000 plus advertising costs (plus VAT)			£2,000 - £3,000 plus advertising costs (plus VAT)		
£600.00 plus advertising costs (plus VAT)			£600.00 plus advertising costs (plus VAT)		
£60 per hour + Advertising costs + VAT (minimum charge £500)			£60 per hour + Advertising costs + VAT (minimum charge £500)		
400	80	480	400	80	480
80-140	OOS	80-140	80-140	OOS	80-140
37.50	7.50	45.00	37.50	7.50	45.00
Not applicable - service provided by DCC			Not applicable - service provided by DCC		
4.17	0.83	5.00	4.17	0.83	5.00
40.00	8.00	48.00	40.00	8.00	48.00
NET (£)	VAT (£)	GROSS (£)	NET (£)	VAT (£)	GROSS (£)
0.33	0.07	0.40	0.33	0.07	0.40
0.33	0.07	0.40	0.33	0.07	0.40
0.42	0.08	0.50	0.42	0.08	0.50
0.42	0.08	0.50	0.42	0.08	0.50
0.42	0.08	0.50	0.42	0.08	0.50
0.83	0.17	1.00	0.83	0.17	1.00
2.50	0.50	3.00	2.50	0.50	3.00
4.17	0.83	5.00	4.17	0.83	5.00
5.83	1.17	7.00	5.83	1.17	7.00
As photocopying			As photocopying		
£25 per hour (pro rata)			£25 per hour (pro rata)		
VAT will only be charged if the information could Be obtained elsewhere			VAT will only be charged if the information could Be obtained elsewhere		
NET (£)	VAT (£)	GROSS (£)	NET (£)	VAT (£)	GROSS (£)
From £2,500 plus VAT			From £2,500 plus VAT		
From £500 plus VAT			From £500 plus VAT		
From £250 plus VAT			From £250 plus VAT		

DARTMOOR NATIONAL PARK AUTHORITY

Description of Charges Levied (or Donations suggested)	Unit	2024/25 Rates (VAT @ 20%) £			2025/26 Rates (VAT @ 20%) £		
		NET (£)	VAT (£)	GROSS (£)	NET (£)	VAT (£)	GROSS (£)
Advertising / Promotional		From £1,200 plus VAT			From £1,200 plus VAT		
Commercial Photo Shoot		From £1,000 plus VAT			From £1,000 plus VAT		
National Park staff time		From £60 per hour / £360 per day plus VAT			From £60 per hour / £360 per day plus VAT		
Aerial Footage (including stock footage)		Price on application			Price on application		
News, current affairs or educational / schools		Free of charge			Free of charge		
Officer support for Filming and / or Event Management		NET (£)	VAT (£)	GROSS (£)	NET (£)	VAT (£)	GROSS (£)
National Park staff time		£60 per hour / £360 per day plus VAT			£60 per hour / £360 per day plus VAT		
Miscellaneous		NET (£)	VAT (£)	GROSS (£)	NET (£)	VAT (£)	GROSS (£)
Closure of car parks for filming, large scale or other events (minimum charge)	Low season (1 Oct - 31 March)	150.00	30.00	180.00	150.00	30.00	180.00
	High season (1 April - 30 Sept)	300.00	60.00	360.00	300.00	60.00	360.00
Creation of maps for external bodies (GIS)	Fixed cost based on half day	41.67	8.33	50.00	41.67	8.33	50.00
	Hourly rate above half day	16.67	3.33	20.00	16.67	3.33	20.00
Gateway Repair	Per Gateway (per hour - minimum 2hrs)	45.00	9.00	54.00	45.00	9.00	54.00
	Drilling/Gluing per fixing	20.00	4.00	24.00	20.00	4.00	24.00
	Fittings	6.00	1.20	7.20	6.00	1.20	7.20
Gateposts	Repair per post - or individually priced	75.00	15.00	90.00	75.00	15.00	90.00
	Replacement - plus cost of commercially sourced post	75.00	15.00	90.00	75.00	15.00	90.00
Dartmoor Hill Farm Project Membership Scheme		50.00	10.00	60.00	50.00	10.00	60.00
Conservation Works Team - staff time		£60 per hour			£60 per hour		

Appendix 3 to Report No. NPA/25/008

Pre-application Type	DNPA current fees	Teignbridge	South Hams/West Devon	Mid Devon	DNPA Proposed new charges
Class A: Residential between 31-149 dwellings / Non-residential floor space 5,000-9,999 sq.m - 1 meeting	£720	£5,500	£720 (only to agree PPA)	£7,554	£720 (to agree PPA)
Class B: Residential between 10-30 dwellings / Non-residential floor space 1,000-4,999 sq.m - 1 meeting	£480	£2,500	£2,500	£3,790	£2,500
Class C: Residential (including holiday lets) between 3-9 dwellings / Non-residential floor space 500-999 sq.m - 1 meeting	£360	1500	£720	£2,279	£1,000
Class D: Residential 1-2 dwellings (including replacement dwellings) including change of use to, conversion & holiday lets / Non-residential floor space up to 499 sq.m - 1 meeting	£180	£350 - £900	£450	£455-£1191	£500
Class E: Advertisements / telecommunications proposals/ Change of use where no operational development (except residential / holiday let) - 1 meeting	£180	£350	£450	£371	£350
Class F: Listed Building where site visit involved	£180	£300	£210	£294	£250
Class G: Other minor development including agricultural based development - 1 meeting	£100	£350	£210	£371	£250
Class H: Domestic Scale Renewable energy - solar, wind, hydro Free unless site visit required	£180	£900	£210	£294	£250
Class H: Non Domestic Scale Renewable energy - solar, wind, hydro	£200	£900	£210	£512	£900
Class I: Household advice (excluding site visit) *Planning Officer to determine if site visit required	£180	£200	£210	£294	£250
Class I: Household advice (including site visit) *Planning Officer to determine if site visit required	£240	£115	£290	£512	£300



NPA/25/009

Dartmoor National Park Authority

7 February 2025

Dartmoor National Park Authority Updated Climate Action Plan and Emissions Targets

Report of the Partnership Plan and Climate Officer and Assistant Policy Officer.

Recommendation: **That Members adopt the new greenhouse gas emissions targets.**

1 Introduction

- 1.1 In 2019, Dartmoor National Park Authority declared a nature and climate emergency, recognising the urgent need for decisive action to address the climate crisis. In March 2020 DNPA produced and approved an organisational Climate Action Plan, this action plan was part of the Authority's response to the declaration of a climate emergency and established how the Authority as an organisation will seek to achieve its ambition to become carbon neutral against its scope 1 and 2 emissions by 2025.
- 1.2 In October 2023, Members endorsed a review of the current plan and declared support of an updated science-based action plan. The updated action plan sets out a robust framework for reducing emissions and reaching net zero. Developed in collaboration with the Centre for Energy and the Environment at the University of Exeter, the updated plan:
 - Establishes a new baseline for emissions (2023/24)
 - Sets ambitious near-term and long-term targets aligned with climate science
 - Defines a pathway to achieve net-zero emissions by 2050
 - Introduces a robust monitoring framework
- 1.3 This report outlines the key components and recommendations from the updated climate action plan and emissions targets.

2 Background

- 2.1 Greenhouse gas emissions are categorised into three scopes under the Greenhouse Gas Protocol:
 - **Scope 1:** Direct emissions from sources that DNPA owns or controls, such as fuel combustion from vehicles and heating systems.
 - **Scope 2:** Indirect emissions from the generation of purchased electricity consumed by DNPA.

- **Scope 3:** All other indirect emissions that occur as a result of DNPA's activities, such as staff commuting and procurement.

- 2.2 Previously, DNPA set a target to achieve carbon neutrality for scope 1 and 2 emissions by 2025. This target has already been met as DNPA's woodlands offset scope 1 and 2 emissions, allowing the organisation to meet its target without incentivising operational reductions. Additionally, the previous target was not science based and therefore it's exclusion of scope 3 emissions limits the meaningful reduction of DNPA's overall carbon footprint.
- 2.3 The updated climate action plan replaces the previous target with a new emissions target that aligns with the Science Based Target initiative (SBTi). SBTi is a globally recognised framework ensuring that reduction targets are consistent with limiting global warming to 1.5 degrees Celsius. SBTi emphasises setting ambitious, science-based goals for all relevant emissions scopes to drive genuine and measurable progress. The SBTi does not currently assess targets for public bodies and therefore DNPA is not formally signing up to the SBTi. However, such stakeholders are still encouraged to follow these guidelines, which will help DNPA set meaningful emissions reduction goals that contribute to the global effort outlined in the Paris agreement.

3 Key Components of the Updated Climate Action Plan and Emissions Targets.

3.1 Baseline Emissions (2023/24)

The 2023/24 emissions baseline provides a comprehensive view of DNPA's footprint, showing that DNPA's total net emissions were **3,096 tCO₂e** measured across three scopes:

Scope 1: **82 tCO₂e**

Scope 2: **31 tCO₂e**

Scope 3: **4,755 tCO₂e** (dominated by pensions at 4,259 tCO₂e)

Woodland Sequestration: DNPA's woodlands sequester **1,771 tCO₂e** annually by acting as a carbon sink.

- 3.1.2 For the purpose of target setting, woodland sequestration is excluded to align with SBTi guidelines, which specify that natural sinks cannot offset other emissions. Additionally, emissions from pensions (4259 tCO₂e) are excluded due to DNPA's limited influence over investment decisions. DNPA will continue reporting on these categories annually for transparency. Therefore, after removing these categories the net emissions for 2023/24 are **609 tCO₂e** (numbers have been rounded for the purpose of simplicity in the report).

3.2 Target Setting

SBTi recommends setting near-term and long-term targets for emissions reduction. This creates a comprehensive and balanced approach to climate action by focusing on both immediate, actionable steps and more ambitious, long-term goals. Therefore, Exeter University have recommended the following targets to reduce DNPA's emissions footprint:

1. Near-term Target (2030/31):

- **Headline Target:** Reduce scopes 1 & 2 emissions by 42% and scope 3 emissions by 25%, equating to a total reduction target of 438 tCO₂e by 2030.
- **Scope 1&2 Only:** A dedicated target of 66 tCO₂e for scope 1&2, reflecting a 42% reduction from the baseline.

2. Long-term Target (2050):

- Achieve **net-zero emissions by at least 2050**, with at least a 90% reduction from the baseline, setting a final target of 61 tCO₂e by that date.

3.2.1 As mentioned above, woodland sequestration is excluded from the targets in accordance with SBTi guidelines. However, the SBTi framework allows for the possibility of offsetting up to 10% of emissions against the long-term target. Exeter University have recommended that DNPA consider carbon offsetting options for this portion.

3.3 Net-Zero Pathway

The pathway focuses on actionable areas where DNPA has direct influence and outlines three ambition scenarios as detailed in Exeter University's report on target setting (appendix 2). These scenarios are:

Low ambition: Focused on prioritising the most straightforward, low cost and achievable actions and reduction such as behavioural changes.

Medium: Incorporating more extensive strategies to further decarbonise DNPA's operations like transitioning the vehicle fleet to electric.

Maximum: Aiming for the most transformative changes such as involving stakeholders in emission reduction efforts to achieve sustainable procurement.

These scenarios highlight different levels of action and their corresponding emission reduction potentials, providing flexibility based on resource availability and strategic priorities. Rather than committing to a single scenario, the plan will use a blended approach, selecting elements from each scenario to create a tailored strategy that balances ambition with available resources.

