



Driver & Vehicle Licensing Agency Report for Environment (Wales) Act 2016 Schedule 6 Duty – the biodiversity and resilience of ecosystems duty

1. Introduction and context

- 1.1. The Driver & Vehicle Licensing Agency (DVLA) is an executive agency of the Department for Transport (DfT), with sites in Swansea and Birmingham, and employs over 6,000 staff. We hold more than 50 million driver records and over 40 million vehicle records across the UK.
- 1.2. Our estate consists of three sites in the Swansea area, covering around 63,700m². Most of our staff are based at our Morriston site, with around 1000 staff working at our print, contact centre and training facilities. We also rent office space in Birmingham for under 200 staff, however, this site is not applicable to this report.
- 1.3. Sustainability and enhancing biodiversity are at the heart of what we do at the agency. This is outlined in our [Corporate Environmental Policy](#), which is signed by the Chief Executive, and explains our intentions:

“DVLA is committed to protecting our environment, preventing pollution, and continually improving our environmental performance. Our policy is to continually improve our environmental performance by... protecting and enhancing our estate’s biodiversity and ecosystems.”

- 1.4. Although DVLA’s primary function is not directly related to nature recovery and land management, the way we manage our estate can have a positive impact on the environment. We have outlined a number of goals and targets, so that we can continue to make a positive difference to the biodiversity on and around our estates.

2. Setting a baseline

- 2.1. A preliminary ecological appraisal was conducted on 13 July and 21 July 2019, by the Senior Sustainability and Travel Services Manager (STSM), with the assistance of an ecologist with 20 years of experience and who is a chartered member of the Chartered Institute of Ecology and Environmental Management (CIEEM). A list of plant species was compiled, with relative plant species abundance estimated using the DAFOR scale. Indicative habitats identified at DVLA are listed in Table A.
- 2.2. Surveys have been conducted across the estate to determine the presence of any protected and notable species. From May 2018 to October 2019 the following surveys were conducted:
 - a bat survey
 - a herpetofauna survey
 - a tree survey (conducted at our main site)
- 2.3. Specific actions have been assigned to individual species only when their needs are beyond the means of the actions outlined in the agency’s Habitat Management Plans.

Table A

| Habitat Type | Environment (Wales) Act s.7 priority habitat | Morriston – main site | Industrial site |
|----------------------------------|--|-----------------------|-----------------|
| Dense Scrub | Lowland heathland | ✓ | ✓ |
| Parkland/scattered trees mixed | Wood pasture and parkland | ✓ | ✓ |
| Neutral semi-improved grassland | Lowland meadows | ✓ | ✓ |
| Amenity grassland | No | ✓ | ✓ |
| Introduced shrub | No | ✓ | ✓ |
| Species poor intact hedgerow | Hedgerows | ✓ | ✓ |
| Species poor hedgerow with trees | Hedgerows | ✓ | |
| Tall ruderal | Lowland heathland | | ✓ |
| Mesotrophic standing water | Ponds | | ✓ |
| Dry ditch | No | | ✓ |

Table A shows the results of the Phase 1 habitat survey. It also indicates whether each habitat is protected under section 7 of the Environment (Wales) Act.

Table B

| Species | s.7 Species | Morriston – main site | Industrial site |
|---|-------------|-----------------------|-----------------|
| Bats: | | | |
| Noctule (<i>Nyctalus noctule</i>) | ✓ | ✓ | ✓ |
| Leisler's (<i>Nycatalus</i>) | ✓ | ✓ | ✓ |
| Common pipistrelle (<i>Pipistrellus pipistrellus</i>) | ✓ | ✓ | ✓ |
| Nathusius' Pipistrelle (<i>Pipistrellus Nathusii</i>) | ✓ | ✓ | ✓ |
| Soprano Pipistrelle (<i>Pipistrellus Pygmaeus</i>) | ✓ | ✓ | |
| Brown long-eared bat (<i>Piecotus auratus</i>) | ✓ | ✓ | |
| Honey Bees | | | ✓ |
| Common Lizards (<i>Zootoca vivipara</i>) | ✓ | | ✓ |
| Wood vetch (<i>Vicia sylvatica</i>) | | ✓ | |
| Betony (<i>Stachys Offcinalis</i>) | | ✓ | |
| Japanese Knotweed (<i>Reynoutria japonica</i>) | | ✓ | |
| Montibretia (<i>Crocoshmia x Crocosmiiflora</i>) | | ✓ | |
| Rhondodendron (<i>Rhododendron Ponticum</i>) | | | ✓ |
| Cotoneaster (<i>Cotoneaster sp.</i>) | | | ✓ |

Table B shows the results of various species surveys. It also indicates whether each habitat is protected under section 7 of the Environment (Wales) Act.



