Sustainable Development

Management Plan (SDMP) Guidance

Guidance for writing a Board level SDMP

Version 2.0

Contents

A comprehensive glossary of sustainability terms can be found in the NHS Carbon Reduction Strategy www.sdu.nhs.uk/publications-resources/3/NHS-Carbon-Reduction-Strategy

An SDMP sets out three things:

1. An Action Plan for delivering the organisation's sustainability objectives
2. The metrics that will be used to monitor and review the progress of the plan
3. The governance and accountability arrangements for ensuring the plan is delivered and the benefits realised

? Does this guide show the evidence behind the case for an SDMP?

No. However, if you'd like to know more about the huge financial, health, risk management and reputational benefits of improving your sustainability performance, please visit http://www.sdu.nhs.uk

An SDMP is a board approved document that assists organisations to clarify their objectives on sustainable development (SD), and set out a plan of action.

It will help your organisation to:

- meet minimum statutory and policy requirements of SD
- save money through increased efficiency and resilience
- improve the environment in which care is delivered, for both patients and staff
- have robust governance arrangements in place to monitor progress
- demonstrate a good reputation for sustainability
- align SD requirements with the strategic objectives of the organisation

This guidance document will help you write an SDMP which identifies, monitors and prioritises the actions needed to improve sustainability performance while reducing carbon footprint. The majority of the raw data you need to meet minimum requirements is already collected, and simply needs to be collated, reported and managed.

STRUCTURING YOUR ACTION PLAN

- Tailor your focus to appropriate areas of sustainability

- Use the checklist on page 4 to meet minimum standards

- Ensure an integrated approach using the structure of the NHS Carbon Reduction Strategy (CRS)

- Use the Route Map for Sustainable Health to guide your approach to SD.

The tips on page 5 can be used to support your organisational approach to developing cross functional plans. On page 6 is a sample SDMP Action Plan with suggested headings and ideas for improving performance.

?

What is the Carbon Reduction Strategy (CRS)?

The CRS sets an ambition for the NHS to move towards a low carbon society. Published in response to the Climate Change Act, it recommends key actions for the NHS to become a leading sustainable and low carbon organisation.

SDMP checklist

Meeting the criteria below will give assurance to the Board that your organisation is meeting the minimum statutory, regulatory and NHS policy requirements for sustainability.

Our SDMP:

Governance

	is approved annually by the Board*
	outlines governance arrangements for reporting progress and assurance*
	defines the overarching sustainability mission statement in line with core business
	lists the organisation's sustainability objectives and cross-functional input
	specifies the board level executive/non executive lead for sustainability
	encourages sustainability in other organisations, e.g. through contractual requirements
	contains action for a sustainability statement to be included in all staff job descriptions

Each action in the plan includes:

Action Plan

	time frames and milestones
	a named person responsible for delivery
	reporting arrangements (including exception reporting parameters)
	quantitative measures
	baseline figures and performance targets
	responsibilities/accountabilities for development, implementation and monitoring

Our SDMP demonstrates progress by:

Monitoring and reporting

	monitoring and reporting on building energy, waste and water carbon emissions*
	outlining the process for compliance with the HM Treasury sustainability requirement*
	setting an absolute carbon reduction target of 10% by 2015 on a 2007 baseline*
	setting annual targets for absolute reductions on a trajectory that ensures the above
	outlining the specific metrics used to monitor progress and provide assurance
	outlining public reporting arrangements, e.g. what's included in annual reports
	monitoring carbon emissions related to procurement and travel, including patients, public and staff

Our SDMP contains:

Sections

	a risk assessment and mitigation plan outlining management of risks posed by climate change*
	a section on adaptation*
	a plan of action for compliance with the Carbon Reduction Commitment (CRC)*
	coverage of the 10 areas identified in the Carbon Reduction Strategy for England

* Criteria marked with an asterisk are the most effective indicators of compliance.

Tips for producing an SDMP

The following tips can help ensure that new and existing plans cover all the bases needed for a high quality SDMP.