3.4 Monitoring and Reporting

Annual reporting will ensure transparency and facilitate responsive adjustments to strategies and actions as needed. The greenhouse gas inventory will be updated annually, and targets will be reviewed every 5 years to align with the latest climate science and SBTi guidelines.

4 Next Steps

4.1 Having established an emissions baseline detailing our largest emissions sources and targets, we will develop a costing plan that prioritises high-priority measures to achieve near-term reductions. Initial efforts will focus on emissions from procurement (322 tCO₂e) and commuting (114 tCO₂e). The plan's objectives and

actions will be communicated to all staff to ensure alignment and collective action. This will involve active staff engagement including training sessions and regular updates to enable staff to contribute to emissions reduction goals.

5 Financial Implications

- 5.1 Implementing the climate action plan will require investment to achieve emissions reduction. The detailed costing plan will outline the expenditure required for each action required to reach the targets. However, the long-term nature of the action plan means that costs are subject to change depending on funding availability and the level of ambition pursued. Funding sources will be explored to support these initiatives.
- 5.2 Additionally, there is a cost associated with the commissioning of Exeter University to undertake the baseline report and target setting work. This consultancy work cost approximately £13,600. The initial investment has provided valuable insights and guidance for the updated plan. If the decision is made to commission the University to conduct an annual carbon footprint, the ongoing costs will need to be factored into future budgets. These reoccurring costs will depend on the scope of the carbon footprint assessments and the level of analysis required each year. Not only will these assessments help track and reduce our carbon footprint, but they will also provide valuable data that can improve our internal processes and contribute to our goal of reaching net zero emissions.
- 5.3 Our climate ambitions will need to be considered against future funding levels. At present we do not know what we will receive in National Park Grant for 2025/26 and beyond. This financial uncertainty makes action planning very different as we do not know what we will be able to afford.

6 Conclusion

- 6.1 The University of Exeter has provided DNPA with a comprehensive emissions baseline, science-based targets, and a clear pathway to net-zero emissions. This work ensures that DNPA's climate action plan is aligned with the Science Based Target initiative and ensures that targets are robust and contribute meaningfully to both national and global climate goals.
- 6.2 The proposed targets clarify our ambition. The next phase is to develop a costed action plan to deliver against the proposed targets. This action plan will be brought to a future Authority meeting for approval. We hope that this may not be the case but it may be that we need to re-consider our targets if we are unable to fund the required actions to meet these targets.

JEN MANNING and HONEY GREEN

Background Papers Climate Emergency Declaration 2019 (NPA/19/020)
Dartmoor National Park Authority Climate Action Plan –
Progress Update 2023 (NPA/23/020)

Attachments Appendix 1 - DNPA Carbon Footprint 2023/24 v1.3
Appendix 2 - DNPA GHG Target 2023/24 v1.3

2027 02 07 JM/HG Climate Action Plan

Dartmoor National Park Authority 2023/24 Carbon Footprint

CENTRE FOR ENERGY AND THE ENVIRONMENT

Contract Document 341

December 2024



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Management Summary

Dartmoor National Park Authority (DNPA) has produced an organisational greenhouse gas inventory (or 'carbon footprint') since 2018/19. DNPA commissioned the Centre for Energy and the Environment (CEE) at the University of Exeter to produce a carbon footprint for the 2023/24 period. The Greenhouse Gas Protocol and EN 14064-1 were used to define the scope of the assessment, which was wider than in previous years and so the results from 2023/24 are not directly comparable to those years. In addition to the GHG Protocol scopes and categories, emissions were also reported under new category headings (buildings, transport, purchased goods and services, investments, and land use). Sources (and sinks) of GHG emissions were calculated based on combining activity data with corresponding emission factors.

DNPA's total net emissions in 2023/24 were 3,096 tCO₂e. The footprint is dominated by the sink observed in Scope 1 from sequestered carbon in woodlands, and the impact of the pension within Scope 3. The following observations are made within each category:

- Buildings: This is a relatively minor category, though one that DNPA has greater direct control over. About three-quarters of emissions here are from offices (i.e. Parke), and visitor centres (mainly Princetown Duchy Hotel). The residual emissions are from staff working at home, and other buildings
- Transport: This is also a relatively minor category, though emissions here are about double those from buildings. About 60% of emissions are from staff commuting with a little over a third from DNPA's own vehicles. Emissions from the grey fleet and business travel are low.
- Purchased Goods and Services: Emissions from this category are 322 tCO₂e and are a significant additional source of emissions compared to previous footprints undertaken by DNPA. Emissions are from a mix of recurring revenue activities, and some fixed term projects. The top category of emissions was associated with visitor management and facilities, at 9% of all purchased goods and services. The method used to calculate these emissions was very high level with a large potential for error.
- Investments: Emissions from the pension were 4,259 tCO₂e for the period. Considering only GHG sources (i.e. not sequestration from land use), this would represent 88% of the entire footprint. DNPA has little to no direct influence on the management of the Devon Pension Fund.
- Land Use: DNPA's woodlands offset a significant amount of GHG due to annual sequestration, representing 36% of all GHG sources. It was not possible to determine the extent to which open habitat sites are a source or sink of GHG emissions.

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1 Introduction

Dartmoor National Park Authority (DNPA) was created by the Environment Act 1995 to conserve and enhance Dartmoor National Park's natural beauty, wildlife and cultural heritage, and to promote opportunities for the public to understand and enjoy the special qualities of Dartmoor National Park. It is headquartered at Parke and has approximately 90 staff.

DNPA has produced an organisational greenhouse gas inventory (or 'carbon footprint') since 2018/19. DNPA commissioned the Centre for Energy and the Environment (CEE) at the University of Exeter to produce a carbon footprint for the 2023/24 period. This included a review of the overall scope of the footprint, and so whilst some parts of the footprint remained the same as in previous years, the revised scope means the output is not directly comparable with the footprints of previous years, and 2023/24 can be taken as a new 'baseline'.

2 Referenced Standards

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

3 General Approach

3.1 Definition of "Carbon Footprint"

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

GHGs that contribute to anthropogenic climate change include carbon dioxide, methane, nitrous oxide, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs) and sulphur hexafluoride (SF6). These each have a different contributory impact to climate change for the same fixed mass. The total impact of all GHGs resulting from the activities of an organisation is measured by multiplying the mass of each gas emitted by its Global Warming Potential (GWP) to an equivalent mass of carbon dioxide termed "carbon dioxide equivalent" (measured in tCO₂e). Typically, GHG emission factors will already be based on carbon dioxide equivalents and so no additional calculations will be necessary.

3.2 Guiding Principles

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

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

3.3 Organisational Boundaries

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

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

- Control: The organisation accounts for all emissions over which it has either financial or operational control.
- Equity: The organisation accounts for its proportion of GHG emissions from respective facilities. This is more likely to be relevant for joint ventures (JVs) though in discussion with DNPA this was deemed to be not applicable.

The control approach is likely to be the most relevant approach here (the equity share approach is stated as being particularly useful for multinational companies with operations in a number of different jurisdictions). Under the control approach 100% of GHG emissions are accounted for operations over which it has control. Emissions from operations where the organisation owns an interest but has no control are not included. Control is defined in one of two ways, and a choice must be made between them:

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

An **operational control boundary** has been applied here. It is stated in the GHG Protocol that in most cases, whether an operation is controlled by the company or not does not vary based on whether the financial control or operational control criterion is used (though the oil and gas sector is a notable exception). In practice here, using either approach is likely to result in the same total emissions within the inventory. There may however be some differences in categorisation. For example, Annex F of the GHG Protocol outlines in detail how to account for emissions from leased assets. This will mean that for assets leased to DNPA (e.g. buildings) these will be classified as Scope 1 and 2 emissions, which would be consistent with how this has been reported in previous footprints.

3.4 Reporting Boundaries

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

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

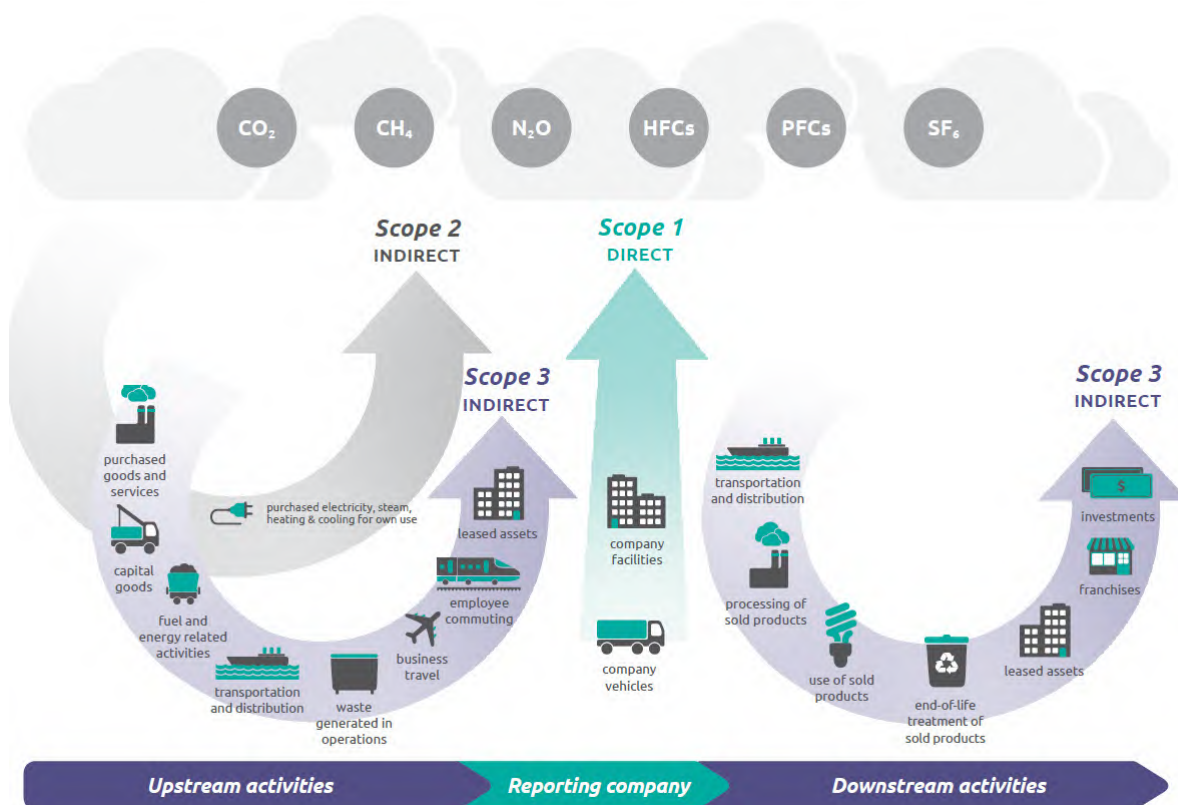


Figure 1: The relationship of direct and indirect emissions [Source: GHG Protocol]

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

3.5 Inventory Categories

Categories within each of the three scopes are provided by ISO 14064 and the GHG Protocol and their secondary documents respectively. These two standards were cross-referenced and in general they align, with some minor differences. A list of categories and whether they have been scoped in and out is shown in Table 1. Specific explanation of what is included within each of these together with data collection and calculation approaches is provided in Section 4.

