Carbon Offset Funds: Monitoring Report 2023

OCTOBER 2024

Contents

Summary

Carbon offset funds provide a source of funding for carbon reduction projects in support of net zero ambitions across London.

The London Plan requires Local Planning Authorities (LPAs) to monitor and report annually on the operation of their carbon offset funds. This report summarises the value of funds, expenditure, types of projects funded, and the governance and monitoring arrangements in place, and concludes with recommendations for LPAs.

In 2023, LPAs were successfully collecting and spending carbon offset funds, meaning more carbon reduction activity across London. More LPAs are spending their carbon offset funds and have governance arrangements in place compared with 2022. There has also been resource and governance changes to more efficiently enable carbon saving projects, contributing to a 39 per cent uptick in spending and allocation from 2022.

These latest results show a positive response to the Mayor's 2022 recommendations on delivering carbon savings through carbon offset funds.

Since 2016 the Mayor's carbon offsetting policy has catalysed **£333m across London to support activities that tackle the climate emergency.**

Of this £333m, **£146m has been collected by LPAs** and is available to spend on carbon saving projects.

There's been a 65 per cent increase in the total amount collected by LPAs since 2022.

31 of 35 LPAs have begun spending their carbon offset funds, compared to 26 in 2022.

Carbon offset fund expenditure has increased to £44.5m, representing a **39 per cent increase** from 2022.

More than 350 projects have been funded. Energy efficiency measures and **renewable energy projects** continue to be **the most popular across LPAs.**

This report

In early 2024, London's Local Planning Authorities (LPAs) responded to the Greater London Authority's (GLA) carbon offset fund monitoring survey. This survey is issued annually to monitor how the offsetting policy is delivered, the value of these funds and how they are being spent.

This report presents a summary of the survey findings and highlights examples of approaches taken by London's LPAs.

London's 35 LPAs include:

- **the 32 London boroughs**
- **the City of London Corporation**
- **the London Legacy Development Corporation (LLDC) in east London, and**
- **the Old Oak & Park Royal Development Corporation (OPDC) in west London.**

One LPA didn't respond to the survey – we have assumed values for this LPA are unchanged from 2022.

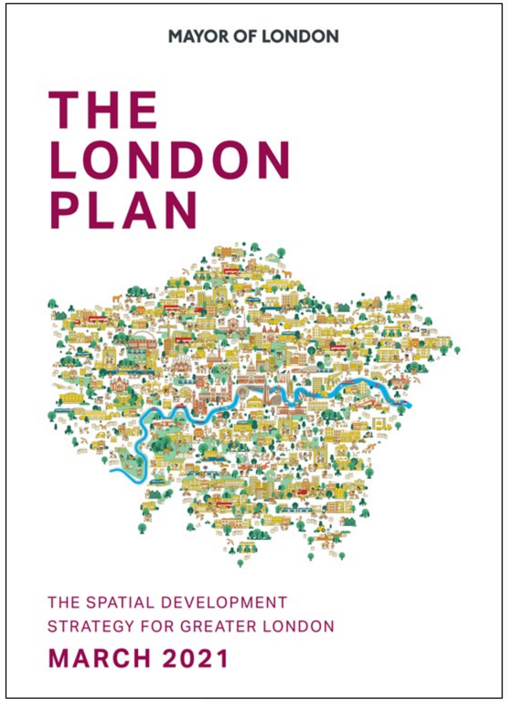
Introduction

The role of the planning system in the climate emergency

The London Plan

The London Plan is the Spatial Development Strategy for Greater London. It sets out a framework for how London will develop over the next 20-25 years and the Mayor's vision for Good Growth.

The Plan is part of the statutory development plan for London, meaning that the policies in the Plan should inform decisions on planning applications across the capital.



The London Plan is legally part of each of London's Local Planning Authorities' Development Plans and must be taken into account when planning decisions are taken in any part of Greater London.
All Development Plan Documents and Neighbourhood Plans have to be 'in general conformity' with the London Plan.

Planning and Net Zero Carbon

The Mayor has declared a climate emergency and is aiming for London to be net zero carbon by 2030. The planning system plays an important role in our response to the climate and ecological emergencies by reducing carbon emissions, integrating adaptation measures and resilience to the impacts of climate change; improving air quality and ensuring all new developments aspire to the highest sustainability standards. Without this action, we will only add to the number of buildings that need to be retrofitted and at a greater cost and disruption.

The London Plan's net zero carbon target applies to all major planning applications and year on year is incentivising on-site carbon reductions far beyond national building regulations. This progress is reported on an annual basis through our energy monitoring reports.

The London Plan ensures new development responds to the climate emergency by through mitigation and adaptation requirements for new buildings, ensuring resilience to climate change and reaching net zero by 2030.

Meeting the net zero carbon target

The London Plan requires all major developments* to achieve net zero carbon. There is a minimum requirement for a 35 per cent on-site carbon improvement on national Building Regulations.

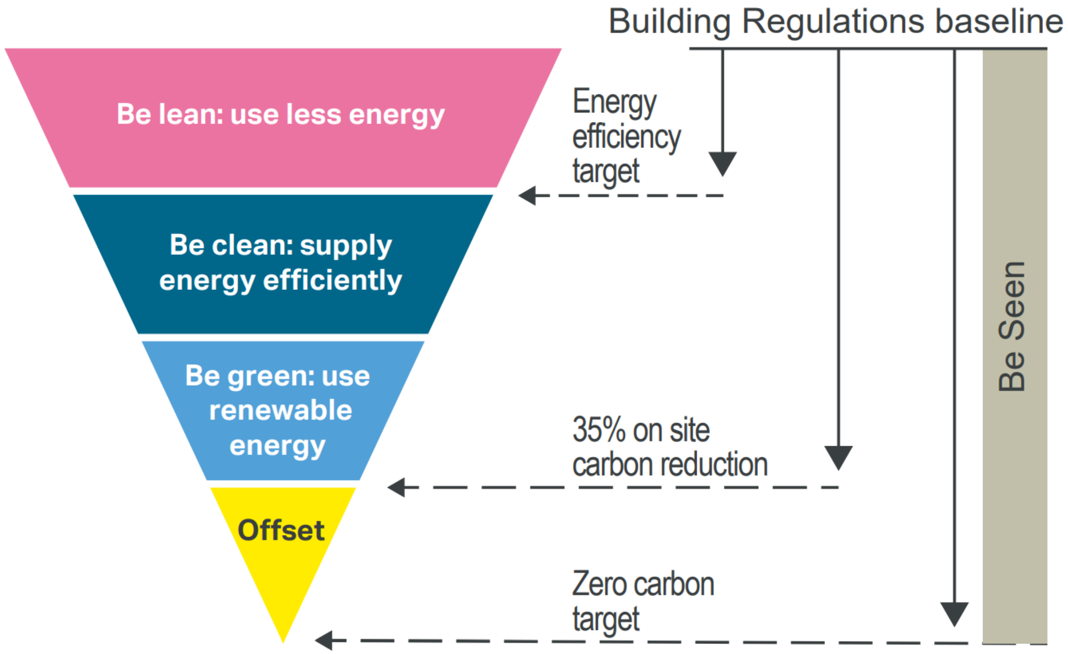
In 2023, we saw a 57 per cent saving in emissions from proposed new, referable developments when compared to the national Building Regulations. Further information is available in the 2023 Energy Monitoring Report.