3. Governance

- 3.1. It is the responsibility of the Senior Sustainability and Travel Services Manager (STSM) to ensure that the agency meets its section 6 reporting requirements. The **last report** was submitted in 2019. Our **Biodiversity Action Plan (BAP)** factors in section 6 requirements, removing the need for a specific section 6 plan.
- 3.2. Our 2020 to 2025 BAP was published in November 2020 as a framework to deliver tangible enhancements to biodiversity existing within the boundaries of DVLA's sites across Swansea. The STSM is the author of the BAP and is responsible for ensuring the objectives of the plan are met.
- 3.3. **The aims of our BAP are as follows:**
 - 3.3.1. ensure that the habitat and species' targets from section 7 of the Environment (Wales) Act 2016, Greening Government Commitments 2020 to 2025, and Swansea local BAP are translated into effective action on the estate
 - 3.3.2. identify targets for other habitats and species of local importance on our estate
 - 3.3.3. develop effective partnerships with staff and the local community to ensure that programs for biodiversity conservation are maintained in the future
 - 3.3.4. raise awareness internally and locally of the need for biodiversity conservation and provide guidance on biodiversity
 - 3.3.5. ensure that opportunities for conservation and enhancement of biodiversity are fully considered throughout our operations
 - 3.3.6. monitor and report on progress in biodiversity conservation to a standard suitable for attaining a biodiversity award

4. Highlights, key outcomes and issues

4.1. Highlights

- 4.1.1. For the last two years, DVLA has participated in 'No Mow May', which allows areas of grassland around the estate to flourish over the month of May. Our participation in 'No Mow May' has been promoted to staff across the agency through an internal communications strategy that explains the benefits of wildflowers, encourages staff to enjoy the green areas across the estate, and gives staff the opportunity to showcase their own wildflower gardens. Every year, staff are becoming more engaged and invested in our biodiversity and conservation targets, with a keen desire to see a more permanent change to how the estate is managed moving forward.
- 4.1.2. We continue to maintain a beehive at our Industrial Site. The bee population benefit from the wildflowers around the site, but also promote local flora by increasing the likelihood of pollination. The hive itself is maintained by volunteers and is relatively self-sufficient as the honey is not collected.
- 4.1.3. Security have been trained on how to help any injured wildlife that is found on the agency's estate. This includes information on what measures should be taken to protect staff and the wildlife. They have also been given a list of organisations, including the nearest vet, to allow them to get the help required. Security are aware that they need to contact DEFRA if any protected or dead animal species are found at any of our sites.



4.2. Key outcomes

- 4.2.1. Evaluation of biodiversity currently present on the agency's estate provides a baseline for a comprehensive action plan which has been created and published. This forms the framework that allows the agency to focus its resources to promote and protect biodiversity across its estate, and the wider community.
- 4.2.2. An exercise is being undertaken to reduce both the amount of mowing and pesticide use across the estate. The proposal is to mow the estate less frequently, removing arisings to limit nutrients in the soil. This will reduce the growth of more robust grasses and plants to promote wildflower development by limiting competition, which generally leads to cost savings. Prioritising biodiversity is often more cost-effective than a vigorous maintenance regime.
- 4.2.3. The Sustainability team continues to grow, with the hiring of an Environment and Sustainability Manager, who is responsible for actioning the BAP and engaging staff across the agency. This extra resource allows DVLA to give biodiversity and sustainability the attention it deserves.