Table 1: Inventory categories and their recommended inclusion or not within the footprints for DNPA

Scope	Upstream/ Downstream	No.	Category ISO 14064-1	Include/ Exclude
Scope 1: Direct GHG emissions and removals				
1	Direct	1	Direct emissions from stationary combustion	Include
		2	Direct emissions from mobile combustion	Include
		3	Direct process related emissions	Exclude – Not Relevant
		4	Direct fugitive emissions	Include
		5	Direct emissions and removals from Land Use, Land Use Change and Forestry (LULUCF)	Include
Scope 2: Energy GHG indirect emissions				
2	Upstream	6	Indirect emissions from imported electricity consumed	Include
		7	Indirect emissions from consumed energy imported through a physical network	Exclude – Not Relevant
Scope 3: Other indirect GHG emissions				
3	Upstream	8	Energy-related activities not included in direct emissions and energy indirect emissions	Include
		9	Purchased goods and services	Include
		10	Capital equipment	Include
		11	Waste generated from organisational activities	Exclude
		12	Upstream transport and distribution	Exclude
		13	Business travel	Include
		14	Upstream leased assets	Exclude – Not Relevant
		15	Investments	Include
	Downstream	16	Client and visitor transport	Exclude
		17	Downstream transport and distribution	Exclude – Not Relevant
		18	Use stage of the product	Exclude – Not Relevant
		19	End of life of the product	Exclude – Not Relevant
		20	Downstream franchises	Exclude – Not Relevant
		21	Downstream leased assets	Exclude – Not Relevant
	Varies	22	Employee commuting	Include
23		Other indirect emissions not included in the other 22 categories	Exclude – Not Relevant	

Most of the categories excluded in Table 1 were because they were not relevant to DNPA. The following exceptions and their reason for exclusion were:

- Capital equipment: This was aggregated within the previous section on purchased goods and services as it was not able to separate capital from revenue spend.
- Waste generated from organisational activities: No specific waste data was available (e.g. mass of waste for each waste stream and processing method) so this was instead captured via spend on purchased goods and services.
- Upstream transport and distribution: Whilst the supply of goods and services to DNPA will result in emissions from upstream transport and distribution, the magnitude of the emissions are likely to be low, and obtaining meaningful information would be extremely challenging and expensive.
- Client and visitor transport: Emissions from clients and visitors to DNPA specifically are likely to be low, and gathering meaningful information would be challenging. Emissions from visitors to Dartmoor National Park will be significant. However, as all UK national parks are part of Race to Zero¹ which looks looking at overall carbon reduction plans for the national parks, emissions from visitors to Dartmoor were excluded from this organisational footprint.

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

1. Buildings
 - 1.1 Visitor Centres
 - 1.2 Offices
 - 1.3 Other
 - 1.4 Home Working
2. Transport
 - 2.1 DNPA Operated Vehicles
 - 2.2 Business Travel
 - 2.3 Grey Fleet
 - 2.4 Staff Commuting
3. Purchased Goods and Services
 - 3.1 Purchased Goods and Services
4. Investments
 - 4.1 Pensions
5. Land Use
 - 5.1 Woodland
 - 5.2 Open Habitat Sites

¹ <https://www.nationalparks.uk/race-to-zero/>

3.6 Reporting Periods

The carbon footprint was undertaken for the financial year i.e., April 2023 to March 2024. As this is the first year a revised scope for the footprint was considered, it was taken to be the new baseline footprint.

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

1. If data is available for part of the period, then it was used to provide an average value for that period of time and then multiplied up to estimate the total for a year.
2. If partial data is not available, then data from the previous year's footprint was used.
3. If no data from previous years are available, then estimates should be made using secondary sources of data e.g., benchmark data in the case of building energy consumption.

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

3.7 Quantifying Emissions and Removals

Calculation methodologies were selected to minimise uncertainty and yield accurate, consistent, and reproducible results (being mindful of technical feasibility and cost of data gathering). Within each category, sources and sinks were identified. As it is not practicable to directly measure the actual mass of GHGs emitted from an activity, the calculation will take the form of multiplying some input activity data with an emission factor.

The choice of activity data will depend on what is available, but in principle a data hierarchy approach was taken that prioritises primary data (i.e., that collected by the organisation) and site-specific data over secondary data and other estimates. For example, for emissions from vehicles, it would be preferable to use the actual amount of fuel used to the amount spent on fuel, which in turn would be more accurate than knowing the distance travelled. Where a mix of data is available within a category then the hierarchy approach should still be followed. For example, if fuel consumption data exists for some vehicles and mileage data exists for all vehicles, then the fuel consumption data should be used for those vehicles, and the mileage data for the remainder. In addition, steps should be put in place to capture fuel consumption data for all vehicles for the following year's inventory.

Emission factors may come from a range of sources, however the most extensively used will be the UK GHG Conversion Factors for Company Reporting [8] (referred to from here as the "Government EFs"). These provide consistent emission factors to be used for a range of activities and are updated annually. For this 2023/24 footprint, the 2023 Government EFs were used as the majority of the financial year falls in the 2023 calendar year.

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

3.8 Intensity Ratios

The headline inventory was reported in absolute terms as tCO₂e. The nature of DNPA does not lend itself well to normalising by other intensity ratios, for example by number of employees, operating budget, size of estate etc.

3.9 Target Setting

DNPA is in the process of reviewing its targets with a view to aligning with the Science Based Targets Initiative (SBTi).

4 Data Collection and Analytical Approach by Category

4.1 Scope 1: Direct Emissions

4.1.1 Direct emissions from stationary combustion

Description

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

Approach Taken for Footprint

Aggregated annual fuel consumption data was available for Parke (86,732 kWh of gas and 1,397 litres of heating oil), and Princetown Duchy Hotel (195 tonnes of wood chip). These were multiplied by the corresponding government EFs.

This data is already sufficiently accurate to produce a reliable estimate of GHG emissions, though more insight could be available if energy use was available at greater granularity, for example for Parke half-hourly.

4.1.2 Direct emissions from mobile combustion

Description

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

Approach Taken for Footprint

The total volume of diesel and petrol used in DNPA's own vehicles was available for each quarter for both diesel and petrol. These totalled 21,371 litres for diesel and 441 litres for petrol for the year. A small amount of electricity for electric vehicles was also stated, though it was assumed this was also included in the building electricity consumption and so was not included to prevent double counting. In addition, the volume of petrol used in tools was also available. These were multiplied by the government EFs. In addition, there was 100 litres of petrol from the fuel data in section 4.1.1 which was assumed to be used for ranger tools and reported in this section. The fleet for 2023/24 comprised 25 diesel vehicles with associated mileage for that year. For onward analysis (projected emissions), the 21,371 litres were apportioned to each vehicle based on its proportion of the total mileage for the fleet (152,394 miles).

Whilst total fuel consumption is sufficiently accurate to produce a reliable estimate of GHG emissions, the accuracy of individual vehicle GHG emissions could be improved by directly measuring fuel used by each vehicle as well as mileage. Combining the two could be used to establish efficiency metrics (i.e. kgCO₂e/mile).

4.1.3 Direct process related emissions

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

4.1.4 Direct fugitive emissions

Description

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

Approach Taken for Footprint

Estates confirmed there was no leakage of refrigerant in the reporting year.

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

Description

GHG emissions and removals from LULUCF may come from anthropogenic land use activities (controlled biomass burning, restoration of wetlands, forest management, rice and other agriculture cultivation, animal husbandry generating enteric fermentation,) direct land use change (afforestation, reforestation, and deforestation), and managed forests, within the organisational boundary. For DNPA this means the flux of GHG emissions from its woodlands and open habitats.

Approach Taken for Footprint

A report produced by Farm Carbon Toolkit in 2023 identified the baseline annual sequestration in DNPA's woodland estate, using the Forestry Commission's Woodland Carbon Code methodology. These numbers were taken directly from Table 1 of the Farm Carbon Toolkit report. They were unable to determine carbon sequestration from the open habitat sites due to a lack of soil sample replication for soil and habitat combinations.

The values used here can be used in future years, though there would be an implicit assumption that woodland areas remain constant. To improve data accuracy going forward would require commissioning further work to understand the level of carbon sequestration from woodland both in terms of quantity of woodland, and its age and condition. Efforts should also be taken to quantify carbon sequestration from open habitats, even if initially these may be high-level estimates with high margins of error.

4.2 Scope 2: Energy Indirect Emissions

4.2.1 Indirect emissions from imported electricity consumed

Description

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

Approach Taken for Footprint

Electricity consumption data (kWh) was available for the reporting period for all buildings occupied by DNPA. In 2023/24 this comprised 12 sites which totalled 148,903 kWh. These were multiplied by the government EFs for grid electricity (generation). The quality of the source data is already sufficient to be able to calculate GHG emissions.

4.2.2 Indirect emissions from consumed energy imported through a physical network

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

4.3 Scope 3: Other Indirect Emissions

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

Description

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

Approach Taken for Footprint

These were calculated by establishing these emissions in parallel to the main emission source, as described above. These were applied to direct emissions from stationary and mobile consumption, imported electricity, business travel, and commuting. For each of these, the source 'activity data' was in addition multiplied by the corresponding WTT factor as the main EF used. For electricity, the factor used was the sum of three upstream factors – the generation WTT, transmission and distribution (T&D), and T&D WTT.

4.3.2 Purchased products and services

Description

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

Approach Taken for Footprint

DNPA purchase goods and services via a central procurement service (most spend), and additionally from Government Purchase Cards (GPC). This data was analysed using a 'spend based method'.

The central procurement data was analysed first. Each transaction was allocated to an expense area and expense type based on the stated 'activity code' and 'expense code'. In 2023/24 there were 38 expense types and 120 expense types. The expense type was found to be most useful in terms of relating to a sector in the UK economy whereby emission factors are available for each sector (there are 110 high level codes using the Standard Industry Classification [SIC] classification system). Each of the expense types was allocated to one of the SIC codes, or alternatively as either 'included elsewhere'

(e.g., in the case of vehicle fuel), or ‘not relevant’ (where these spend items were not expected to result in emissions). The most recent and applicable emission factors to be used are from the 2021 UK’s carbon footprint dataset [9] in the ‘SIC multipliers’ sheet. These were adjusted by inflation (CPI) to convert the factors from 2021 to 2023 (2023 index 130.5, 2021 index 111.6 compared to a 2015 index of 100, so to account for inflation multiply 2021 EFs by $111.6/130.5$ i.e. 0.86), and spend in each category multiplied by the corresponding EF to obtain GHG emissions.

The GPC dataset only included a description of the purchase and the merchant name, and so it was not possible to easily assign a sector to each spend item as with the centrally procured spend. Instead, a weighted emission factor (0.184 kgCO₂/£ spent for 2023/24) was calculated from the centrally procured spend and applied to each line of spend from the GPC data.

Whilst this method is effective at being able to relatively quickly calculate emissions arising from anywhere in the economy, it is important to recognise it is not likely to be accurate and cannot distinguish emissions between spend within a category or between suppliers, and is only really useful as an initial rough ‘snapshot’ rather than as a tool that can identify specific opportunities or track changes over time (as the only two factors in the calculation are amount spent and the emission factor). To improve data quality in future years, steps should be taken to engage with suppliers to obtain more relevant and specific EFs. Suppliers should be ranked by spend and those with the highest spend targeted first. If specific data is obtained for a supplier then this can be used to replace the spend-based EF used in the current approach, with that approach persisting where specific supplier data is not available.