Once on-site carbon reductions have been maximised, the shortfall to zero carbon is offset by making a cash-in-lieu contribution into the relevant LPA's carbon offset fund.

To meet the target, planning applicants are expected to follow the energy hierarchy:

- **'Be Lean'** – use less energy
- **'Be Clean'** – supply energy efficiently and cleanly
- **'Be Green'** – maximise renewable energy
- **'Be Seen'** – monitor, verify and report energy performance

The Energy Hierarchy



Planning applicants are expected to maximise savings on-site before paying to offset residual carbon emissions.

*Major developments are those with 10 or more units and those with >1000 m^2 of floorspace, not just those referred to the Mayor

Carbon offset funds

Until approaches and technologies improve to allow further on-site carbon reductions, carbon offset funds allow developers the flexibility to meet the London Plan net zero target. The carbon offset payment is secured through a Section 106 agreement.

Funds are collected by LPAs and are ring-fenced for carbon reduction projects in the respective LPA. It is important that these funds are used effectively as part of an LPA's response to the climate emergency.

Throughout this report, carbon offset funds are categorised as:

- **Secured** – the amount secured refers to the value of payments LPAs have secured by legal agreement with developers, to be collected in future.
- **Collected** – the amount collected refers to the value of payments received by the LPA from a developer, available to spend on carbon offset projects.
- **Committed to spend** – the amount committed to spend refers to carbon offset funds which have been allocated to carbon saving projects, but not yet spent.
- **Spent** – the amount spent refers to carbon offset funds which have spent on carbon saving projects.

Local Planning Authority Responsibilities

All LPAs are required to:

- **Collect carbon offset payments** for any major development with a carbon reduction shortfall.
- **Set up a carbon offset fund** – this includes developing a pipeline of projects to invest in.
- **Establish a local carbon offset price** or use the Mayor's recommended price (£95/tonne CO_2).

Further details are available in the GLA's *Carbon Offset Fund Guidance* (referred to as 'the guidance' in this report) which can be found here.

Carbon offset funds play an important role in funding carbon reductions from existing buildings, which can be more challenging compared to new buildings.

Results

Total value of carbon offset funds

Total cumulative value of carbon offset funds secured or collected since 2016: £332,900,000

LPAs have collected approximately £146 million in carbon offset funds and secured a total of £187 million through legal agreements.

The total value of an LPA's carbon offset fund is dependent on:

- the **number of planning applications** the LPA has received
- the carbon **offset price** used
- the **difference between on-site carbon reductions and net zero carbon** for each qualifying major development, and
- **when LPAs collect payments** i.e. at planning approval, commencement on-site or post-construction.

Total amount secured by legal agreement (but not yet collected)

£187,200,000

Total amount collected

£145,600,000

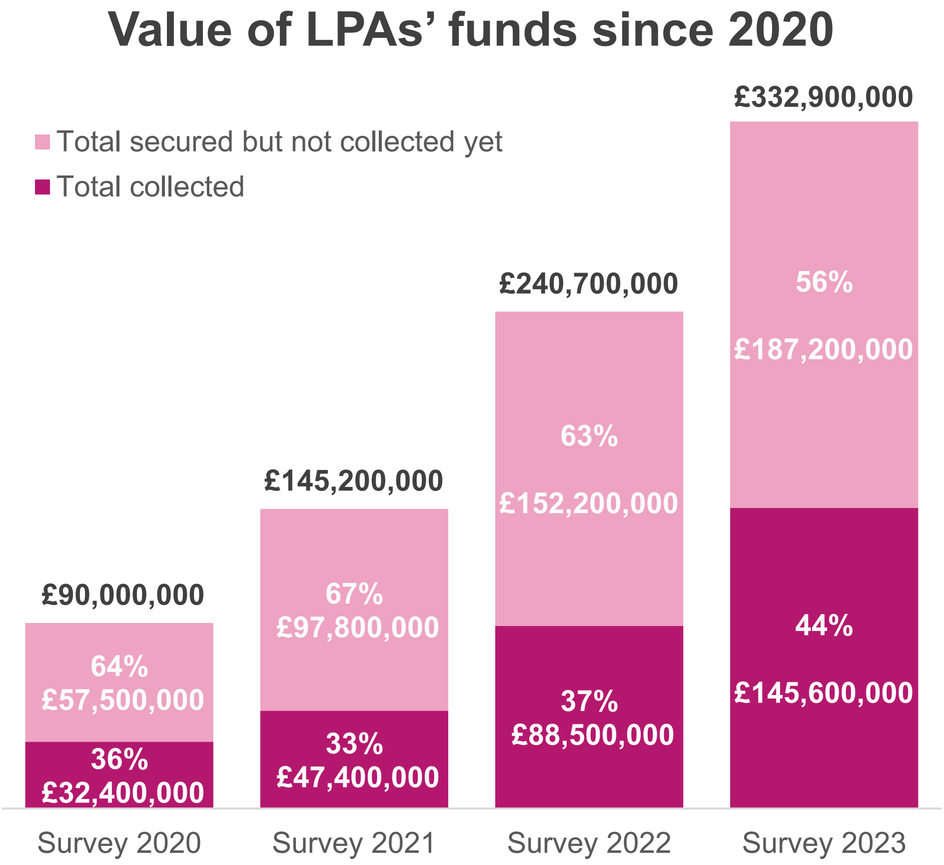
Growth in value of carbon offset funds

Of the £146 million collected by LPAs, £57 million was collected in the 2023 reporting period. In addition, LPAs also secured £35 million in legal agreements in this period.