- Appoint an exec and non exec board level SD lead

- Establish a cross-functional sustainable development committee

- Involve all staff in developing and implementing the SDMP

- Include climate change in the organisation's risk register, to ensure compliance with the Annual Governance Statement (previously Statement on Internal Control) and the Civil Contingencies Act 2004

- Engage emergency planning and business continuity leads in creating adaptation plans

- Use the Good Corporate Citizen assessment model (GCC) to measure progress

- Consider developing a Marginal Abatement Cost (MAC) curve

- Look at real examples of SDMPs produced by other organisations

- Quantify the carbon reductions from the action plan

- Assess performance annually against your corporate SD objectives

- Regularly update the SDMP and Action Plan as necessary

- Report progress on targets regularly to the board including risks and responsibilities

Engage

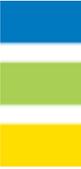Measure

Set targets

Report progress

DEC: Display Energy Certificate
ERIC: Estates Return Information Collection
GCC: Good Corporate Citizen
P4CR: Procuring for Carbon Reduction

Area of CRS	SDMP Objective	Plan	Timeframe/ Delivered by	Metrics to measure performance	Baseline Figure
1. Energy and Carbon Management	Agree energy saving and carbon reduction targets (e.g. reduce absolute carbon emissions by 3% this year)	Examples: Run a staff energy awareness campaign; Install local hot water boilers; Implement software to turn office computers off overnight; Install energy efficient lighting		Potential Sources: ERIC data; DEC advisory report; Metered energy use; NHS Reporting on Sustainability Framework tool	
2. Procurement and food	Agree carbon reduction targets for procurement (e.g. reduce waste, cost and carbon emissions from goods and services by 2% this year)	Examples: Review lean ward restocking policy; Review high expenditure goods and services to identify action; Use local food suppliers and businesses; Encourage/require suppliers to develop their own SDMPs		Potential Sources: P4CR framework; Procurement section of the GCC assessment model; Government Buying Standards and Greening Public Procurement	
3. Low carbon travel, transport and access	The emphasis should be on providing low carbon models of care by focussing on care closer to home, telemedicine, videoconferencing for meetings. etc. (e.g. teleconferencing to replace 5% of business miles)	Examples: Review recurring business mileage expenditure to identify meetings that could be conducted by teleconference; Develop an active travel plan that promotes public transport, cycling and walking		Potential Sources: NHS Reporting on Sustainability Framework tool; Business mileage expense data from finance dept; Staff travel surveys; Travel section of the GCC assessment model; Energy Saving Trust fleet review	

PAM: Premises Assurance Model
UKCIP: UK Climate Impact Project

Area of CRS	SDMP Objective	Plan	Timeframe/ Delivered by	Metrics to measure performance	Baseline Figure
4. Water	Ensure the efficient use of water by measuring and monitoring its use (e.g. reduce metered water use by 2% this year)	Examples: Set stretching targets around operational response time for repairing leaks; Avoid the routine purchase of bottled water unless clinically required; Install water efficient technology;		Potential Sources: Local water company may be able to provide carbon data and identify leaks; Consumption data e.g. monitored for ERIC; NHS Reporting on Sustainability Framework Tool Environment Agency	
5. Waste	Monitor, report and set targets on management of domestic and clinical waste, including reduction and appropriate disposal of waste in medicines, food and ICT (e.g. increase % of organisational waste recycled by 15%)	Examples: Conduct an audit on appropriate segregation of clinical and domestic waste; Provide recycling facilities in public areas and offices; Work with suppliers to reduce the amount of packaging products come in		Potential Sources: Contracts and collection receipts; Data e.g. monitored for ERIC; Facilities Management section of the GCC assessment model; NHS Reporting on Sustainability Framework Tool	
6. Designing the built environment	Ensure built environments are designed to encourage SD and low carbon usage, and to promote wellness and resilience to climate change in every aspect of their operation	Examples: Plan improved access and increased green space in hospital grounds; Carry out a risk assessment: are buildings resilient to projected changes in climate, and to weather extremes? Refurbish buildings to reduce carbon (e.g. wall insulation)		Potential Sources: Data e.g. monitored for ERIC; The DH PAM; The EA/UKCIP tools; Buildings section of the GCC	

