# BURNLEY CLIMATE CHANGE STRATEGY

2022 - 2026



# CONTENTS

# **CONTENTS**

1. Introduction - Climate Emergency Declaration	3
2. The established causes	
& effects of Climate Change	4
- Greenhouse Gases	4
3. National and Local Policy	6
- Emissions Targets	6
- Renewable Energy Targets	6
- Petrol and Diesel Vehicles	6
- Building Regulations	6
- National Planning Policy	7
- Burnley's Local Plan	7
- Planning Reform	8
4. The Scope of the Strategy	9
- Burnley Council's Role	9
<ul> <li>Working with Lancashire County Council (LCC)</li> </ul>	9
- Working with other key partners	9

<b>5</b> .	The Themes	10
	- Theme 1 - Vehicle Emissions	11
	- Theme 2 - Emissions from the use and occupation of buildings	14
	- Theme 3 - Emissions from the use and manufacture of products & materials	15
	- Theme 4 - Renewable energy	17
	- Theme 5 – Enhancing the natural environment	18
	- Theme 6 - Flood Risk	19
	- Theme 7 – Communication and Stakeholder Engagement	20
5.	The Action Plan	21
7.	References & End notes	36

# 1. Introduction

#### **Climate Emergency Declaration**

- 1.1 In July 2019 Burnley Council declared a climate emergency. The Council had recognised and sought to address the issue of climate change through a number of its previous plans and strategies, but in declaring a climate emergency the Council sought to highlight the importance and urgency of this issue and ensure it is doing everything practically possible to limit Burnley's contribution to global climate change and adapt to its effects.
- 1.2 This strategy summarises the Council's commitment to addressing the climate emergency and concentrates on what the Council can and is doing to help address the issue.
- 1.3 Climate change is wide ranging in its causes and effects and cannot be fully addressed in a single strategy. The Council's overall approach to tackling this issue is to incorporate it into each department's work programme and policies with each of the Council's portfolio holders having a responsibility for addressing climate change through the Council's work programmes.

- 1.4 To be effective this strategy needs to be realistic and deliverable. It must also be able to adapt to a changing landscape that could include new evidence of the causes and effects, advances in technology, shifts in national policy and economic and social change.
- 1.5 This Strategy seeks to identify and maximise the Council's efforts in areas that are within its control both in terms of minimising impacts and ensuring the borough is resilient to the effects of climate change. It also sets out the work the Council can do through its partnerships and the influence it can have as a community champion.

# 2. The established causes & effects of Climate Change

- 2.1 'Climate Change' refers to global warming driven by human-induced emissions of greenhouse gases and the resulting large-scale shifts in weather patterns.
- 2.2 The effects of rising global temperatures include rising sea levels, increased flooding, coastal erosion, heat waves and droughts, increased adverse weather conditions and storms; all of which can have a catastrophic effect on human and animal life.

#### **Greenhouse Gases**

2.3 The largest driver of global warming is the emission of greenhouse gases (gases that trap heat in the atmosphere).

Carbon dioxide (CO2): enters the atmosphere through burning fossil fuels (coal, natural gas, and oil), solid waste, trees and other biological materials, and also as a result of certain chemical reactions. Carbon dioxide is removed from the atmosphere when it is absorbed by plants as part of the biological carbon cycle.

Methane (CH4): is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from livestock and other agricultural practices, land use and by the decay of organic waste in solid waste landfills.

Nitrous oxide (N2O): is emitted during agricultural, land use, industrial activities, combustion of fossil fuels and solid waste, as well as during the treatment of wastewater.

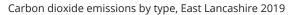
Fluorinated gases: are synthetic, powerful greenhouse gases that are emitted from a variety of industrial processes.

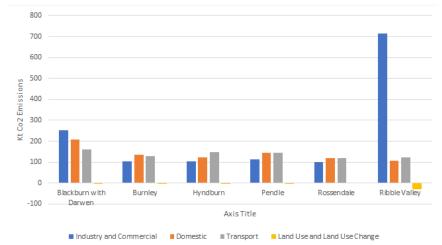
#### **UK Emissions**

- 2.4 In the UK, Greenhouse gas emissions in 2019 are estimated to be 43.8% lower than they were in 1990.
- 2.5 When broken down by gas, UK emissions are dominated by carbon dioxide, which is estimated to have accounted for about 80% of greenhouse gas emissions in the UK in 2019. Weighted by global warming potential, methane accounted for about 12% of UK emissions and nitrous oxide for about 5%. Fluorinated gases accounted for the remainder, around 3%.
- 2.6 Broken down by sector, in 2019, 27% of net greenhouse gas emissions in the UK were estimated to be from the transport sector, 21% from energy supply, 17% from business, 15% from the residential sector and 10% from agriculture. The other 10% was attributable to the remaining sectors: waste management, industrial processes, the public sector, land use change and the forestry sector.