Around 44 per cent of funds' value has been collected and is available to be spent by LPAs. This shows steady progress in securing and collecting carbon offset payments over the last few years.

This data represents the amounts collected since London's net zero carbon homes policy came into effect in 2016. As of 2021, the net zero carbon target also applied to major non-residential developments, and they are now making offset payments accordingly.

More funds are available for LPAs to spend on carbon saving projects – LPAs collected an additional £57 million in 2023.



Value of carbon offset funds by LPA

Local Planning Authority	Total amount collected[1]	Total amount secured by legal agreement[1]	Total value of fund	Proportion of fund collected
Barking & Dagenham	£772,000	£1,766,000	£2,539,000	30%
Barnet	£1,948,000	£6,915,000	£8,863,000	22%
Bexley	£420,000	£979,000	£1,399,000	30%
Brent	£4,190,000	£3,383,000	£7,573,000	55%
Bromley	£983,000	£3,700,000	£4,683,000	21%
Camden	£8,016,000	£4,030,000	£12,045,000	67%
City of London Corporation	£1,170,000	£20,933,000	£22,103,000	5%
Croydon	£4,501,000	£4,968,000	£9,468,000	48%
Ealing	£6,682,000	£14,422,000	£21,104,000	32%
Enfield	£600,000	£1,415,000	£2,014,000	30%
Greenwich	£2,440,000	£2,440,000	£4,880,000	50%
Hackney	£2,214,000	£4,449,000	£6,663,000	33%
Hammersmith & Fulham	£1,214,000	£2,784,000	£3,998,000	30%
Haringey	£2,526,000	£4,968,000	£7,494,000	34%
Harrow	£1,860,000	£1,067,000	£2,927,000	64%
Havering	£1,563,000	£1,472,000	£3,035,000	52%
Hillingdon	£8,107,000	No data	£8,107,000	No data
Hounslow	£3,961,000	£7,492,000	£11,452,000	35%
Islington	£17,600,000	£5,000,000	£22,600,000	78%
Kensington & Chelsea	£1,608,000	£1,589,000	£3,197,000	50%
Kingston	£1,125,000	£2,551,000	£3,676,000	31%
Lambeth	£1,985,000	£4,030,000	£6,015,000	33%
Lewisham[2]	£2,404,000	£0	£2,404,000	100%
London Legacy Development Corporation	£3,940,000	£1,946,000	£5,886,000	67%
Merton	£1,225,000	£1,910,000	£3,135,000	39%
Newham	£6,546,000	£5,686,000	£12,232,000	54%
Old Oak and Park Royal Development Corporation[2]	£8,099,000	£0	£8,099,000	100%
Redbridge	£363,000	£1,678,000	£2,041,000	18%
Richmond on Thames	£327,000	£1,145,000	£1,471,000	22%
Southwark	£8,289,000	£14,661,000	£22,951,000	36%
Sutton[3]	£126,000	£744,000	£870,000	14%
Tower Hamlets	£18,852,000	£37,202,000	£56,054,000	34%
Waltham Forest	£3,739,000	£10,115,000	£13,854,000	27%
Wandsworth	£2,022,000	£5,049,000	£7,071,000	29%
City of Westminster	£14,230,000	£6,722,000	£20,952,000	68%
Total	**£145,600,000**	**£187,200,000**	**£332,900,000**	**44%**

[1] Between 1/10/2016 and 31/07/2023, however some LPAs provided totals to 2024.
[2] Lewisham and OPDC both secured and collected offset payments concurrently.
[3] Sutton did not provide data for 2023, values in the table are taken from 2022 results.

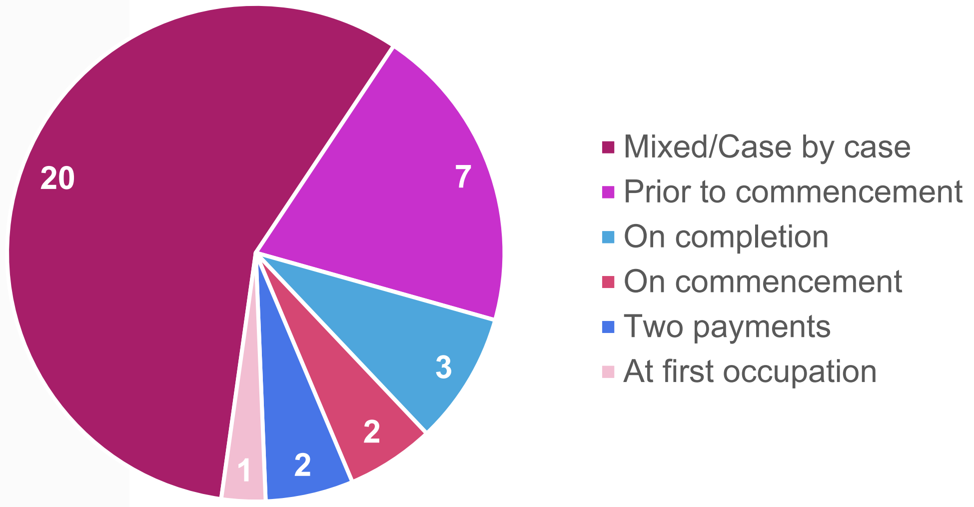
Collecting carbon offset payments

In 2023, the amount collected and available for spending is 44 per cent of the total value of the fund. This proportion is influenced by when LPAs determine and collect payments from developers as well as the development timeline:

- Most LPAs use different payment timings based on the size or staging of the development or other factors, often determined case-by-case. A small number of LPAs determine and collect payments on completion or at first occupation. Some LPAs determine and collect payments post-construction as an incentive for developers to improve on design stage calculations and pay a more accurate amount of offset.
- Developers have three years to commence construction following planning approval, resulting in a period between payments being secured and payments being made.

Carbon offset funds are secured through Section 106 agreements. Most LPAs trigger payment of carbon offset payments at different times in the development cycle.