CSR: Corporate Social Responsibility
JD: Job Description

Area of CRS	SDMP Objective	Plan	Timeframe/ Delivered by	Metrics to measure performance	Baseline Figure
7. Organisational and workforce development	Support staff by promoting increased awareness, supporting behavioural change, encouraging home working, low carbon travel and the use of ICT (e.g. all staff are aware of the benefits of acting sustainably and have the skills and competencies to implement sustainability initiatives)	Examples: Include a section on sustainability in staff induction; Include sustainability as a duty in all JDs; Promote the development of leadership competencies to deliver carbon reduction and improved CSR performance; Review workforce policies to ensure they promote sustainable behaviour		Potential Sources: % of staff who have received training on sustainability; Workforce section of the GCC assessment model; NHS Reporting on Sustainability Framework tool	
8. Role of partnerships/ networks	Consolidate partnership working and community engagement and make use of its leverage within local frameworks (e.g. the organisation is an active member of the local sustainability and/or climate change network)	Examples: Develop resilience plans to deal with projected changes in climate and extreme weather events with partners; Outline a communications plan for reporting on sustainability to the public; Develop a patient and public engagement plan; Develop a whole systems approach by specifying how the organisation will engage with partners to deliver SD.		Potential Sources: Environment Agency and UKCIP tools; NHS Reporting on Sustainability Framework tool; Organisation's Annual Report; Climate Change partnerships	

? CIA: Carbon Impact Assessment
MAC: Marginal Abatement Cost
EMS: Environmental Management Systems

Area of CRS	SDMP Objective	Plan	Timeframe/ Delivered by	Metrics to measure performance	Baseline Figure
9. Governance	Ensure governance processes are in place to ensure sustainability is embedded in the organisation (e.g. sustainability is considered in every decision made by the board)	Examples: Clear SD targets and actions needed to meet legal, NHS and organisational targets Regular monitoring with actions showing progress; Service delivery decisions consider SD impact, e.g. using CIA Financial decisions consider whole lifecycle costing		Potential Sources: EMS Governance summary on SDU website; Carbon Impact Assessment template on QIPP evidence	
10. Finance	Quantify cost and carbon reduction options as part of efficiency improvements including QIPP (e.g. triple bottom line for sustainabili-ty: carbon, social and cost impact assess-ment performed for all projects)	Examples: Whole lifecycle costing for procurement contracts; Net present value and return on investment for projects; MAC curves for all large investments and projects		Potential Sources: NHS Reporting on Sustainability Framework tool; Save Money by Saving Carbon for information about MAC curves	
Adaptation - not in CRS but is a requirement for an SDMP Action Plan	Includes forward planning, raising awareness, increasing resilience, managing risks and taking advantage of any potential benefits (e.g. service delivery plans include forecast of size and profile of population, climate and resilience to extreme events)	Examples: Create a section in the organisational risk register that addresses the challenges of building resilience to climate change and covers the legal, financial, organisational, reputational and service risks		Potential Sources: NHS SDU Guidance on Adaptation; The EA/UKCIP tools Risk register; Climate Change Partnerships	

Overview of Tools for Measuring and Monitoring Progress

The majority of the raw data you need to monitor the performance of your SDMP is readily available. The tools and frameworks below will allow you to:

- establish baselines
- analyse the data from a sustainability perspective
- measure and assess the impact of your SDMP

Good Corporate Citizenship (GCC) Assessment Model

The GCC demonstrates the level of commitment and performance on SD over 6 key areas.
It will help you create an organisational baseline and identify areas for action.
It enables you to benchmark yourself against other regional and national organisations.

Further information:
www.sdu.nhs.uk/sd_and_the_nhs/sd-governance/good-corporate-citizen.aspx

Procurement for Carbon Reduction (P4CR)

The P4CR is designed to support procurers in the NHS and wider health and social care sector in prioritising high impact actions for reducing carbon emissions. It includes:

- an engagement toolkit
- a prioritisation tool (SCO2PE) quantifying the CRS procurement category
- a flexible framework for performance assessment

Guidance available here: www.sdu.nhs.uk/publications-resources/23/Procuring-for-Carbon-Reduction-P4CR/

Estates and Facilities Management System (EFM)

EFM is used to collect and analyse data or "returns" provided by trusts.
Data on areas such as building energy use, waste and water is used to calculate carbon emissions and to make comparisons with other organisations.
The data can be used to create benchmarks against which progress can be monitored.
This information has been published since 1999/2000 on the Information Centre website.

Published information: www.hefs.ic.nhs.uk/

EFM system: www.efm.ic.nhs.uk

NHS Sustainability Reporting Framework Spreadsheet

This tool uses readily available organisational data to produce a sustainability report in compliance with HM Treasury mandatory accounts.

It measures performance in areas including energy, waste, water and travel. It also covers adaptation plans and SDMPs. It can provide metrics to inform the CRS areas 1, 3, 4, 5 and 7.