4.3.3 Capital equipment

Description

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

Approach Taken for Footprint

The source data from the previous section on purchased goods and services did not enable separation of spend on capital and revenue items, and to capital equipment was included within that section, and not separately reported here. If spend data was separated into revenue and capital spend, then these categories could be separately reported here.

4.3.4 Waste generated from organisational activities

Description

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

- The use of recycled materials in the products the organisation purchases. These are already accounted for in the section on purchased products and services.

- The transport and subsequent processing of waste generated by the organisation. This is what is covered within this section. Technically, the transport of waste from the organisation to the waste treatment facility would constitute “upstream transport and distribution”, however as the Government EFs combine the transport and waste processing impact, they are assumed to be included within this section.
- The onward disposal of waste from products sold by the organisation. This is not applicable to DNPA.

No specific waste data was available (e.g. mass of waste, by waste stream and processing method) so this was instead captured via spend on bought goods and services.

4.3.5 Upstream transport and distribution

Description

This category includes transportation and distribution (both transport and logistics including warehousing) of products purchased by the reporting company in the reporting year between a company’s tier 1 suppliers (i.e., those with which the organisation has a direct purchase order) and its own operations, and transportation and distribution services purchased by the reporting company in the reporting year, including inbound logistics, outbound logistics. The transport within the supply chains between tier 1 and 2 suppliers should be included within the “purchased goods and services” section i.e., that section reports “cradle-to-gate” emissions (where gate is the factory gate of a supplier), and this section should report on the transport of those goods from the factory gate to the organisation.

Whilst the supply of goods and services to DNPA will result in emissions from upstream transport and distribution, the magnitude of the emissions are likely to be low, and obtaining meaningful information would be extremely challenging and expensive and so this was not reported here.

4.3.6 Business travel

Description

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

Approach Taken for Footprint

Mileage data from the grey fleet was available on a quarterly basis. Annually this resulted in 26,125 miles. This was multiplied by the emission factor for ‘an average car with an unknown fuel’.

Distance travelled for three modes of public transport. There were 6,036 km by plane which was multiplied by the emission factor for an economy short haul flight inclusive of radiative forcing. There were 3,685 km by train which was multiplied by the national rail emission factor. There were 702 km travelled by bus which was multiplied by the local bus emission factor. There were 64 nights spend in hotels which were multiplied by UK hotel nightly room emission factor.

The data is generally sufficient to calculate annual GHG emissions. It could be improved by establishing vehicle type (e.g. vehicle fuel petrol/diesel/electric) to provide a more accurate result. This will become more important as electric vehicles become increasingly commonplace.

4.3.7 Upstream leased assets

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

4.3.8 Investments

Description

Indirect emissions from investments are emissions due to operation of equity investments. An equity investment refers to the holding of shares of stock on a stock market in anticipation of income from dividends and capital gains, as the value of the stock rises. It may also refer to the acquisition of equity (ownership) participation in a private (unlisted) company or a start-up company. For DNPA, this has been taken to be the pension scheme of its staff.

Approach Taken for Footprint

DNPA contribute to the Devon Pension Fund which is part of the Brunel Pension Partnership. The fund regularly published its Weighted Average Carbon Intensity (WACI) which in 2023 was 150 tCO₂/£million. The value of DNPA's investment was £28.39 million, which was multiplied by the WACI to obtain the annual emissions from pension holdings.

This approach is high level, though reasonable for the production of the footprint for DNPA.

4.3.9 Client and visitor transport

Emissions from clients and visitors to DNPA specifically are likely to be low, and gathering meaningful information would be challenging. Emissions from visitors to Dartmoor National Park will be significant. However, as all UK national parks are part of Race to Zero which looks looking at overall carbon reduction plans for the national parks, emissions from visitors to Dartmoor were excluded from this organisational footprint.

4.3.10 Downstream transport and distribution

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

4.3.11 Use stage of the product

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

4.3.12 End of life of the product

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

4.3.13 Employee commuting

Description

This includes transport of employees between their homes and workplaces. In the case of DNPA this would cover transport from the home to the office, with any transport during working hours captured within other sections. This can cover a range of modes but in practice will be mainly driving (either single driver or car sharing) as well as potentially public transport modes and walking/cycling. Also included in this section is 'home working' i.e., emissions arising from energy used to heat homes and operate work equipment whilst staff are home working.

Approach Taken for Footprint

A staff travel survey was undertaken, with the latest results from 2022. This asked staff about their work patterns including numbers of days at home and in the office, their commuting distances, and their modes of travel. A total of 63 responses were gathered. The results were analysed as follows:

- There were nine modes of transport selected by applicants from the survey (small/medium petrol car, small/medium/large diesel car, hybrid vehicle, bicycle, electric bicycle, foot).

- For each survey response the weekly miles by each selected mode (up to three types) were calculated by multiplying the user entered return distance travelled by the user entered number of times a week the journey was made.
- Manual adjustments were made to account for lift sharing with the assumption that a lift share had two occupants to a vehicle. For example, where an applicant chose car as a single mode of transport and that it was a car share, the resulting distance travelled was halved.
- The total number of days worked by each survey respondent was calculated by summing the user entered number of weekly days worked at home with number of days commuted by each mode.
- The total miles per week for each mode were then calculated by summing all the weekly miles each respondent entered for each mode.
- The effective full time equivalent (FTE) responding to the survey was established by dividing the total number of days worked a week (276) by the number of assumed days a week for an FTE (5) resulting in 55.2 FTE. Given there were 63 responses, this is equivalent to an average of 0.88 FTE per respondent.
- The total mileage for each mode was divided by the 55.2 FTE to return weekly miles/FTE for each mode. This was multiplied by an assumed 47 weeks a year to return miles/FTE per year for each mode.
- The number of FTE in the organisation in 2023/24 (80.89 FTE) was multiplied by the miles/FTE for each mode to establish total organisational miles by mode, which could then be multiplied by the corresponding Government EF.
- The number of annual home working hours per FTE was calculated by counting the total number of stated days worked from home in the survey (80.5), establishing the fraction of total equivalent FTE weekdays worked from home (0.29) by dividing by the total number of days worked by survey respondents (276). Based on a 5-day working week and a fraction of 0.29 work from home, this results in an equivalent of 1.46 days/week which for 8 hours a day and 47 weeks is 548.3 hours/FTE. This was multiplied by the number of FTE and the corresponding Government EF for homeworking (heating and power).

The format of the survey is sufficient to enable appropriate analysis for future years. It should be rerun annually, and it should be ensured that there are allowable modal inputs to enable respondents to select electric vehicles (it was unclear if this was allowable in 2023/24, though if it was then no respondent did select it).

4.3.14 Other indirect emissions not included elsewhere

No other sources of emissions have been identified.

5 Results

DNPA's total net emissions in 2023/24 were 3,096 tCO_{2e}. The footprint is dominated by the sink observed in Scope 1 from sequestered carbon in woodlands, and the impact of the pension within Scope 3, as can be seen in Figure 2. A full breakdown of emissions within GHG Protocol/EN 14064-1 categories is shown in Appendix A.

Emissions broken down by theme are shown in Table 2, Figure 3, and Appendix B. The following observations are made within each category:

- Buildings: This is a relatively minor category, though one that DNPA has greater direct control over. About three-quarters of emissions here are from offices (i.e. Parke), and visitor centres

(mainly Princetown Duchy Hotel). The residual emissions are from staff working at home, and other buildings

- Transport: This is also a relatively minor category, though emissions here are about double those from buildings. About 60% of emissions are from staff commuting with a little over a third from DNPA’s own vehicles. Emissions from the grey fleet and business travel are low.
- Purchased Goods and Services: Emissions from this category are 322 tCO₂e and are a significant additional source of emissions compared to previous footprints undertaken by DNPA. Emissions are from a mix of recurring revenue activities, and some fixed term projects. The top category of emissions was associated with visitor management and facilities, at 9% of all purchased goods and services. The method used to calculate these emissions was very high level with a large potential for error.
- Investments: Emissions from the pension were 4,259 tCO₂e for the period. Considering only GHG sources (i.e. not sequestration from land use), this would represent 88% of the entire footprint. DNPA has little to no direct influence on the management of the Devon Pension Fund.
- Land Use: DNPA’s woodlands offset a significant amount of GHG due to annual sequestration, representing 36% of all GHG sources. It was not possible to determine the extent to which open habitat sites are a source or sink of GHG emissions.



Figure 2: GHG emissions in 2023/24 by GHG Protocol Scope

Table 2: GHG emissions in 2023/24 by theme and sub-category and GHG Protocol Scope

Theme Category	Scope 1	Scope 2	Scope 3	Grand Total
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1. Buildings	27	31	34	92
1.1 Visitor Centres	8	15	11	33
1.2 Offices	19	11	7	37
1.3 Other		6	2	7
1.4 Home Working			15	15
2. Transport	55		140	193
2.1 DNPA Operated Vehicles	55		13	68
2.2 Business Travel			2	2
2.3 Grey Fleet			9	9
2.4 Staff Commuting			114	114
3. Purchased Goods and Services			322	322
3.1 Purchased Goods and Services			322	322
4. Investments			4259	4259
4.1 Pensions			4259	4259
5. Land Use	-1771			-1771
5.1 Woodland	-1771			-1771
Grand Total	-1689	31	4755	3096

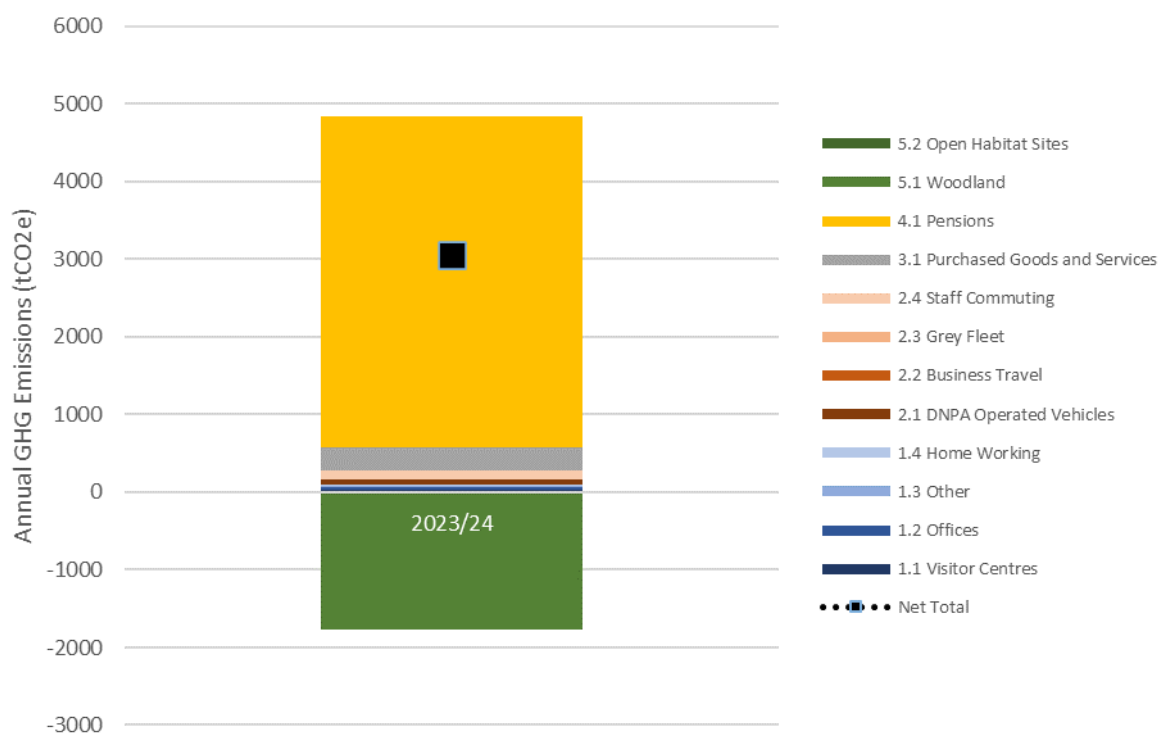


Figure 3: GHG emissions in 2023/24 by theme sub-category

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- [9] UK Government, UK and England’s carbon footprint to 2019, (n.d.). <https://www.gov.uk/government/statistics/uks-carbon-footprint>.

