

ACCOUNTABILITY AND GOVERNANCE BOARD

22 April 2025

Environmental Strategy

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Cover Report

1. Police and Crime Plan

This paper provides an update on progress against the Environmental Strategy 2022-2027 for the board's consideration, focusing on the *low carbon and sustainable estate* workstream. This strategy was jointly sponsored and developed by West Midlands Police (WMP) in consultation with West Midlands Police and Crime Commissioner (WMPCC).

The previous update in November 2023 to the Strategic Policing and Crime Board set out the aims of WMP's Environmental Strategy and key initiatives and provided updates on strategy delivery including the anticipated outcomes of the Carbon Trust greenhouse gas emissions report, which was to be finalised in January 2024.

The work described in this report links directly to the 2021-2025 Police and Crime Plan, which includes a statement in Section 1: "*I will make West Midlands Police a greener and more environmentally sustainable Force*". This sets out how we will measure success as:

- Increasing the proportion of energy in the West Midlands Police estate which comes from renewable providers
- Reduce carbon dioxide emissions from energy usage within the West Midlands Police Estate
- Reduce the average carbon dioxide emissions from the West Midlands Police fleet by ensuring that vehicle service appointments are kept and through the monitoring of driver behaviours

2. Achievements and Challenges

The Carbon Trust greenhouse gas emissions report was completed and circulated in January 2024. This set out a roadmap of actions required to achieve WMP's Net Zero carbon emissions ambition by 2035, the initial steps of which are now in progress across the work areas detailed in this report.

Achievements

Carbon management – targeting high energy consuming sites

The Carbon Trust decarbonisation action plan recommended focusing carbon reduction efforts on the highest energy consuming sites. These eleven sites represent 71% of all

electricity use and 35% of all gas use. They will need to decarbonise over the next five years in order to deliver WMP's carbon reduction ambitions.

The initial focus is to reduce energy demand on these sites as far as possible. An action plan has been developed to support this work covering activities in the following areas and led by the Force's engineering team and Environment and Sustainability Manager; energy management, energy controls, building refurbishment, LED lighting, pipework insulation, motors and drives, low carbon heat, solar PV, refrigerants, behaviour change and usage monitoring. Delivery of actions is currently through incorporation into estates refurbishment projects.

It is acknowledged that the programme of refurbishment within the estates strategy will not address the majority of the priority sites within the required timeframe. A different approach will be needed to accelerate progress and take advantage of the invest to save opportunities for these buildings. To facilitate this, an invest to save proposal is planned with the initial aim to accelerate the roll out of LED lighting projects on 6 sites. The next stage is to undertake site surveys to develop a costed proposal for review by Finance Governance Board in 2025/26.

WMP's new recycling and waste contract

The Environmental Strategy 2022-27 identified a need to review and baseline waste and recycling and improve provision across the estate. Under the current arrangements the recycling rate is estimated to be circa 20 per cent of waste arising and opportunities for improvement within the existing contracts has been exhausted. It was identified that the limited monitoring data available was a barrier to targeting further improvements in participation.

After a formal tender process, approval was received in February 2025 to enter a new waste management contract for the estate to cover the Force operating area. The new contract will be mobilised in spring 2025 and will introduce mixed dry recycling and food waste recycling to all WMP managed sites. The changes implemented with this new service provider will ensure compliance with the Simpler Recycling regulations introduced under the Environment Act 2021.

The environmental strategy has also focused on opportunities for waste reduction and reuse, and the associated operational and cost benefits. In 24/25 the facilities and enabling team have partnered with WARP-IT to target furniture and equipment which enter waste streams during office moves. The WARP IT platform enables the inventory and redistribution of furniture and equipment and alongside charity donations is now in routine use as part of building clearance and office moves. For the six months of operation WARP IT has recorded 4 tonnes of waste avoided and £28k in avoided waste disposal costs.

Environmental Strategy Governance

A joint internal audit of the Environmental Strategy 2022-27 was completed in June 2024 focusing on the governance arrangements in place to support delivery. The recommendations of this report were implemented in full and resulted in a number of changes:

- The Environmental Strategy Working Group was relaunched with terms of reference adopted and improved representation across operational policing departments.
- Reporting lines were re-established to ensure the status of core deliverables are recorded quarterly and risks/issues escalated to Buildings Portfolio Board, chaired by Assistant Director Corporate Asset Management.