4.3. Issues

- 4.3.1. The agency's grounds are managed through a private finance initiative (PFI) contract, which places it under the responsibility of the PFI contractor, Telereal Trillium (TT). TT use the subcontractor, Countrywide, who maintain the grounds according to the specification in the PFI contract.
- 4.3.2. Due to the nature of the PFI contract, there are specific requirements placed on the maintenance of the DVLA estate's grounds. These requirements focus on aesthetics, such as well-maintained lawns and hedgerows. This limits the potential for wildflower growth and increased biodiversity on the estate.

- 4.3.3. From 17 to 18 February, Storm Eunice toppled three trees at the Morriston site, representing the largest loss to biodiversity in the reporting period. A tree survey was conducted in June 2022 to assess the health of remaining trees. DVLA has an ongoing inspection regime to fulfil its obligations under the Occupiers Liability Act 1957 and 1984 and maintain biodiversity.

5. NRAP Objective 1: Engage and support participation and understanding to embed biodiversity throughout decision making at all levels

- 5.1. The agency's Business Plan for 2022-2023 explicitly states it will "carry out work to improve the sustainability of/or reduce the environmental impacts of our operational estate and travel". It highlights that improving the biodiversity of the estate will be a key contributor to achieving the business plan goal.
- 5.2. The agency has a Sustainability Communications Strategy that plans out communications in various forms, ranging from podcasts to collaborative events with stakeholders. The aim of the strategy is to ensure that all members of staff are kept up to date with all environmental issues and events, including biodiversity. Some examples of communications include:
 - a COP27 podcast summarising the event
 - No Mow May article highlighting the benefits of wildflowers, with images of wildflower meadows allowed to flourish on the estate
 - an article reviewing the BAP and its importance to the DVLA and environment

This variety of communications is designed to reach the greatest number of staff as possible, delivering information that highlights the importance of biodiversity, and the value it adds to the agency.



6. NRAP Objective 2: Safeguard species and habitats of principal importance and improve their management

- 6.1. The BAP identifies what species and habitats listed on the section 7 biodiversity lists have been found on the agency's estate. To meet the requirements of the Environment (Wales) Act, specific habitat management plans have been put in place. The list of habitats and species can be found under 'Setting a Baseline' in this report.
- 6.2. The agency maintains a beehive on its Industrial Site. Over the course of the COVID-19 pandemic, the hive has fallen into disrepair due to lack of maintenance and multiple storms, damaging the hive's structure. To remedy this, DVLA is making a member of staff responsible for the maintenance and care of the hive. They will receive appropriate training and equipment, and form an inspection schedule, to maintain the hive and its population. The objective of the hive is not to farm honey, but instead to promote biodiversity on site, especially wildflowers that will benefit from having pollinators nearby.
- 6.3. Nature Recovery is managed through the agency's Environmental Management System. There is a schedule of auditing in place that includes an audit of the agency's progress against biodiversity and nature recovery objectives. The scope includes what has been achieved, any issues or challenges and what actions are planned to achieve progress.

7. NRAP Objective 3: Increase the resilience of our natural environment by restoring degraded habitats and habitat creation.

- 7.1. Most of the agency's estate is urban. However, the green areas that are present on the estate already contain a variety of habitats and species, the majority of which are protected under section 7 of the Environment (Wales) Act. This is an opportunity for DVLA to make a difference in the resilience of the natural environment through protecting these habitats and creating new ones.

Below you will find examples of actions the agency has taken in the last three years to achieve this.

- 7.1.1. Work has been conducted on the freshwater pond at the industrial unit site, to restore and protect this habitat. From November to December 2021, the pond was cleared of around a third of its vegetation. The pond is now monitored to prevent encroachment of vegetation, choking the habitat. Every year, on rotation, the pond will be cleaned of another third of its vegetation.

To limit algae growth on the pond, the introduction of barley straw has been introduced to the pond and will continue to be periodically. This will naturally limit the build-up of algae on the pond, helping to maintain the health of the habitat. This is also an example of biological control without the use of algaecides, providing a more economical solution, without introducing chemicals into the ecosystem.
- 7.1.2. The agency has several hedgerows across its estate used by birds and small mammals to feed and nest. No hedges should be trimmed between the months of March to August. If hedge trimming is required a walkover survey is made to ensure there are no nesting birds. If birds are found building or using a nest that section of hedge is not cut until later in the year when nesting is no longer active.
- 7.1.3. A new native hedgerow has been planted on the Morryston estate. It consists of buckthorn, blackthorn, dog rose and guelder rose, all of which are native to the area. Once the hedgerow is fully grown, it will provide a place for birds to nest, and hibernation sites for local flora and fauna.