Appendix A: Inventory Broken Down by Scope and Category

Scope	No	Name	tCO ₂ e 2023/24	tCO ₂ e 2023/24
1	1	Direct emissions from stationary combustion	-1689	27
	2	Direct emissions from mobile combustion		55
	3	Direct process related emissions		X
	4	Direct fugitive emissions		0
	5	Direct emissions and removals from Land Use, Land Use Change and Forestry (LULUCF)		-1771
2	6	Indirect emissions from imported electricity consumed	31	31
	7	Indirect emissions from consumed energy imported through a physical network		X
3	8	Energy-related activities not included in direct emissions and energy indirect emissions	4755	58
	9	Purchased products		322
	10	Capital equipment		X
	11	Waste generated from organisational activities		X
	12	Upstream transport and distribution		X
	13	Business travel		10
	14	Upstream leased assets		X
	15	Investments		4259
	16	Client and visitor transport		X

	17	Downstream transport and distribution		X
	18	Use stage of the product		X
	19	End of life of the product		X
	20	Downstream franchises		X
	21	Downstream leased assets		X
	22	Employee commuting		105
	23	Other indirect emissions not included in the other 22 categories		X
Offset	24	Offset Carbon		0
		GRAND TOTAL (net)		3096

Appendix B: Inventory Broken Down by Theme and Detail

Category and Detail	2023/24
1. Buildings	92
1.1 Visitor Centres	33
Princetown Duchy Hotel	24
Postbridge	5
Haytor	4
1.2 Offices	37
Parke	33
Heating Oil	4
1.3 Other	7
Works Depot	3
Newbridge Aerial	0
Meldon	1
Ranger Store	0
Dartmeet	2
Higher Uppacott	1
Uppacott	1
1.4 Home Working	15
Home Working	15
2. Transport	194
2.1 DNPA Operated Vehicles	68
Diesel	67
Petrol	1
Rangers Tools	0
2.2 Business Travel	2
Hotel Stays	1
Plane	1
Train	0
Bus	0
2.3 Grey Fleet	9
Grey Fleet	9
Volunteer Mileage	2
2.4 Staff Commuting	114
Small petrol car (up to 1.4 litre)	25
Medium diesel car (1.4-2.0 litre)	35
Hybrid vehicle	0
Small diesel car (up to 1.4 litre)	17
Medium petrol car (1.4-2.0 litre)	25
Average Car Unknown Fuel	2
Foot	0
Large diesel car (over 2.0 litre)	10
Electric bicycle	0
Bicycle	0
3. Purchased Goods and Services	289
3.1 Purchased Goods and Services	322

Visitor Management And Facilities	28
Ranger Team Vehicles	20
Legal Services	17
Biodiversity	15
Office Accommodation - Princetown	14
Environmental Land Management Scheme	11
Public Rights Of Way	12
Central Services	19
Development Control	11
Ranger Service	18
Hill Farm Project (Pcf)	13
Human Resources	11
Information Technology	10
Visitor Centre Retail	17
Visitor Centres General	5
Central Core	13
Communications Service	10
Dartmoor Headwaters	7
Office Accommodation - Parke	7
All Other Central Procurement	31
Dynamic Dartmoor	13
Archaeology	6
Government Purchase Card Spend	13
Water Consumption	0
4. Investments	4259
4.1 Pensions	4259
Pension investments	4259
5. Land Use	-1771
5.1 Woodland	-1771
Blackingstone Rock	-7
Caseley Wood	-37
Castor Copse	-37
Eastpark Copse	-52
Hawnes & Dendles	-122
Haytor	-186
Holne Moor & White Woods	-925
Plasterdown	-6
Sanduck & Huntingpark	-115
Trendlebere	-6
Whiddon Scrubs	-45
Wray Cleave & Steward Woods	-234
Grand Total	3096

Setting a Greenhouse Gas Emissions Target for Dartmoor National Park Authority

CENTRE FOR ENERGY AND THE ENVIRONMENT

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Management Summary

Dartmoor National Park Authority (DNPA) commissioned the CEE to undertake a review of potential options for a GHG target for the authority. It was shown that the existing target of achieving carbon neutrality for scope 1 and 2 emissions by 2025 has outlived its usefulness as it would already be met if GHG removals were included and could not be met otherwise. Perversely, under the existing target and reporting boundaries, DNPA could significantly *increase* its emissions and still be 'net-zero'.

Science-based targets developed by the SBTi were applied to DNPA's GHG Inventory. Whilst these standards can only formally be adopted by corporations, it is encouraged that any organisation consider the underlying methods and targets. Following this, the following is recommended regarding setting a near-term target for DNPA:

- Woodlands/Land Use: FLAG emissions for DNPA are negative, namely there is a net removal of GHGs due to woodland owned by DNPA. These cannot be used to offset emissions from the remainder of DNPA's footprint. It is recommended that DNPA restate their commitment that no deforestation take place and that measures are put in place to protect and enhance uptake of GHGs from the atmosphere here. In addition, further efforts should be made to better understand the flux of emissions from non-woodland land owned by DNPA.
- Pensions: Emissions from pensions dominate the footprint. As reporting of pensions is optional within the GHG Protocol, that the projected emissions from pensions are similar to a required target set using SBTi, and that DNPA has effectively no influence on decisions made by the pension fund, it is recommended that pensions are not explicitly included within a target. However, there would still be value in separately reporting the annual performance.
- Remaining emissions: In 2023/24 GHG emissions excluding the woodlands and the pension were 609 tCO₂e. This comprises Scope 1 and 2 emissions (buildings and vehicles) and Scope 3 emissions (energy-related emissions, procurement, business travel, and commuting). It is recommended that three targets are set for 2030/31 as follows:
 - A headline target of 438 tCO₂e for all emissions excluding pensions and woodlands (calculated by reducing Scope 1 & 2 emissions by 42% and Scope 3 emissions by 25%).
 - Secondary targets for Scope 1 & 2 emissions (i.e. excluding woodlands) only of 66 tCO₂e (calculated by reducing Scope 1 & 2 emissions by 42%), and 196 tCO₂e for Scopes 1 to 3 excluding procurement.

In addition, DNPA should commit to a long-term target of achieving net-zero no later than 2050, which must include at least a 90% reduction in emissions so that emissions in 2050/51 are no greater than 61 tCO₂e.

Performance against each of these should be reported annually. To ensure consistency with the most recent climate science and best practices the near-term target must be reviewed, and if necessary, recalculated at a minimum every 5 years i.e. at the point of the 2028/29 footprint. At this point, the 2050 date for the long-term target should also be reviewed with a view to bringing it forward if DNPA can identify clear pathways it could take to achieve this. Additional monitoring targets are provided in the report.

1 Introduction

Dartmoor National Park Authority (DNPA) at present has a target to be ‘carbon neutral’ against its Scope 1 and 2 emissions by 2025. DNPA has produced an organisational greenhouse gas (GHG) inventory (or ‘carbon footprint’) since 2018/19. It recently commissioned the Centre for Energy and the Environment (CEE) at the University of Exeter to produce the carbon footprint for the 2023/24 period¹, including a review of the overall scope of the footprint which has been taken as the new ‘baseline’. DNPA commissioned the CEE to undertake a review of potential options for a GHG target for the authority.

2 Carbon Neutral Scopes 1 and 2 by 2025

The existing target set by DNPA requires carbon neutrality by 2025 for scopes 1 and 2. The dominant source of emissions in the entire footprint are from pensions at 4,259 tCO₂e as can be seen in Figure 1. However, these within Scope 3, and are optional under reporting within the Greenhouse Gas Protocol². In addition, DNPA have no real influence on investment decisions, as this is part of the wider Devon Pension Fund within the Brunel Pension Partnership. The second most significant category is the 1,771 tCO₂e sequestered by woodlands owned by DNPA. This is significantly greater than the remaining 609 tCO₂e emitted from the remaining categories in the footprint, of which 113 tCO₂e are Scopes 1 and 2. Therefore, if pensions are excluded then the original 2030 carbon neutral for scopes 1 and 2 target has already been met and indeed if Scope 3 was included (aside from pensions) it would also be met. Conversely, if the sequestration from the woodlands is excluded, projections of emissions for Scope 1 and 2 show that they will not reduce to zero (as DNPA will continue undertaking activities) therefore the target could not be met. The current net zero for scopes 1 and 2 target by 2025 is no longer providing meaningful incentive for greenhouse gas reduction.

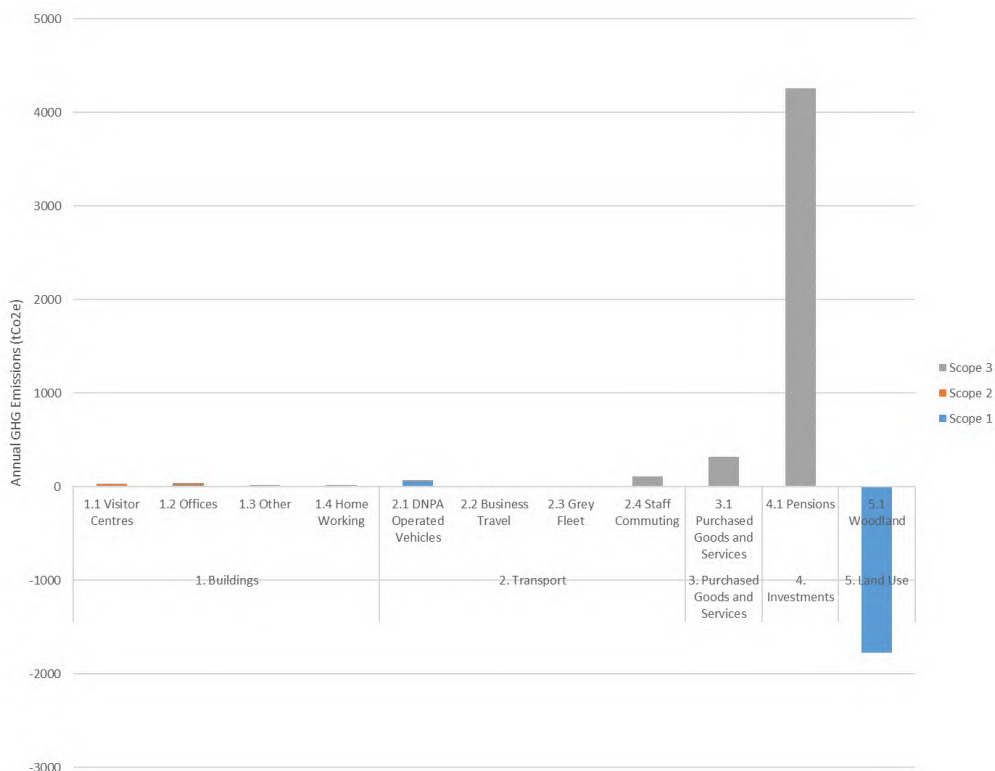


Figure 1: GHG Emissions in 2023/24 by category and scope.