Further information: www.sdu.nhs.uk/sd_and_the_nhs/reporting.aspx

Marginal Abatement Cost Curves (MAC)

The MAC curve condenses cost effectiveness data into a graph clarifying which carbon reduction measures save the most money, helping you assess and prioritise action in any of the CRS areas.

Guidance available: www.sdu.nhs.uk/publications-resources/9/Save-Money-by-Saving-Carbon-/
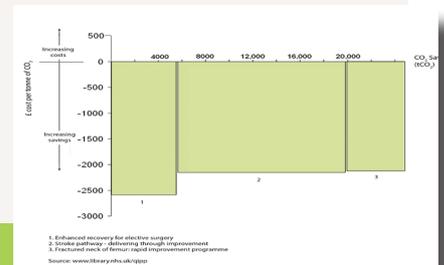
The Environment Agency's adaptation tools

The EA is a Government delivery body in England which helps organisations adapt to climate change. They work with UKCIP to provide a range of tools, methods and guidance which help organisations identify how they might be affected by climate change, and what they can do to minimise risks and exploit opportunities.

A particularly useful tool for those putting together the organisational adaptation plan is the UKCIP Adaptation Wizard: www.ukcip.org.uk/wizard/

Further information: www.environment-agency.gov.uk/adaptation

An SDMP helps to deliver your organisational objectives by ensuring that the objectives you set contain targets that can be regularly reviewed and reported.

Is the SDMP agreed by partners and are processes in place?   Progress

	Review has not taken place; no baseline or targets; implementation not started
	Areas reviewed; some baselines and targets set; implementation of SDMP started
	Targets agreed with all partners and SDMP implemented
	Progress against agreed targets reported to board annually against SDMP

? **Who are my partners?**

"Partners" can include boards of provider organisations, boards of commissioning organisations, SHAs, voluntary sector, private sector, patient and public representatives and Local Authorities.

Does the SDMP target all core areas listed in the sample Action Plan*?   Quality

	Up to five
	Six to ten
	All areas
	The SDMP includes exemplar actions and is promoted nationally as exemplary

* attached in the Appendix

Comparing the quality of your SD performance to others

- Complete the Good Corporate Citizenship Assessment Model (see Overview of Tools)
- Visit www.erpho.org.uk for the carbon footprint associated with energy, waste and water usage for every NHS organisation in England.
- Become an active member of your regional sustainability network. The NHS SDU can put you in touch with your regional lead.

Does the SDMP meet its targets?   Scope

	Below agreed targets in most areas – inadequate performance
	Above agreed targets in some areas – adequate performance
	Consistently above agreed targets – good performance
	Well above agreed targets – strong performance

The health and care sector undergoes regular structural and organisational change. This poses a particular challenge when monitoring the NHS carbon footprint, as consistent baselines are essential when demonstrating that the UK is meeting the targets outlined in the Climate Change Act 2008.

These general principles will help you in times of transition:

- Have a board approved SDMP for each legal entity
- Include scope 1, 2 and 3 emissions in carbon footprinting consistent with NHS England
- Embed SD in transition plans, legacy arrangements and documents
- Actively participate in local health sustainability networks
- Estimate baseline carbon footprints if not available from 2007
- Implement your action plan and monitor progress
- Benchmark your performance against other similar organisations
- Put in place succession planning arrangements for your SD leads
- Maintain contact with your regional SD Lead

Estimating figures for the carbon footprint

The following could be used to estimate unknown figures for the carbon footprint. These can be used for apportionment e.g. for leased buildings or backcasting to previous years e.g. to estimate the 2007 baseline for organisations that have been created since 2007. Direct measurement should be used where these figures are available. Where figures are not available an estimate could be used to support evidence of action.

Options:
- Population served
- Income
- Expenditure
- Per square metre (m^2)
- Staff numbers (e.g. Full Time Equivalent)

Any estimates should include the following:
- What bases have been used?
- Why was this base used?
- Alternative options and scale of change with alternative assumptions
- Shortcomings of base used

? What are the three scopes of greenhouse gases, and how do I measure them? Find out here: www.sdu.nhs.uk/publications-resources/59/APHO-Technical-Briefing-9-Measuring-Sustainable-Development/
Also see Example Monitoring the 10% section on the next page

Italics indicate estimated figures: calculations should be separate and should include:
- Method used for estimation, e.g. population, activity, % of footprint, expenditure
- Discussion of alternative methods including quantifying the change in estimated figures