8. NRAP Objective 4: Tackle key pressures on species and habitats

- 8.1. The agency has a Japanese knotweed management plan in place to monitor and treat populations of this invasive species across the estate. Throughout 2021 to 2022, no new areas of Japanese knotweed were identified. All known locations containing Japanese knotweed showed signs of decline, with some areas showing no signs at all. This highlights the effectiveness of the management plan and its execution.
- 8.2. Herbicide and pesticide use is monitored by TT and Countrywide to ensure that only a minimal amount of these substances are used across the site.
- 8.3. The agency has a 14001:2015 accredited Environmental Management System (EMS), that allows the Sustainability team to monitor, measure and reduce the agency's impact on the environment. The Greening Government Commitments place stringent environmental targets on the agency, ranging from reducing total carbon emissions, to the amount of paper we use.
- 8.4. From 2019 to 2020, the agency has seen a reduction in its environmental impact, which reduces its impact on the local environment, tackling a key pressure on local species and habitats. One of the most important changes has been the reduction in water consumption, which is in line with the agency's Waterwise Accreditation, achieved in the reporting year, 2021 to 2022. This accreditation provides an external assurance of the efforts and undertakings the agency is making to limit its water use.
- 8.5. DVLA must ensure it meets the minimum mandatory Government Buying Standards (GBS) when buying goods and services. This forms part of the government's public sustainable procurement. The objective is for DVLA to meet its needs for goods, service, works and utilities in a way that benefits not only the organisation, but also society and the economy, while minimising damage to the environment.
- 8.6. On the next page you will find a summary of key standards DVLA complies with, highlighting its focus on mitigating the damage that our estate and operations have on the environment. Please note, the summary does not cover all the Government Buying Standards, which can be found [here](#).

Table C

| | 2019/2020 | 2020/2021 | 2021/2022 |
|--|-----------|-----------|-----------|
| Total Carbon Emissions (CO ₂ e) | 7,977 | 6,318 | 6,237 |
| Water Consumption (m ³) | 52,865 | 34,587 | 36,413 |
| Total Waste (Tonnes) | 1,120 | 771 | 907 |
| Waste to Landfill (%) | 0.8% | 1.40% | 0.83% |

Table C shows the year-on-year comparisons of the agency's environmental performance.



Table D

| | |
|--|---|
| <p>Envelopes</p> | <p>Must have 100% recycled content for general use.</p> <p>Must have 60% recycled content for mailing system use. Of the non-recycled contents (40% or less), any virgin pulp used must be purchased in accordance with UK timber procurement policy.</p> <p>Only timber and timber products originating either from independently verified legal and sustainable sources or from a licensed Forest Law Enforcement Governance and Trade (FLEGT) partner can be purchased.</p> |
| <p>Paper</p> | <p>The recycling process must be Elemental Chlorine Free (ECF), with Adsorbable Organic Halogenated compound (AOX) emissions from the production of each pulp used below 0.25kg per Air Dried Tonne (ADT) or Process Chlorine Free (PCF).</p> <p>Copying and graphic paper must have 100% recycled content, to include only genuine recovered fibre (i.e., no 'mill broke' unless solely from a recycled paper production line), in accordance with NAPM definition.</p> <p>Tissue paper (for example, kitchen and toilet tissue and hand towels) must have 100% recycled content, to include only genuine recovered fibre.</p> |
| <p>Food and catering services</p> | <p>At least 10% of the total monetary value of primary commodity (that is, raw ingredient) food and drink procured shall be inspected and certified to:</p> <ul style="list-style-type: none"> publicly available Integrated Production (IP) or Integrated Farm Management (IFM) standards publicly available organic standards compliant with European Council Regulation 834/2007 <p>All palm (including palm oil and products derived from palm oil) used for cooking and as an ingredient in food must be sustainably produced.</p> <p>All fish are demonstrably sustainable with all wild caught fish meeting the Food and Agriculture Organisation Code of Conduct for Responsible Fisheries (this includes Marine Stewardship Council certification and Marine Conservation Society 'fish to eat', or equivalent).</p> |
| <p>Textiles</p> | <p>Bidders must indicate the proportion of cotton or other natural fibres used in the final product by weight deriving from organic production. The supplier must provide evidence of the origin of the fibres used and the organic nature of their production, such as the EU organic logo or approved national logos for organic production.</p> <p>Bidders should indicate how they have applied life cycle thinking to select fibres and materials that have the lowest environmental impact over the whole life of their product. The supplier must provide evidence of the benefit compared with a realistic alternative fibre over its lifetime, as justified by independent studies (for example, life cycle assessment).</p> <p>Bidders must indicate the proportion of the product by weight made of recycled fibres, for example fibres originating only from cuttings from textile and clothing manufacturers or from post-consumer waste (textile or otherwise).</p> |