Work is ongoing to improve data quality and KPIs particularly in key areas of estate and fleet carbon and there are plans for the reintroduction of waste / recycling KPI planned enabled by the new waste management contract.

Challenges

Specific delivery challenges: funding and resources

Energy reduction opportunities need to be quantified and prioritised to enable business case proposals to be developed and funding to be committed. Whilst some progress can be made by aligning the estates programme and reactive maintenance with energy reduction goals, this will not deliver to the desired timeframes for carbon reduction targets nor capitalise on the invest to save opportunities which remain within the wider estate and on high energy consuming sites. The challenge this creates is to develop the pipeline of energy/carbon reduction projects whilst balancing the competing demand on the engineering and property functions whose primary remit is to develop fast-paced solutions to satisfy operational requirements.

Monitoring energy use and targeting interventions effectively will require a greater focus on energy management and specialist resource to support this activity. There is currently limited resource available to proactively monitor energy use and optimise building energy management systems.

There are no plans to transition away from gas in the short term on estate refurbishment projects due to the significantly higher cost of electricity and government funding only supporting initial capital costs. The replacement of heating systems may fall out of scope of refurbishment projects due to cost constraints, delivery timeframes and the need to maintain business continuity. The existing electrical supply capacity, cost and timeframes associated with reinforcement are an additional constraint on projects.

Heat decarbonisation funding for the public sector in the West Midlands is now under the control of WMCA. Future funding bids will require a new approach and greater partnership with local authorities to bid for funding. Due to the above constraints and subsequent challenge with obtaining organisational support for heat decarbonisation technology we are yet to develop a pipeline of projects for these funding opportunities.

Embedding into organisational decision making and governance

Achieving longer term carbon reduction goals requires the alignment of estates and fleet strategies. The Carbon Trust commission and the forthcoming Cenex project to advise on the Fleet Transition Strategy will show what actions need to be taken. These recommendations then need to be formally adopted in relevant plans and projects.

A sustainability impact assessment is currently being trialled with Corporate Change to ensure corporate projects with a potential to impact the environmental strategy goals are identified at inception and mitigation plans developed. This approach could be extended to all governance papers and processes if successful, in the same way as all papers currently include consideration of financial, legal and equalities implications.

3. Actions undertaken

In addition to the actions noted above, a briefing note has been produced for the estates programme stakeholders to disseminate the Carbon Trust recommendations.

The note was endorsed by Corporate Asset Management's Buildings Portfolio Board and identifies the key energy/carbon reduction opportunities that should be incorporated in estate refurbishment projects.

4. Future Work

A number of measures will be implemented at forthcoming major refurbishment projects at Wolverhampton and Stechford to improve thermal performance and reduce energy demand such as new double-glazed windows, LED lighting, loft insulation (Wolverhampton), upgraded building management systems, replacement of plant and installation of PV systems.

To support longer term decarbonisation, we are maintaining engagement with heat network providers on potential connections for Wolverhampton and West Bromwich town centres which could include our police stations if implemented.

A 54.6 kWp solar PV installation is planned for the roof of the Tally Ho! Warehouse, with an anticipated payback period of 7-8 years, to be carried out following some roof maintenance and insulation works during 2025-26, with scope to expand this to a further three sites pending feasibility studies.

The carbon reduction project pipeline continues to be developed, and it is critical that the necessary resource and funding is in place to enable particularly invest to save opportunities across the 'top 10' consuming sites to be progressed or accelerated.

By engaging specialist engineering resource, supported by the existing environmental enabling budget, it is expected that feasibility and costing on this work will be mature enough to substantially contribute to the next iteration of WMP's Estates Strategy, as well as to bring standalone projects forward such as LED lighting and solar PV to Finance Governance Board for approval.

WMP needs to ensure that its strategic estate and fleet decision making aligns with carbon reduction goals wherever possible, and that environmental considerations are built into governance mechanics.

An Energy Coordinator role is proposed using existing FTE within Corporate Asset Management to provide improved oversight over utilities consumption, enabling a more proactive approach to energy management particularly on large sites.

Working with Cenex, development of a Fleet Transition Strategy will commence in April 2025 and identify the role and deployment of EVs and alternative fuel technologies in WMP's future fleet and associated infrastructure requirements and costs. The first phase of this work is due to report in August 2025. However, WMP currently have a mixed fuel fleet consisting of 1764 vehicles. Of which 201 are Diesel/Petrol Hybrid and 67 are EV resulting in a total 15%.