CRS category	Category description	2007/08 tCO$_2$e	2008/09 tCO$_2$e	2009/10 tCO$_2$e	2010/11 tCO$_2$e	Target reduction by 2015 tCO$_2$e	Target reduction by 2015
Building energy use	Owned buildings - gas	24,241	24,888	25,054	22,911	7,272	30%
	Owned buildings - coal/oil	0	0	0	0	NA	
	Electricity	6,079	6,955	10,270	17,839	1,824	30%
	Leased assets (upstream)[1]	1,844	1,771	1,906	1,833	184	10%
	Business travel - air	32,164	33,614	37,230	42,583	9,280	29%
Exclude from total	Leased assets (downstream)[1]	2,075	2,125	2,296	2,029	NA	
Travel	Business travel - air	23	43	19	16	5	20%
	Business travel - road	954	1,060			191	20%
	Business travel - rail[2]	60				-6	-10%
	Patient/visitor travel[3]	13,831					
	Employee commute	4.825				965	20%
	Travel total	19,692	-	-	-	1,154	6%
Procurement	Capital goods	9,000					
	Healthcare from other providers	112					
	Pharmaceuticals	3,766					
	Medical instruments	12,365				1,237	10%
	Waste and water	330				99	30%
	Other	62,427				2,497	4%
	Procurement total	88,000	-	-	-	3,833	4%
	Grand total	139,856	-	-	-	14,267	10%

[1] gas, coal, oil and electricity   [2] use of public transport estimated increase   [3] non-emergency

In putting together your SDMP you may come up with a number of questions that you are unable to answer. As a first step it is useful to check the NHS Sustainable Development Unit website as there are a number of guidance documents and technical documents available that may help.

If you are still unable to find the answer please do not hesitate to contact your regional lead or the SDU team – the contact numbers are on our website at www.sdu.nhs.uk

Below are some of the SDMP FAQs.

1. Who is responsible for leased premises?
2. Who is responsible for Private Finance Initiative premises?
3. How do I create a baseline?
4. What happens if I do not have data for the year 2007?
5. What is an Environmental Management System (EMS) and why is it useful?
6. What are the minimum requirements I have to fulfil around sustainability?
7. Are Foundation Trusts subject to the same requirements?
8. What are the key requirements to be included in an adaptation plan to demonstrate compliance with the statement on internal control?
9. How do I start to include travel estimations in our organisation's footprint?
10. My organisation uses the standard suggested metrics for measuring sustainability performance. What alternative metrics are available to measure sustainability in a broader sense?

You may also find these links useful when putting together your SDMP:

Space for health website - DH guidance for Estates and Facilities:
http://www.spaceforhealth.nhs.uk
BREEAM standards e.g. In Use: http://www.breeam.org/page.jsp?id=373
ISO 14001: http://www.iso.org/iso/iso_catalogue/management_and_leadership_standards/environmental_management.htm
ISO 50001: http://www.iso.org/iso/specific-applications_energy
Carbon per bed day calculation: http://www.erpho.org.uk/viewResource.aspx?id=20967
QIPP project Carbon impact assessment: http://www.evidence.nhs.uk/qipp
Carbon Trust footprint calculator: http://www.carbontrust.co.uk/cut-carbon-reduce-costs/calculate/Pages/Default.aspx

Ways to help providers contribute to the success of your SDMP

- Use contractual levers to compel your service and product providers to demonstrate their level of sustainability performance
- Encourage and support organisations you contract with to develop their own SDMPs

NHS buying power is immense, and a responsible and sustainable approach to procurement leads to health and well-being benefits for the local community.

Below is a form which will help you consider and discuss your own priorities as well as your expectations of other organisations:

Priority	My organisation	Stakeholder
Sustainability mission statement		
SDMP is in place		
Annual reports include sustainability section		
Awareness of current organisational footprint		
Carbon emission reduction (relative)		
Carbon emission reduction (absolute)		
Sustainability criteria included in business cases and models of care redesign		
Sustainability awareness training and education		
Use of GCC tool to assess progress		
Use of GCC tool to monitor progress		
Staff health and well-being policy		
Meeting or aiming for Carbon Trust Standard or equivalent		
Workforce reflects local diversity		

Clinical Commissioning Groups can also factor in the additional priorities:

Priority	Our CCG
Set objective sustainability measures and targets for providers in contracts	
Assess provider sustainability performance at performance management meetings	
Consider providers' sustainability credentials as part of tendering process	
Maintain regional oversight of health system carbon emissions	
Work with local authorities, providers and health and wellbeing boards to reduce health system carbon emissions	