When LPAs collect carbon offset payments



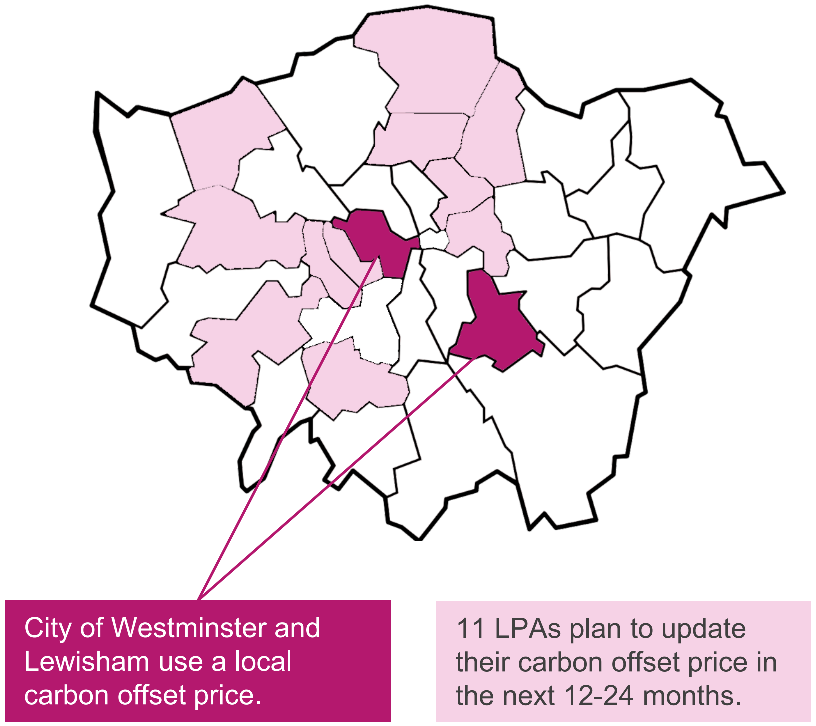
Carbon offset price

LPAs can develop, publish and keep under review their own carbon offset price based on the cost of offsetting carbon emissions locally, instead of using the GLA-recommended price.

Most LPAs reported using the latest GLA-recommended carbon offset price of £95/tonne, in line with the London Plan 2021. Two LPAs use a locally set price. 15 LPAs are investigating introducing a local carbon offset price, 11 of these plan to review and/or update their carbon offset price in the next 12-24 months.

LPAs' plans for carbon offset prices

LPAs with local carbon offset prices



Carbon offset fund spending

Total value of carbon offset funds spent or committed to spend since 2016: £44,500,000

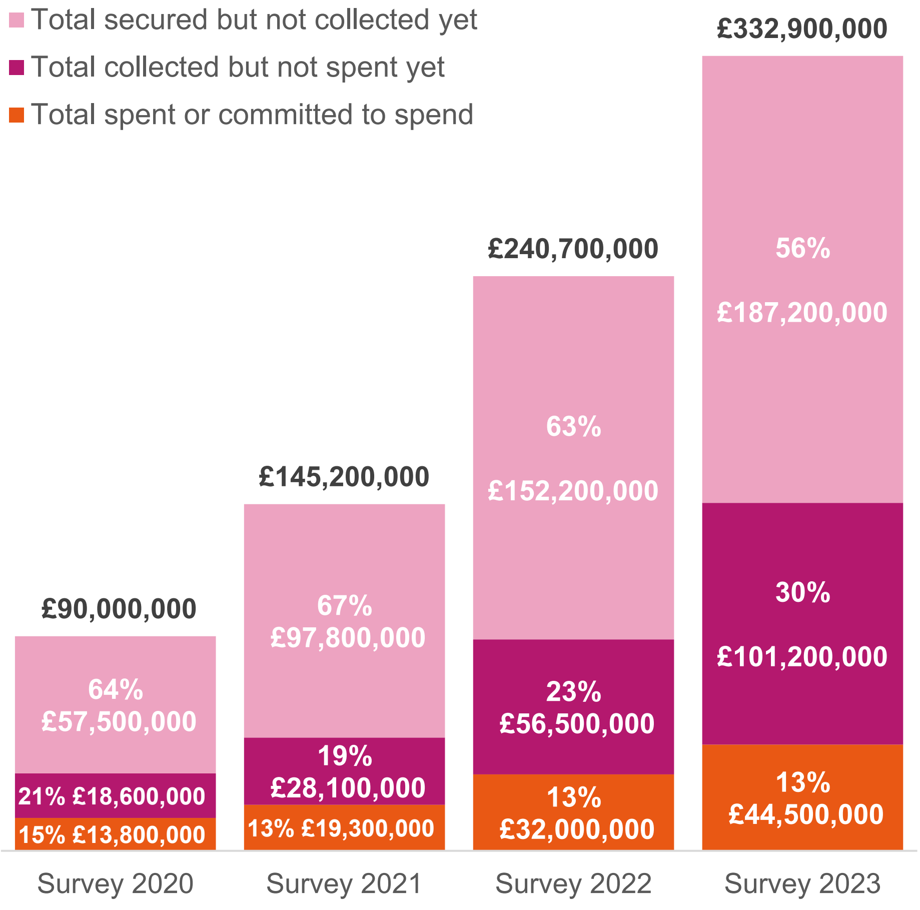
There has been good progress in spending carbon offset funds among LPAs with a 39 per cent increase from the previous year – around £12.5 million more spent or committed to spend than was reported in 2022. The amount spent or committed is 31 per cent of the total amount collected by LPAs and 13 per cent of the total value of funds (secured and collected).

An additional five LPAs reported spending their carbon offset funds compared to 2022, bringing the total to 31.

It is important that LPAs continue to identify and fund new projects to spend their offset funds, to help deliver the carbon reductions needed across London.

- LPAs should continue to co-fund projects with other funding sources and to use the guidance which includes information on how to identify projects, including investigating GLA programmes such as the Zero Carbon Accelerator for project development support.
- LPAs should consider strategic opportunities to pool funds to meet sub-regional or London-wide net zero carbon objectives.

Spending of funds since 2020



Breakdown of carbon offset fund spending

The table lists the amount of offset funds spent or committed to projects since 1 October 2016 and the proportion of the total fund spent or committed.