¹ Contract Document 341, Dartmoor National Park Authority 2023/24 Carbon Footprint, D Lash, 2024.

² <https://ghgprotocol.org/>

3 An Introduction to Science Based Targets

The most recognised consistent method for setting GHG reduction targets is to use ‘science-based targets’ (SBT). These provide a clearly-defined pathway for companies to reduce emissions in line with what the latest climate science deems necessary to meet the goals of the Paris Agreement – limiting global warming to 1.5°C above pre-industrial levels. The standards used to set SBTs and validation of those targets is undertaken by the Science Based Targets initiative (SBTi)³.

The SBTi does not currently assess targets for cities, local governments, public sector institutions, educational institutions, or non-profit organisations, which would include DNPA. However, such stakeholders are still encouraged to use the SBT setting methods detailed in the documents and guidance produced by the SBTi, which are stated to in general be updated on an annual basis.

The basis of SBTs is the setting of mitigation targets to align with pathways that meet the goals of the Paris Agreement of at least a 50% chance of limiting warming to 1.5°C above pre-industrial levels. This is stated to result in a remaining global carbon budget of 500 gigatonnes to reach net-zero by 2050. Within this framework SBTi developed an emissions corridor covering GHG emissions reducing emissions by at least 42% by 2030 and 90% by 2050 from 2020 levels; the balance to achieve net-zero is from at least 1 to 4 gigatonnes of GHG removal per year by 2050. It should be stated that GHG removals are not included in SBTs, except in the case of forestry, land, and agriculture (FLAG) sectors.

SBTs are set for the near-term (5 to 10 years from the date of submission), and long-term (2050, or sooner). The targets are established by aligning emissions of the organisation to the allocation of the remaining global emissions budget, as shown in Figure 2.

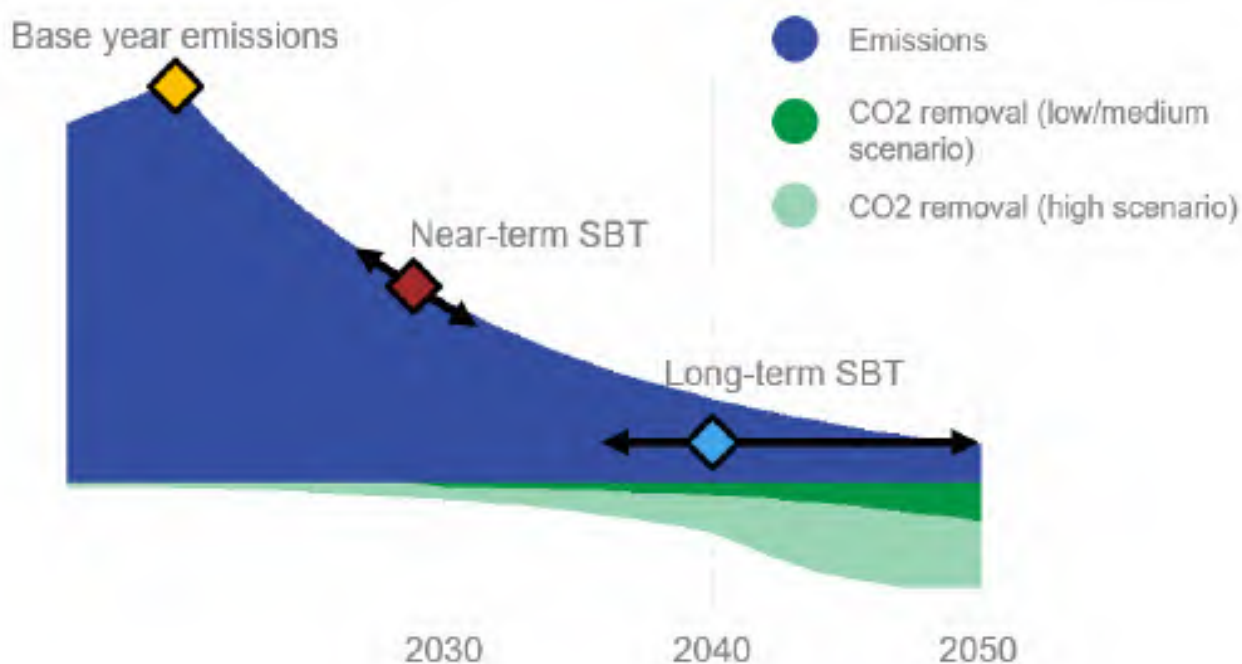


Figure 2: Simplified illustration of how mitigation pathways are used to calculate near-term and long-term SBTs (Source: SBTi)

The annual rates of decarbonisation are based on total aggregated global emissions, and it is not possible (for example, in their provided tools) to override this with regional or country-level decarbonisation pathways. The SBTi state that this is because many companies operate over different

³ <https://sciencebasedtargets.org/>

geographies, and that in their sector method this is accounted for to some extent. However, they also acknowledge that these assumptions may be insufficient and that they are exploring regional or county-level differentiation options. For DNPA, it is likely that at least for Scope 1 and 2 emissions decarbonisation should occur at a faster rate than a global average. SBTi also state that the derived targets should be viewed as the minimum acceptable level of decarbonisation.

Targets are set for both Scopes 1 and 2, and Scope 3 using two main methods:

- Cross-sector absolute reduction: This is also referred to as the Absolute Contraction Approach and sets targets on an absolute basis to align with a 42% reduction between 2020 and 2030 (for the near-term target). For a base year of 2020 this would equate to a 4.2% minimum linear annual rate and for base years later than this the annual percentage reduction would increase as there is a shorter amount of time to achieve the same amount of reduction. For base years prior to 2020, it is stated that the minimum annual reduction should still be 4.2%.
- Sector-specific intensity convergence: This is also referred to as physical intensity convergence or Sectoral Decarbonization Approach (SDA) and is based on the global convergence of emissions intensity by broad sector to align within the overall available GHG budget. Specific sectors in the SBT Setting Tool include power generation, buildings (residential and services), and cement with emissions intensity being specific to each sector. In the case of the buildings sector, intensity is expressed as kgCO₂/m².

It is possible to combine methods for different parts of the organisation’s footprint to obtain an overall target. The two methods may not give the same result, and the SBTi recommend choosing the more onerous of the targets. Setting both near-term and long-term criteria requires addressing mandatory criteria and recommendations from the Corporate Manual, Net-Zero Standard, and sector-specific guidance where it exists. A detailed consideration of the criteria has been undertaken in the next sections with a summary of the headline criteria shown in Figure 3.

			Scope 1 and 2			Scope 3			
Near-term science-based targets	Target boundary		95% coverage of scopes 1 & 2			If scope 3 >40% of total emissions: boundary to cover minimum 67% of scope 3			
	Target year		5-10 years from date of submission (except maritime)			5 - 10 years from date of submission			
	Method eligibility and minimum ambition	Method	Absolute reduction	Sector-specific intensity convergence	Renewable electricity (scope 2 only)	Cross-sector absolute reduction	Sector-specific intensity convergence	Supplier or customer engagement	Scope 3 physical and economic intensity reduction
		Eligibility and min. ambition	<ul style="list-style-type: none"> • Minimum of 4.2% linear annual reduction (LAR) dependant on base year. • Exception: FLAG pathway is 3.03% LAR 	<ul style="list-style-type: none"> • Depends on sector and company inputs 	<ul style="list-style-type: none"> • 80% RE by 2025 • 100% RE by 2030 	<ul style="list-style-type: none"> • 25% LAR 	<ul style="list-style-type: none"> • Depends on sector and company inputs (SDA) 	<ul style="list-style-type: none"> • e.g. 80% of suppliers by emissions by 2025 	<ul style="list-style-type: none"> • 7% year-on-year (both options)
Long-term and net-zero science-based targets	Target boundary		95% coverage of scopes 1 & 2			90% coverage of scope 3			
	Target year		2050 or sooner (2040 for the power sector and maritime)			2050 or sooner			
	Method eligibility and minimum ambition	Method	Absolute reduction	Sector-specific intensity convergence	Renewable electricity (scope 2 only)	Cross-sector absolute reduction	Sector-specific intensity convergence	Supplier or customer engagement	Scope 3 physical and economic intensity reduction
		Eligibility and minimum ambition	<ul style="list-style-type: none"> • 90% reduction (cross-sector pathway) • 72% reduction for FLAG • Other sector pathways vary 	<ul style="list-style-type: none"> • Sector /commodity pathways vary 	<ul style="list-style-type: none"> • 100% RE 	<ul style="list-style-type: none"> • 90% reduction (cross-sector pathway) • 72% reduction for FLAG • Other sector pathways vary 	<ul style="list-style-type: none"> • Sector/ commodity pathways vary 	<ul style="list-style-type: none"> • Methods are not eligible for long-term SBTs 	<ul style="list-style-type: none"> • 97% reduction (both options)
			Not eligible			15°C ambition		Well below 2°C ambition	

Figure 3: Key Criteria for Near and Long Term Science Based Targets [15]

Recent guidance⁴ has been finalised for companies with FLAG emissions including pathways for eleven specific sectors (beef, chicken, timber and wood fibre etc.), as well as a ‘diversified’ pathway. Importantly, FLAG targets cover only emissions from FLAG activity with all other emissions being

⁴ <https://ghgprotocol.org/land-sector-and-removals-guidance>

covered by usual SBT corporate standard. It is stated that FLAG activity cannot be used to offset or net emissions from non-FLAG activity, and that *'biogenic removals may be accounted for only to meet FLAG targets'*. As shown in Figure 4, emissions from energy and industry are covered by the near-term Corporate Standard (i.e. 42% reduction in Scopes 1 and 2 by 2030 and 25% in Scope 3 by 2030), with FLAG emissions reduction targets of 30% by 2030. As DNPA's FLAG emissions are negative (i.e. the woodland is removing rather than releasing emissions), this is therefore not applicable in the case of target-setting as emissions are already negative within the FLAG section, which itself cannot be used to offset emissions from energy and industrial processes. The guidance does state that there should be a commitment in place to ensure no deforestation takes place.

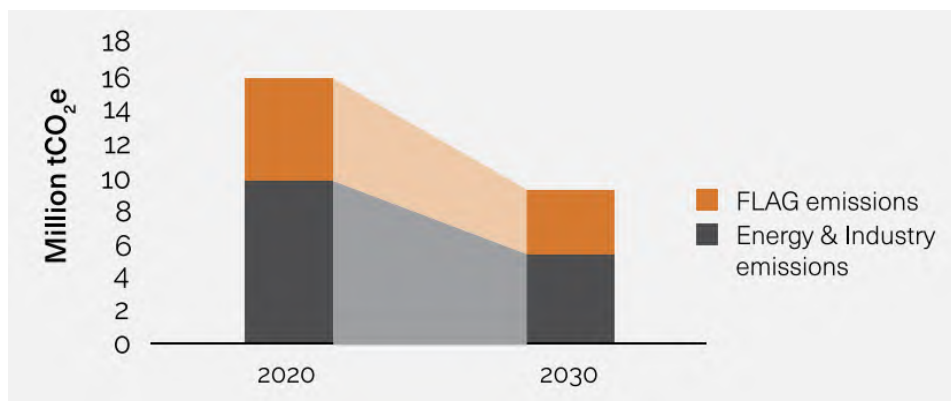


Figure 4: SBTI emissions coverage with FLAG.