In 2025/26 the work plan also includes the development of an organisation-wide travel plan and policy to incorporate business travel and commuting and associated initiatives with the potential to improve car parking management and reduce associated environmental impacts.

Finally, the work on heat decarbonisation will be developed further by undertaking a feasibility study on Air Source Heat Pump retrofit on a single site to get a better

understanding of cost vs benefit and support readiness for external funding opportunities.

5. Financial Implications

The following cost implications have been documented in the Comprehensive Spending Review submission.

Item	2025-26	2026-27	2027-28	2028-29	Commentary
	Recurring Revenue (£000s)	Recurring Revenue (£000s)	Recurring Revenue (£000s)	Recurring Revenue (£000s)	
Estate - EV	£0	£0	£0	£0	Plans for EV charge points are included as part of the future estates programme
Estate – Other	£1,700	£6,200	£6,700	£7,700	Estates Strategy Green Agenda sums for 2025-26 and 2026-27 plus £200k budget from CAM recurring, plus provisional numbers from the Carbon Trust Decarbonisation Plan
Transport – EV	£2,700	£2,781	£2,864	£2,950	Carbon trust estimate values – to be developed further with the Fleet Transition Strategy
Transport – Other					This is still to be worked through
Energy/management					This is still to be worked through
Supply Chain	£0	£0	£0	£0	This is recognised in the social value element of WMP's Procurement Strategy. We have seen low uptake on this to date and therefore no material change to contract values.

6. Legal Implications

In June 2019, the government committed in law to achieving 'net zero' greenhouse gas emissions by 2050 (passing secondary legislation to the Climate Change Act 2008). The overall responsibility for achieving net zero was assigned to the Department for Business, Energy, and Industrial Strategy (now replaced by Department for Energy Security and Net Zero) which published the Net Zero Strategy two years later in October 2021, committing government and wider public sector to lead the transition to net zero by example.

The government aims to reduce direct greenhouse gas emissions from public sector buildings by 75% by 2037 against a 2017 baseline. To help public sector organisations achieve this, the government has committed to produce guidance on emissions monitoring and reporting for the sector. This is intended to ensure these organisations have the right information and incentives to identify decarbonisation opportunities and better manage their energy and emissions. This guidance is due to be published during 2025.

The Public Sector Decarbonisation Scheme has also been established to accelerate direct emissions reductions and build capacity and capability within the sector. In addition, the Police and Crime Commissioner has a legal duty to ensure an efficient and effective police force in accordance with Section 1 (6) of the Police Reform and Social Responsibility Act. The reduction and management of energy demand and the continued support for decarbonisation of the force estate is part of that ongoing legal duty.

7. Equality Implications

None identified.

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Background

The following tables show performance against the metrics defined in the Police and Crime Plan (2021-2025) for the financial year 2023/24.

Table 1: Renewable energy generation (from installed capacity kWp)

Year	Installed renewable energy capacity (kWp)	% change from baseline (22/23)
2022/23	462	-
2023/24	653	+41%

The figures in Table 1 relate only to installed capacity of standalone renewable technologies installed on WMP buildings i.e. solar photovoltaic (PV) systems. Current installed capacity delivers the equivalent of approximately 2% of WMP's total annual electricity consumption. There are three further solar PV installations planned for delivery in 2025/26.

Table 2: Carbon dioxide emissions from the estate (from billed kWh)

Year	CO2e (tonnes)	% change from baseline (22/23)
2022/23	9606.6	-
2023/24	9911.1	+3.2%

Table 2 represents carbon dioxide emissions from electricity and gas consumption on the WMP estate (owned and operated buildings). The increase in emissions compared against the 2022/23 baseline was driven by an increase in electricity consumption in 2023/24, whilst gas consumption fell. For the first three quarters of 2024/25 both electricity and gas consumption are showing a reduction on the previous year.

Table 3: Carbon dioxide emissions from fleet (from litres of fuel purchased)

Year	CO2e (tonnes)	% change from baseline (22/23)
2022/23	5743.5	-
2023/24	5932.6	+3.3%

Table 3 represents carbon dioxide emissions from WMP fleet fuel consumption. Forecourt diesel consumption by the fleet has fallen, whilst petrol consumption has risen; when bunkered fuel use is also included, we see an overall increase of just over 3%. WMP now has 201 mild hybrid vehicles and 67 EV; this has supported the move away from diesel but not yet provided a reduction in emissions. The forthcoming Fleet Transition Strategy will make recommendations on the adoption of electric and alternative fuel vehicles.