Positively, most of the four LPAs that had not spent offset funds during the reporting period stated they had commenced spending and committing funding after the reporting period.

Local Planning Authority	Total spent or committed[1]	Proportion of total fund spent or committed
Barking & Dagenham	£0	0%
Barnet	£286,000	3%
Bexley	£0	0%
Brent	£108,000	1%
Bromley	£127,000	3%
Camden	£502,000	4%
City of London Corporation	£656,000	3%
Croydon	£454,000	5%
Ealing[3]	£3,200,000	15%
Enfield	£440,000	22%
Greenwich	£55,000	1%
Hackney	£1,409,000[2]	21%
Hammersmith & Fulham	£125,000	3%
Haringey	£910,000[2]	12%
Harrow	£323,000	11%
Havering	£170,000	6%
Hillingdon	£470,000	6%
Hounslow	£145,000	1%
Islington	£12,000,000	53%

Local Planning Authority	Total spent or committed[1]	Proportion of total fund spent or committed
Kensington & Chelsea	£700,000[2]	22%
Kingston	£230,000	6%
Lambeth	£15,000	0%
Lewisham[3]	£251,000	10%
London Legacy Development Corporation	£326,000	6%
Merton	£179,000	6%
Newham	£126,000	1%
Old Oak and Park Royal Development Corporation	£5,430,000[2]	67%
Redbridge	£0	0%
Richmond on Thames	£152,000	10%
Southwark	£1,189,000	5%
Sutton[4]	£0	0%
Tower Hamlets	£10,344,000	18%
Waltham Forest	£2,398,000	17%
Wandsworth	£137,000	2%
City of Westminster	£1,616,000	8%
Total	**£44,500,000**	**13%**

[1] Between 1/10/2016 and 31/07/2023, however some LPA provided totals to 2024.
[2] Provided 'committed' figure rather than spend
[3] Reported a lower figure than 2022. (Lewisham due to project not progressing, Ealing not specified).
[4] Sutton did not provide data for 2023, values in the table are taken from 2022 results.

Challenges for LPAs in spending funds

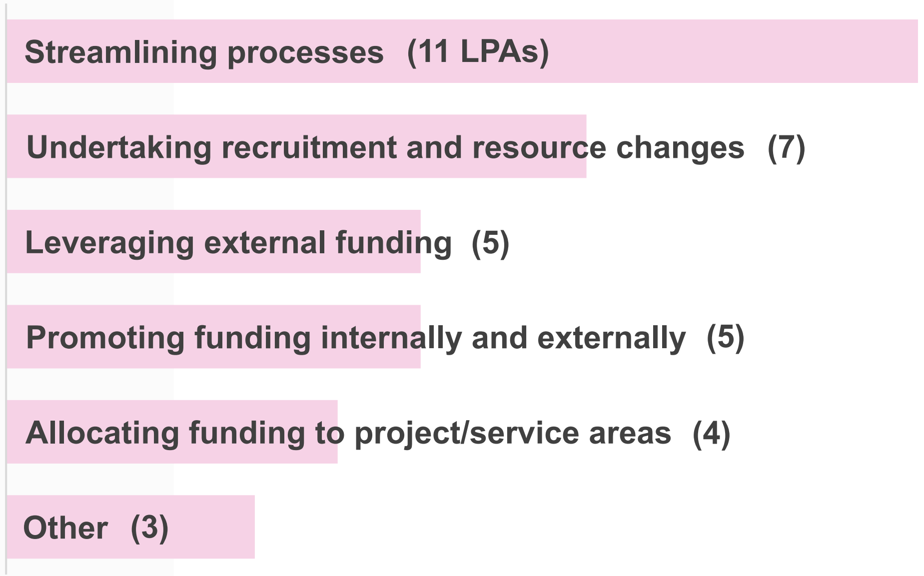
The 2023 survey has shown an improving amount of activity and progress made by LPAs to collect and spend offset funds.

However, **some LPAs reported facing challenges in spending funds**. These challenges included: the time, expertise and resource needed to develop and approve a pipeline of carbon savings projects; other resourcing constraints; not having sufficient funding available; as well as the time and cost to deliver carbon saving projects.

LPAs shared the many ways they were overcoming these challenges. This included: streamlining their processes for governance, approval, and applications; as well as undertaking resource changes or recruiting staff to administer funds and/or deliver carbon saving projects.

Five LPAs are **leveraging external funding** such as the Public Sector Decarbonisation Scheme. Five LPAs are **promoting the funds internally and externally** and others have **directly allocated the funding to projects**, work programmes or service areas for spending.

Ways LPAs are addressing spending challenges



LPAs are streamlining processes to ensure efficient spending and monitoring as well as consistency in decision making approaches.

Combining sources of funding

LPAs are encouraged to pair other sources of funding with their carbon offset funds to maximise their impact. **31 LPAs reported that they are supportive of co-funding** (up from 29 in 2022).

22 of these LPAs reported that they are already leveraging co-funding to deliver carbon saving projects (up from 17 in 2022). Several LPAs indicated that carbon offset funds are being combined with other LPA funds.

It is important that the additionality of projects can be demonstrated. **Additionality** is the principle that offset payments should be spent on projects that:

- would not have occurred without the offset funding
- would not have occurred under a business-as-usual scenario
- are not required to meet national legislation.

The guidance gives more information on demonstrating additionality.

Sources of co-funding and support

- Public Sector Decarbonisation Scheme (PSDS)
- Social Housing Decarbonisation Fund (SHDF)
- Mayor of London's Green Finance Fund (through the London Climate Finance Facility)
- Mayor's Low Carbon Accelerators (now Zero Carbon Accelerators)
- Future Neighbourhoods 2030
- LPA capital funds and internal budgets (e.g. public health)
- Other s106 funding
- Office for Zero Emission Vehicles (OZEV)
- Green Homes Grant and Local Authority Delivery Scheme
- GLA's Warmer Homes
- Go Ultra Low City Scheme (GULCS)
- Green Heat Network Fund
- DEFRA Air Quality Grant

Types of projects funded

More than 350 projects have been funded through LPAs' carbon offset funds.