Table D is a summary of key government buying standards DVLA complies with.

9. NRAP Objective 5: Improve our evidence, understanding and monitoring

9.1. The surveys that were conducted to create the baseline of the BAP 2020 to 2025 will be conducted again in 2024. The purpose of this is to track the effects that the BAP and individual HAPs and SAPs have had on the populations of section 7 species and habitats across the estate.

9.2. The data gathered from these surveys will serve as a bank of evidence that fills in gaps that have existed previously. This will allow the Sustainability team to engage with stakeholders in biodiversity across the estate and use this evidence to support the implementation of future biodiversity initiatives.

10. NRAP Objective 6: Put in place a framework of governance and support for delivery.

- 10.1. A Biodiversity Steering Group has been established which consists of senior management from stakeholder departments. The group holds regular meetings to discuss progress towards achievement of the BAP goals and any issues or opportunities that have presented themselves. The group also works to embed biodiversity throughout decision making across the business.
- 10.2. The STSM is a qualified ecologist with over 15 years of experience. This illustrates that ecological expertise can be drawn upon without the need to seek external consultation. This means the Sustainability team has the expertise available to ensure that nature recovery is at the heart of the agency's environmental strategy.
- 10.3. The sustainability communication strategy continues to be expanded to deliver information in a more dynamic way. The use of audio communications, in the form of podcasts, allows people to engage with environmental communications in a varied way. With more people aware of the importance of protecting and promoting biodiversity, collaboration continues to improve and will be paramount in achieving the goals set out in the agency's BAP.
- 10.4. DVLA continues to be an active member of Swansea's Local Nature Partnership, engaging with other organisations in the Swansea area to promote biodiversity and nature recovery. Recently the agency helped refine the Swansea Local Nature Recovery Action Plan by providing feedback on stated goals.
- 10.5. The agency's Sustainability Team has expanded in recent months, hiring a Sustainability and Environment Manager and Sustainable Procurement Manager. These roles grant the capacity to give nature recovery, waste, and sustainable procurement the time it deserves. It ensures that the agency takes a life-cycle approach to its activities, embedding sustainability from the purchasing of goods and services to the end of their life.

11. Next steps

- 11.1. With the conclusion of the agency's PFI contracts by 2025, the agency is in a good place to transform its estate to ensure the protection and promotion of biodiversity. Sustainability is present throughout the scope of the hard and soft services specifications, ensuring that potential contractors enable DVLA to achieve its environmental goals and objectives, including those set out in the [BAP](#).
- 11.2. The industrial unit site is given specific attention, with a beehive being repaired with native pollinator friendly species planted to create a habitat rich in biodiversity. As this site is not open to the public there is greater scope for ecological work to take place. This includes the implementation of mosaic habitats to promote progression and achieve the maximum amount of biodiversity.
- 11.3. In 2024, the BAP will be reviewed. As part of this process DVLA will investigate the progress that has been made, through analysing the results of all ecological surveys. This information will then inform the next BAP, which will cover the period 2025 to 2030. This plan will also consider any compliance obligations or government targets, including those stated in the GGCs.

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