4 Near-Term SBT for DNPA

A breakdown of DNPA's 2023/24 footprint is shown in Figure 5 and Figure 6. As discussed in the previous section, removals from the owned woodlands would be outside of the scope of SBT near-term targets. The significance of the pensions compared to the whole footprint can clearly be seen. The pension fund has a stated target of achieving net-zero by 2050. Assuming a linear reduction from 2023/24 to 2050, this results in an approximate 26% reduction in 2030. The required near-term emissions reduction target for Scope 3 emissions in the SBTi Corporate Standard is 25%, which is similar in magnitude. As reporting of pensions is optional within the GHG Protocol, that the projected emissions from pensions are similar to the required target, and that DNPA has effectively no influence on decisions made by the pension fund, it is recommended that pensions are not explicitly included within a target. However, there would still be value in separately reporting the annual performance going forward.

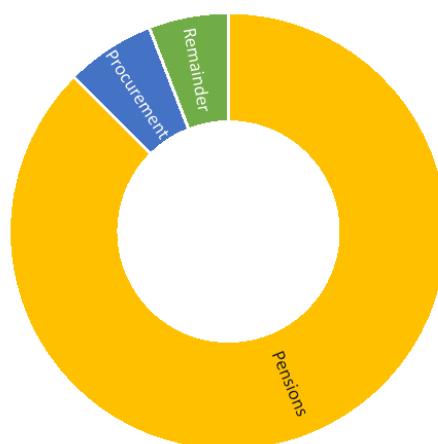


Figure 5: Split of all DNPA emissions 2023/24 (excluding removals from woodlands)

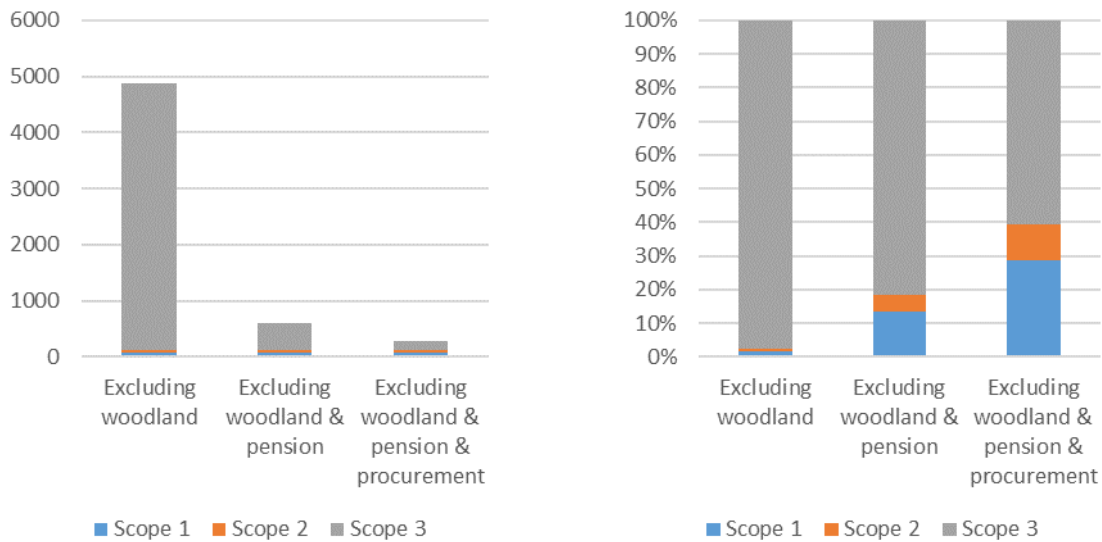


Figure 6: Breakdown of emissions at various levels of inclusion.

With the pension excluded, procurement emissions become the most significant category, being 322 tCO₂e out of 609 tCO₂e (496 tCO₂e of emissions are from Scope 3). The SBT near-term target requires 67% of Scope 3 emissions to be included. Therefore, procurement is too large a category to exclude from the target. The remaining Scope 3 categories are energy-related activities (an ‘overhead’ on Scope 1 and 2 energy and fuel use), grey fleet and business travel (collectively only 12 tCO₂e) and commuting (114 tCO₂e). Commuting emissions could potentially be excluded from a near-term target, however it is recommended that they are included given DNPA does have some influence in this area, especially regarding working patterns. Applying the SBTi’s tools for three coverages of DNPA’s footprint is shown in Figure 7. These are based on a target for the 2030/31 year, with assumed linear interpolation between the 2023/24 baseline and the target year. The SBTi do not state that reduction need to be made linearly, or that there are cumulative budget targets.

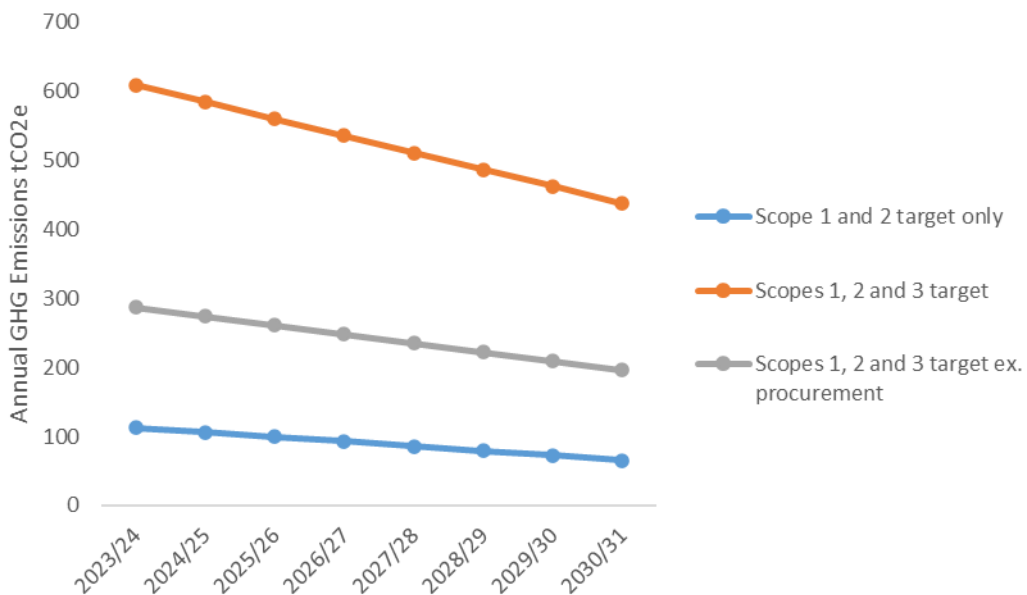


Figure 7: Three potential trajectories for SBT targets considering all emissions aside from pensions and woodlands (orange), excluding procurement (grey), and just Scopes 1 and 2 (blue)

5 Net-Zero (Long-Term) SBT for DNPA

The SBTi also produce guidance for setting long-term targets. These require achieving net-zero by 2050 at the latest and must be achieved by reducing emissions by at least 90% so that for DNPA emissions in 2050/51 are no greater than 61 tCO₂e. The remaining unabated emissions can be ‘neutralised’ as per criterion C28 of the SBTi net-zero standard criteria document which states that “Companies shall remove carbon from the atmosphere and permanently store it to counterbalance the impact of any unabated emissions that remain once companies have achieved their long-term science-based target, and for subsequent years thereafter. The neutralization of unabated emissions applies to both the emissions reduction target boundary and to any unabated emissions that have been excluded from the GHG inventory”. A straight-line trajectory for emissions reduction to 2050 is shown in Figure 8. On this basis, the rate of reduction is slightly lower than the near-term target (i.e. meeting the near-term targets gives confidence that DNPA is on track to meet the net-zero target).

To ensure consistency with the most recent climate science and best practices the near-term target must be reviewed, and if necessary, recalculated at a minimum every 5 years. As these challenges are likely to persist over the short term, it is recommended that a commitment of net-zero by 2050 at the latest is made, with the end date reviewed in 5 years’ time and brought forward if DNPA can identify clear pathways it could take to achieve this.

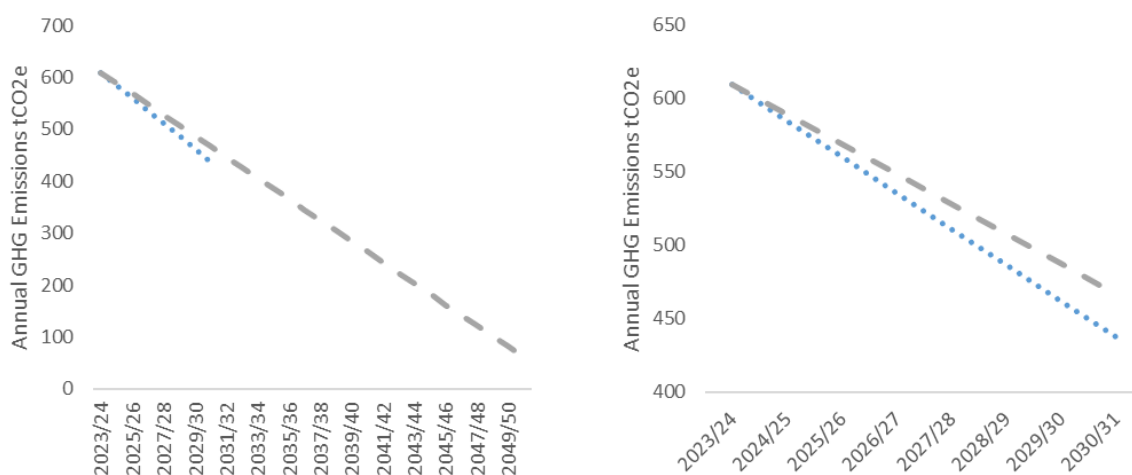


Figure 8: DNPA Scopes 1 to 3 (excluding pensions and woodlands) near-term (blue dotted line) and long-term (grey dashed line) targets to 2050 (left) and zoomed in to 2030/31 (right).

6 Projecting DNPA’s Emissions to 2030/31

An exercise was undertaken to project emissions for DNPA to 2030/31 based on stated initiative in place by the authority (active measures), and wider influencing factors for example the expected reduction in carbon intensity of electricity supply from the national grid (passive measures). This exercise often relied on high-level assumptions where specific information (either locally or nationally) was unavailable. Three project scenarios were developed which were Low, based on measures that DNPA are already broadly committed to, plus two further scenarios – Medium and Maximum – which represent increasing levels of ambition respectively. The assumptions made for each of these three scenarios (with Medium being the same as Low plus additional measures etc.) are shown in Table 1.