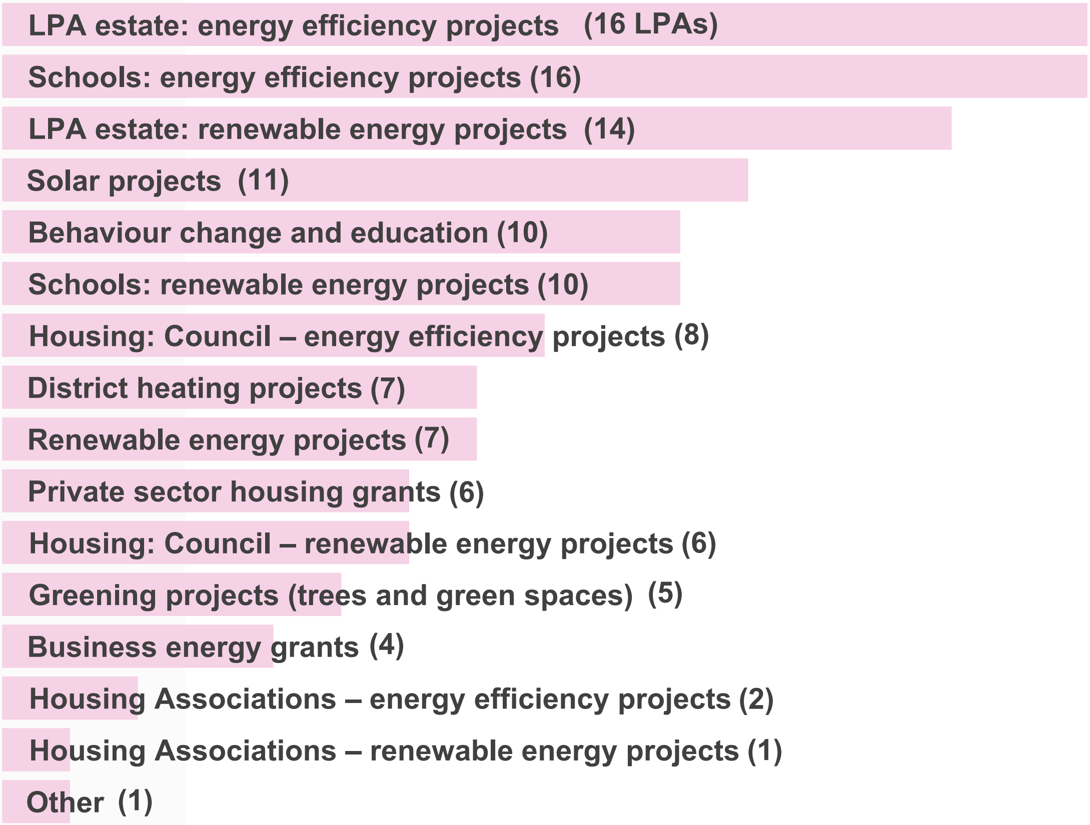
LPAs reported on the types of projects that have been, or will be, funded through their carbon offset funds. **The chart illustrates the main project categories which LPAs are funding**, showing how many LPAs said they were funding each type of project.

Energy efficiency and renewable energy projects continue to be the most common funded by LPAs, primarily in LPA corporate estates, housing and schools. Ten LPAs are funding behaviour change and education projects and seven are funding district heating projects.

GLA guidance recommends that funds are targeted towards energy efficiency, renewable energy and district heating projects, where solutions are readily available and commonly undertaken.

Projects with less tangible carbon savings (e.g. behaviour change), or improving resilience (e.g. tree planting, greening) can be funded but should not benefit from the majority of an LPA's fund.

LPAs are funding a range of projects



Case studies 1

Brent – Energy Efficient Social Housing

Brent's Housing team have opted to use £900,000 of their allocated carbon offset funding as match funding for a successful bid to the Social Housing Decarbonisation Fund.

This project was selected because the carbon offset funding was used to secure a further £1.3m in funding from central government, therefore meaning that the money could have a greater impact.

The project is also prioritising energy efficiency upgrades to some of Brent's poorest performing properties in terms of energy efficiency, helping with related issues such as fuel poverty and tenant wellbeing.

The anticipated carbon savings from the project are approximately 1,920 tCO_2e, assuming a 25 year project lifetime.

The project received £900,000 from Brent's Carbon Offset Fund.

London Legacy Development Corporation – Grow Studios in Hackney Wick

In October 2023, London Legacy Development Corporation (LLDC) awarded £86,724 to Grow Studios, a community arts and music venue in Hackney Wick, to install solar PV panels.

The project was selected not only because of the exceptional anticipated carbon savings, but also because of the co-benefits that the project will unlock.

Reduced energy costs will help to ensure the long-term sustainability of a grassroots music venue, which hosts over 200 events per year, and which provides artists' studios for 120 occupants.

The project's carbon savings are estimated to be 331.8 tCO_2e over 10 years.

The project received £87,000 from LLDC's Carbon Offset Fund.

Case studies 2

Wandsworth – Yvonne Carr Community Centre Air Source Heat Pump (ASHP)

Yvonne Carr is a community centre used by the local community in Nine Elms. The council launched a family hub at Yvonne Carr in September 2023, which has been designed to create holistic family support under one roof, so families get the right help to improve the lives of children.

The project involves replacing old gas boilers with a more efficient ASHP heating system, which will reduce carbon emissions and therefore support the process of decarbonisation.

The decarbonisation of the council's operational buildings portfolio is a key priority and supports the delivery of the Wandsworth Environment and Sustainability Strategy to meet the council's carbon reduction and net zero targets.

The anticipated annual savings are 0.61 tCO_2, with lifetime savings at around 6.71 tCO_2.

The project received £101,000 from Wandsworth's Carbon Offset Fund.

Harrow – Grange Primary School Retrofit

Harrow's Carbon Offset Fund has been used to match fund a grant received from the Public Sector Decarbonisation Scheme for a comprehensive retrofit project at Grange Primary School.

The project involves improving the energy efficiency of the school through a number of measures, including installing roof insulation and external wall insulation, and providing a new low carbon heating solution in the form of heat pumps, replacing the current old and inefficient gas boilers.

The carbon savings are estimated to be 3 tCO_2e for the project lifetime.

The project is anticipated to receive £215,000 in match funding from Harrow's Carbon Offset Fund.