Framework for assessment of SDMP

Trust Name	
Name of Board Approved Plan	

1. Scope

1.1 Is the core focus on carbon reduction, or a holistic approach to sustainability?

	1	2	3	4	5	
1 = Core focus: exclusive attention to carbon reduction						5 = Holistic approach: - integrated environmental, social and economic development approach to sustainability across business

1.2 Are each of the ten thematic areas from the NHS SDU CRS assigned specific and measurable action?

Thematic area	Referenced	Basic actions assigned	"SMART"/detailed actions	Fairly detailed
Energycarbon management				
Procurement and food				
Low carbon travel, transport,				
Water				
Waste				
Designing built environment				
Organisational/workforce				
Partnership/networks				
Governance inc. GCC				
Finance				
Adaptation				

1.3 What is the timeframe for this plan?

1-2 years	3-5 years	Longer	Unspecified

2. Quality

2.1 Does the Trust believe the plan will deliver the minimum legislative requirements* on carbon reduction? (NHS SDU guidance encourages a 10% reduction in CO2e by 2015 on a 2007 baseline)

	No		Yes		Yes, it exceeds them, and our targets* are:

2.2 Does the plan include clear milestones or success criteria?

* overall, energy, water, waste and procurement

	No		Yes

2.3 The plan includes joint working with:

	Partner or neighbouring Trusts/sector		LA/LSP		Patients and public		Other partners

2.4 The plan relates to corporate priorities, operating plans and wider trust commitments**

	Not at all		Some integration		Thorough integration

**e.g. JSNA, commissioning strategy plans for PCTs

2.5 The plan acknowledges climate change adaptation preparedness as a business risk via Board assurance frameworks

	Not at all		To some extent		Thoroughly

3. Governance

3.1 Does the plan set out clear governance structures which indicate that the plan is adequately embedded?

	No		Yes

3.2 Has a strategic Sustainability Committee (or similar) been established with representation from across the organisation?

	No		Yes		Unclear (please explain in this box)

3.3 If you answered "yes" to the above, does your Committee include a named board level lead?

	No		Unclear		Adequate representation		Inclusive representation

3.4 Has an operational Sustainability Committee (or similar) been established with representation from across the organisation

	No		Unclear		Adequate representation		Inclusive representation

3.5 If you answered "yes" to the above, does your Committee include a named board level lead?

	No		Yes		Unclear (please explain in this box)

3.6 The operational lead is:

	1	2	3	4	5	
1= mainly autonomous						5 = well integrated and has been given clear authority

3.7 The operational lead is based in the following department:

Estates and Facilities	Public Health	Corporate Services	Other	Unspecified

3.8 An operational lead has been identified to oversee specific objectives at an appropriate and proportionalte level

	1	2	3	4	5	
1= not at all						5 = very much in evidence

3.9 Does the plan include a risk assessment or equivalent? | | No | | Yes |

4. Resources and capacity

4.1 Training, awareness and communication of sustainability is integral to the plan

	1	2	3	4	5	
1= not at all						5 = very much the case

4.2 Financial resources have been identified and made available to deliver the plan

Not in evidence	Yes, though unspecific	Yes, and outlined	Unclear

4.3 Sufficient human resources (capacity, skills and seniority) have been identified and made available to deliver the plan

Not in evidence	Yes, though unspecific	Yes, and outlined	Unclear

5. Exemplar actions

5.1 Has the trust developed a carbon footprint?

	No		Yes

If "yes", describe below including name of contractor and scope of footprint.

5.2 The exemplary/ unique thinking demonstrated in this plan should be considered as part of future guidance (describe below)

Energy and carbon management	
Procurement and food	
Low carbon travel, transport, access	
Water	
Waste	
Designing built environment	
Organisational/workforce development	
Role of partnership/networks	
Governance inc. GCC	
Finance	
Adaptation	
Other/overall	

5.3 This plan could be promoted to other trusts as exemplary

	No		Yes

6. Support and opportunities

6.1 This is a comprehensive, in-depth plan supported by good governance and appropriate resources.

	True		Untrue - need support with sustainability		Untrue - need support with carbon reduction

6.2 Improvements are needed in these areas - refer to appropriate section numbers and please add further detail below.

Scope of plan (section 1)	
Quality of plan (section 2)	
Governance of sustainability (section 3)	
Resources and capacity (section 4)	