Table 1: Assumed measures for each of the three scenarios by category

Category	Low	Medium	Maximum
Buildings	Electricity emission factors fall annually due to expected decarbonisation of supply.	No additional measures.	Improvements to Parke in insulation ⁵ from 2027/28 and solar hot water ⁶ (SHW) from 2030/31. A directly connected photovoltaic array is assumed to supply Parke from 2030/31.
Fleet	The current footprint is based on 26 diesel vehicles in the fleet. The Low scenario assumes in 2024/25 one is sold and not replaced, and a further three are replaced with electric alternatives (EVs). A further replacement with an EV is taken to happen in 2025/26. Fleet in 2030/31 4 EVs out of 25 (16%).	An additional four diesel vehicles are replaced with EVs in 2028/29. Fleet in 2030/31 8 EVs out of 25 (32%).	A further diesel vehicle is replaced with an EV in 2029/30. Fleet in 2030/31 9 EVs out of 25 (36%).
Business Travel	These emissions were only 2 tCO ₂ e in the baseline year and so were kept constant for all three scenarios.	No additional measures.	No additional measures.
Grey Fleet	The emission factor from vehicles was assumed to decrease over time with the assumption that increasingly more DNPA staff would have EVs based on national projections ⁷ .	No additional measures.	No additional measures.
Commuting	Commute patterns remain the same, staff reduce by 4 from 2026/27, increase in EV as per grey fleet. Modest reduction in homeworking emission factors due to assumed general improvements in energy efficiency. Baseline assumption per FTE 3.5 days in office, 1.5 days at home.	Increased flexibility policy from 2026/27 resulting in homeworking increasing on average by one day per week.	Further Increased flexibility policy in 2026/27 resulting in homeworking increasing by another one day per week.
Procurement	Assumes procurement will reduce linearly by approximately 25% in total from 2023/24 to 2030/31 as supply chains decarbonise (assumed to be proportional the Climate Change Committee's projected emissions from buildings ⁸).	Assumes additional decarbonisation equivalent to 30% reduction from 2023/24 to 2030/31 due to increased supplier engagement.	Assumes further decarbonisation equivalent to 40% reduction from 2023/24 to 2030/31 due to increased supplier engagement.

⁵ Space heating assumed to be 80% of gas use, potential savings to space heating taken to be 25%.

⁶ Hot water assumed to be 20% of gas use, potential savings taken to be 50%.

⁷ <https://www.gov.uk/government/publications/tag-data-book>

⁸ <https://www.theccc.org.uk/publication/2023-progress-report-to-parliament/>

The projected emissions for the three scenarios for each year to 2030/31 broken down by category together with the SBTi Scopes 1 to 3 target are shown in Figure 9. This shows that if all Low measures are achieved, that the target would just be missed. Even, this would be very reliant in particular on procurement emissions falling as modelled, and there is a high amount of uncertainty regarding this, as well as underlying difficulty in accurately capturing the impact of spending.

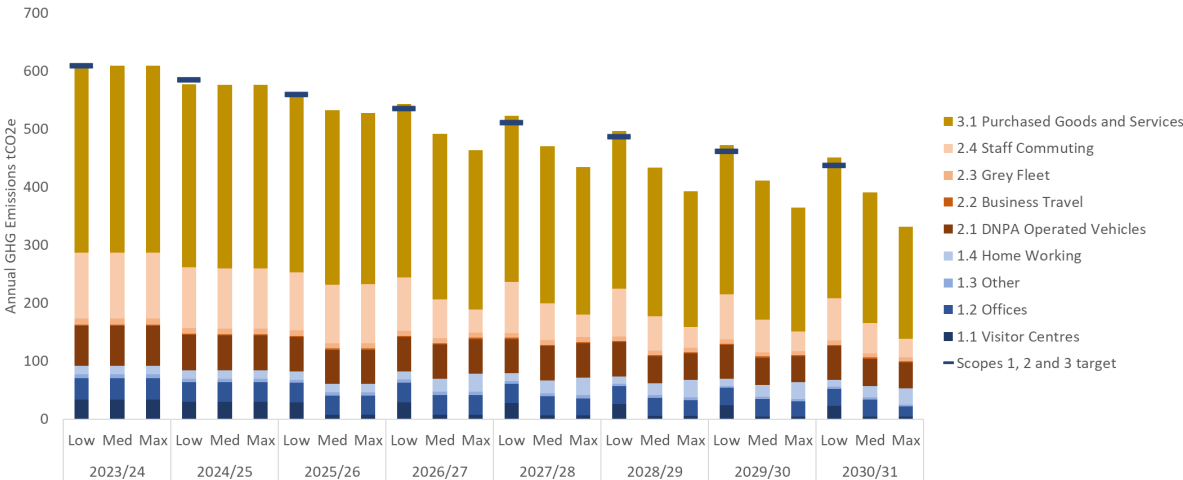


Figure 9: Projected emissions for the three scenarios to 2030/31 for buildings, transport and procurement and sub-categories

The projected scenarios compared to the derived targets presented in Figure 7 are shown in Figure 9. This confirms that for a target for Scopes 1 to 3, the Low scenario will just exceed the target. Aiming to achieve additional measures from the more ambitious scenarios could help mitigate the risk of procurement emissions not falling as much as modelled. If procurement is excluded from Scopes 1 to 3 (middle image in Figure 9), then the result is similar in that Low may be just capable of meeting the target. Most of the reduction observed when looking at this scope of the footprint is due to electricity, both the reduction in carbon intensity of the grid, and an accompanying increased in EVs used for commuting and in DNPA’s fleet. When looking at Scopes 1 and 2 only, the derived target is more ambitious as the SBTi align this to a 1.5°C pathway (rather than a 2°C pathway for Scope 3). Here, it is shown that achieving all the Medium measures comes close to meeting that target. This implies four additional EVs replaced within the fleet. Further measures from the Maximum scenario can help provide increased confidence that this target will be met.

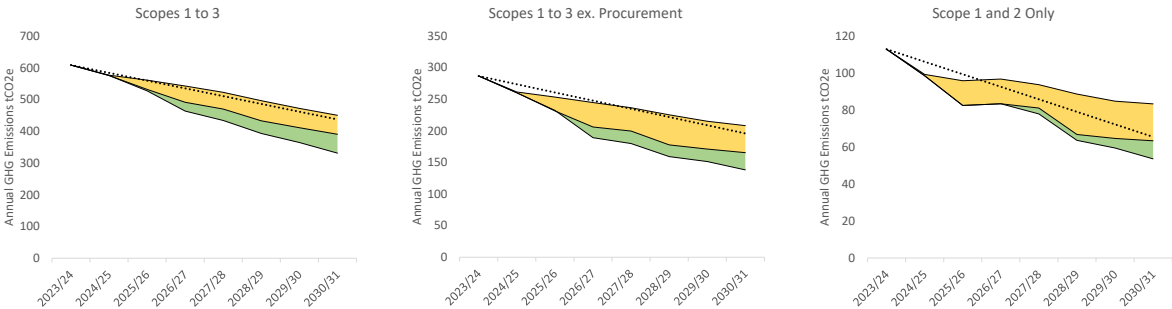


Figure 10: Projected emissions for Low (top of yellow area) with potential savings if Medium (yellow) and Maximum (green) measures are achieved, compared to the equivalent SBT trajectory (dotted line) for Scope 1 to 3 emissions aside from pensions and woodlands (left), excluding procurement (middle), and just Scopes 1 and 2 (right)

7 Conclusions

Following an appraisal of DNPA's 2023/24 GHG Inventory it was shown that the existing target of achieving carbon neutrality for scope 1 and 2 emissions by 2025 has outlived its usefulness as it would already be met if GHG removals were included and could not be met otherwise. Perversely, under the existing target and reporting boundaries, DNPA could significantly *increase* its emissions and still be 'net-zero'.

Science-based targets developed by the SBTi were applied to DNPA's GHG Inventory. Whilst these standards can only formally be adopted by corporations, it is encouraged that any organisation consider the underlying methods and targets. Following this, the following is recommended regarding setting a near-term target for DNPA:

- **Woodlands/Land Use:** FLAG emissions for DNPA are negative, namely there is a net removal of GHGs due to woodland owned by DNPA. These cannot be used to offset emissions from the remainder of DNPA's footprint. It is recommended that DNPA restate their commitment that no deforestation take place and that measures are put in place to protect and enhance uptake of GHGs from the atmosphere here. In addition, further efforts should be made to better understand the flux of emissions from non-woodland land owned by DNPA.
- **Pensions:** Emissions from pensions dominate the footprint. As reporting of pensions is optional within the GHG Protocol, that the projected emissions from pensions are similar to a required target set using SBTi, and that DNPA has effectively no influence on decisions made by the pension fund, it is recommended that pensions are not explicitly included within a target. However, there would still be value in separately reporting the annual performance.
- **Remaining emissions:** In 2023/24 GHG emissions excluding the woodlands and the pension were 609 tCO₂e. This comprises Scope 1 and 2 emissions (buildings and vehicles) and Scope 3 emissions (energy-related emissions, procurement, business travel, and commuting). It is recommended that three targets are set for 2030/31 as follows:
 - A headline target of 438 tCO₂e for all emissions excluding pensions and woodlands (calculated by reducing Scope 1 & 2 emissions by 42% and Scope 3 emissions by 25%).
 - Secondary targets for Scope 1 & 2 emissions (i.e. excluding woodlands) only of 66 tCO₂e (calculated by reducing Scope 1 & 2 emissions by 42%), and 196 tCO₂e for Scopes 1 to 3 excluding procurement.

In addition, DNPA should commit to a long-term target of achieving net-zero no later than 2050, which must include at least a 90% reduction in emissions so that emissions in 2050/51 are no greater than 61 tCO₂e.

It is recommended that the following are monitored:

- **Annual Inventory:** DNPA's greenhouse gas inventory should be produced on an annual basis using the same coverage as reported for the 2023/24 baseline. This should include reporting of woodlands and pensions, even though they fall outside of the SBT boundary.
- **Reviewing Targets:** To ensure consistency with the most recent climate science and best practices the near-term target must be reviewed, and if necessary, recalculated at a minimum every 5 years i.e. at the point of the 2028/29 footprint. At this point, the 2050 date for the long-term target should also be reviewed with a view to bringing it forward if DNPA can identify clear pathways it could take to achieve this.

- **SBT Targets:** The annual footprint should be compared to each of the three derived near-term SBT targets, with the Scopes 1 to 3 (excluding woodlands and pensions) taken to be the headline target.
- **Buildings:** Building energy consumption should be separately examined annually to ensure that it as a minimum does not increase. Steps should also be taken to identify energy efficiency projects.
- **Fleet:** The proportion of DNPA's fleet that is electric should be established on an annual basis with a target of at least 32% (8 out of 25) by 2030/31, implying at least one replacement per year on average.
- **Commuting:** A commuting survey should be conducted annually, and steps should be taken to ensure FTE-weighted homeworking are at a minimum 1.5 days/week, though ideally higher (up to 3.5 days/week). The proportion of car commuting journeys made by EV should also be monitored, with a target of 36% by 2030/31. Delivering charging infrastructure or pay incentives for staff purchase of EVs can help support this.
- **Procurement:** Steps should be taken to engage with significant suppliers to both establish more specific data to facilitate calculation of procurement emissions, and to prioritise suppliers who are committed to reducing emissions, for example by aligning to the SBTi's targets themselves. Further analyses based on supplier should be undertaken to rank top suppliers. It is often possible to capture 80% of spend from a manageable number of suppliers.