Governance arrangements

Most LPAs are making use of existing processes to manage their offset funds e.g. Section 106 monitoring and reporting processes.

33 LPAs reported that governance arrangements are in place (up from 30 in 2022). These LPAs have regular meetings and other supporting governance procedures in place to oversee their carbon offset funds. Some examples are presented opposite.

The remaining LPAs reported that governance arrangements had not been established yet, pending an appropriate amount of funding being reached, to make it cost-effective to run.

Adequate governance arrangements should guide the delivery of carbon offset funds. LPAs should either establish a dedicated carbon offset fund or administer the funds through their Section 106 processes. The funds should be ring-fenced for the sole purpose of delivering carbon reduction projects.

Processes to manage funds

For grants available to **Camden** residents, businesses, and community groups, the Camden Climate Fund eligibility criteria determines which projects will be funded with final approvals made by the Climate Programme Manager and the Head of Climate. For internal projects (such as corporate energy efficiency projects) a business case is prepared and approved by the relevant Director.

At **Croydon**, all S106 funding (including carbon offset funds) is managed and approved by the internal Infrastructure Finance Group (IFG) which meets monthly. Applicants wishing to bid for carbon offset funds complete a business case and a standard application form which is then considered/approved by the IFG. For any project more than £100k, the submission needs to be approved by the council's Capital Board (which also meets monthly).

Project auditing

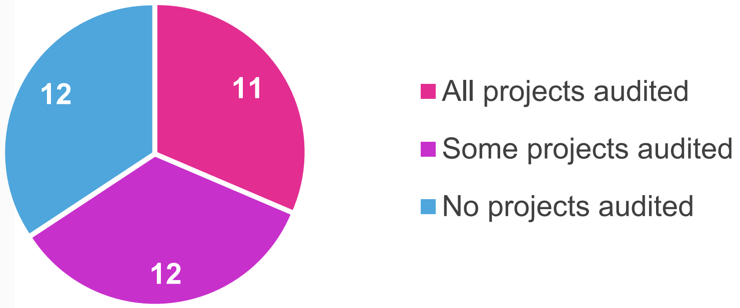
Most LPAs are auditing all or some of their funded projects to confirm carbon savings.

All offset projects must be able to demonstrate that they will save carbon before they are funded and that these savings will occur post-delivery. Most LPAs are auditing projects to ensure that carbon savings have occurred:

- **23 LPAs confirmed that carbon savings will be verified post-installation** for all or some projects. Monitoring and evaluation requirements are often contained in funding agreements.

- **12 LPAs do not currently have or require an auditing process**, with nine of these LPAs working to establish them. These LPAs raised that auditing arrangements are not in place as auditing has not been required yet, only small-scale projects and small amounts of funding have been granted, and the LPA has insufficient resources.

LPA's project auditing arrangements



Carbon savings should be verified post-installation through monitoring and evaluation. Project monitoring plans should be prepared for each project funded, requiring a final report detailing the work carried out and estimated resulting carbon savings to be achieved over the lifetime of the project.

If auditing arrangements are not already in place, LPAs should work with other LPAs and London Councils to learn more about how best to implement this. For example, using LPA climate plan auditing processes.

Conclusions and recommendations

Conclusions

Collecting and spending carbon offset funds is steadily increasing.

The carbon offset funds collected by LPAs increased by 65 per cent from 2022. In 2023, this is equal to 44 per cent of the funds' value, with the remaining 56 per cent secured in legal agreements. In the same period, the amount spent or committed to spend has increased 40 per cent.

Energy efficiency and renewable energy continue to be the focus.

More than £44m has been spent or allocated to more than 350 carbon saving projects. LPAs are most frequently funding energy projects in their estate and local schools, while close to a third of LPAs are funding behaviour change and education projects.

Match funding is becoming standard practice.

21 LPAs are using carbon offset funds to top up and match fund external and internal funding. An additional 10 are supportive of co-funding to catalyse carbon saving activity.

Approaches to measuring and verifying carbon savings from projects are variable.

For the LPAs with monitoring and auditing processes, their use is often determined at the discretion of the LPA based on the size of funding allocated, the type of project funded and the resources available. There is also variability in how LPAs estimate carbon savings in project proposals.

Governance and administrative processes are being streamlined.

Nearly all LPAs have governance and administrative arrangements in place. Some of these are streamlining processes to more efficiently deliver carbon saving projects and funding. A small number are looking to establish these as more funding becomes available.

Recommendations

The planning system is a key lever to deliver London's net zero carbon by 2030 target. Results from the 2023 survey show great progress amongst London's LPAs but some are facing similar challenges to last year in administering their carbon offset funds and delivering carbon saving projects.

Continue to ensure the London Plan 35 per cent carbon reduction target beyond Building Regulations is met, following the energy hierarchy, to maximise on-site reductions before calculating offset payments.

Consistently collect offset payments for all relevant planning applications.

Investigate opportunities to pool funds with other sources, and particularly with other LPAs, which London Councils should help facilitate.

Maintain and ensure suitable governance arrangements are in place to manage funds. Using existing processes is an efficient way to manage offset fund decision-making and can prevent delays to approving projects.

Use funds to overcome resource barriers. This will help in identifying cost-effective projects and co-funding opportunities.

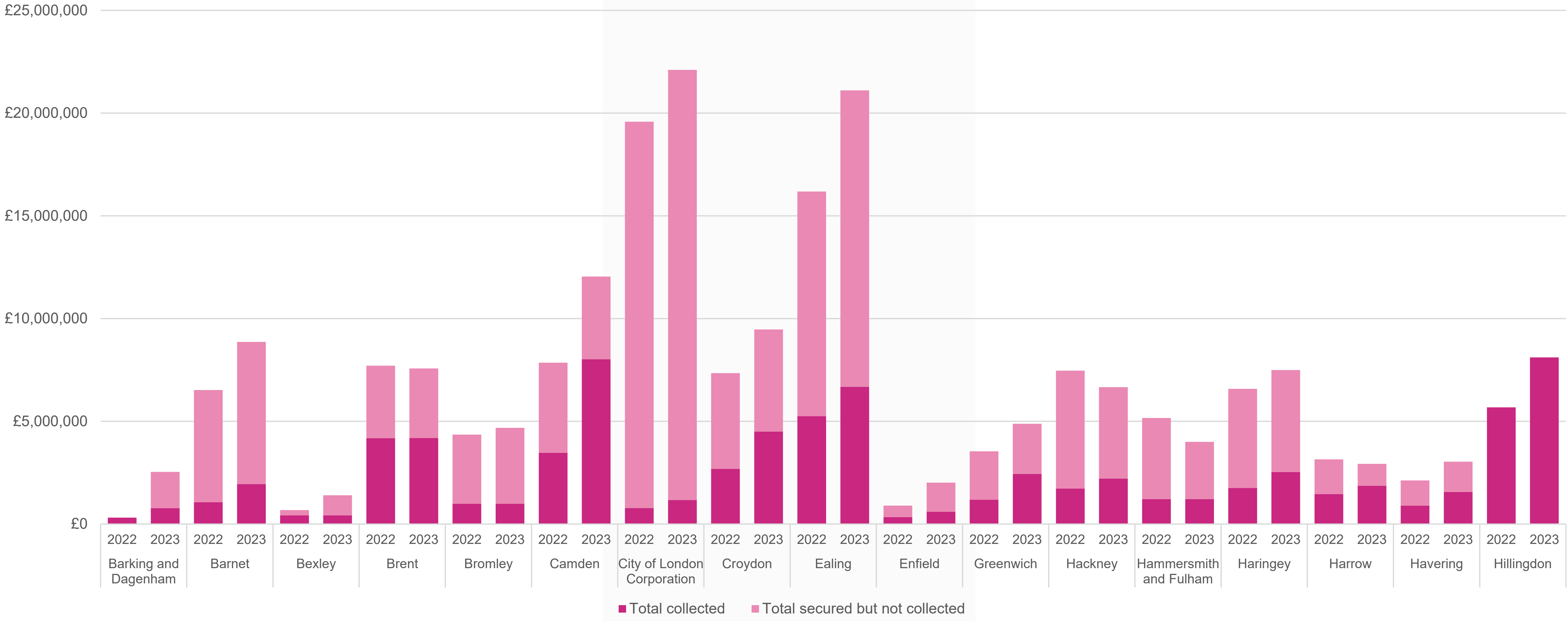
Continue to accurately and comprehensively monitor the operation of offset funds and report annually to the GLA.

Verify carbon savings post-installation through monitoring and evaluation. If auditing arrangements are not already in place, we recommend working with other LPAs to learn more about how best to measure carbon savings.

Target funds towards energy efficiency, renewable energy, district heating and climate resilience. This will help reduce the cost of living and help support schools and public institutions.

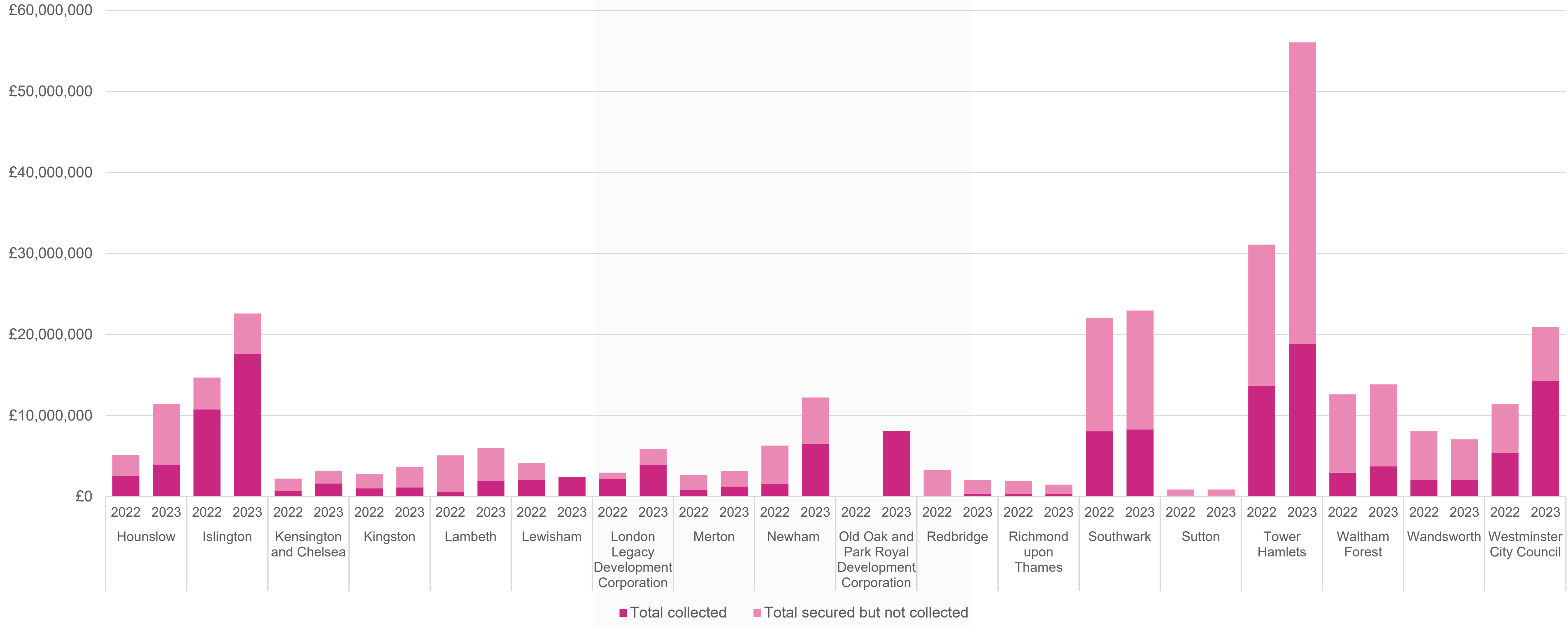
Align offset fund expenditure with priorities set out in climate action plans. As funds grow, LPAs will have greater ability to fund carbon saving projects to help tackle the climate emergency.

Appendix
Breakdown of carbon offset funds by LPA (1)



* A small number of LPAs confirmed errors in 2022 reporting leading to a small discrepancy between the figures in the 2022 report.

Appendix
Breakdown of carbon offset funds by LPA (2)



* A small number of LPAs confirmed errors in 2022 reporting leading to a small discrepancy between the figures reported in 2022.