#### **Burnley CO2 Emission Statistics**

- 2.7 CO2 emissions across the UK generally show a downward trend, including in Burnley.
- 2.8 Between 2018 and 2019, CO2 emissions decreased in 360 out of the 379 local authorities in the UK (95%). The main driver of the decrease in UK emissions was a change in the fuel mix for electricity generation, with a decrease in the use of coal and more use of renewables.
- 2.9 Burnley's per person (per capita) emission figure is the third lowest of all the Lancashire authorities (only Blackpool at 3.4 tonnes and Blackburn with Darwen at 4.4 tonnes are lower) and is well below the Lancashire average of 5.6 tonnes and the UK average of 5.2 tonnes.
- 2.10 Estimates for Burnley in 2019 showed that the domestic sector continues to be the most significant contributor to man-made CO2 emissions (136,200 tonnes) followed by transport (130,000) and the industrial/commercial sector (104,300). Two large cement works have a substantial impact on the outturn for Ribble Valley.





**Source: Lancashire County Council** 

Estimated carbon emissions (overall in kilotonnes and per person in tonnes)

ID	Area name	Industry and Commercial	Domestic	Transport	Land use change and forestry	Total emissions	Per Capita Emissions (tonnes)
1	Bumley	104.3	136.2	130.0	-0.6	396.2	4.5
2	Chorley	86.4	176.0	354.5	4.6	651.9	5.5
3	Fylde	116.2	131.0	177.1	50.2	486.2	6.0
ŧ	Hyndbum	104.2	121.9	146.8	-3.2	379.1	4.7
5	Lancaster	162.4	203.6	366.6	57.0	825.9	5.7
6	Pendle	114.3	145.4	143.7	-1.2	411.9	4.5
7	Preston	139.1	199.6	321.8	0.6	706.3	4.9
8	Ribble Valley	713.0	107.1	123.2	-29.5	922.9	15.2
9	Rossendale	99.5	119.6	118.8	2.7	347.1	4.9
10	South Ribble	238.7	166.2	243.2	3.9	663.1	6.0
11	West Lancashire	257.2	176.1	229.9	230.8	925.2	8.1
12	Wyre	173.2	173.1	233.5	93.5	686.5	6.1
13	Lancashire-12	2,308.6	1,855.8	2,589.0	408.7	7,402.3	6.1
14	Blackbum with Darwen	250.9	209.3	161.1	-0.5	651.8	4.4
15	Blackpool	97.3	203.8	126.0	1.3	471.4	3.4
16	Lancashire-14	2,656.8	2,268.9	2,876.1	409.5	8,525.5	5.6
17	North West	12,238.0	10,527.4	13,917.3	329.8	38,541.6	5.3
18	England	84,709.0	77,627.5	104,187.0	-704.8	276,089.6	4.9
19	United Kingdom	114,151.4	94,532.1	124,303.4	-1,025.4	344,511.6	5.2

Source: UK local authority carbon dioxide emissions estimates 2019 (service.gov.uk)

# 3. National and Local Policy

#### **Emissions Targets**

- 3.1 Successive governments have taken steps to limit the UK's emissions of greenhouse gases through legally binding targets. As part of an international effort the UK has been signed up to the Kyoto Protocol since 1995 and in 2016 ratified the Paris Agreement.
- 3.2 The 2008 Climate Change Act committed the Government to reducing targeted UK greenhouse gas emissions by at least 80% in 2050 (from 1990 levels). In 2019, the 2008 Act was amended to replace the previous 80% target with a new goal of reaching 'net zero' greenhouse gas emissions by 2050¹. Net zero refers to the balance between the amount of greenhouse gas produced and the amount removed from the atmosphere.

#### **Renewable Energy Targets**

3.3 The Government has committed to a tenpoint plan for a green industrial revolution<sup>2</sup>. This includes ambitious targets and major investment into industries, innovation and infrastructure that will accelerate the UK's path to net zero by 2050. To date the Government has confirmed that offshore wind will produce more than enough electricity to power every home in the country by 2030 and the Prime Minister has given a commitment that all electricity generated will come from clean energy sources by 2035<sup>3</sup>.

#### **Petrol and Diesel Vehicles**

3.4 In November 2020 the Government announced that it will bring forward a ban on the sale of new petrol and diesel cars and vans, from 2040 to 2030. The measures were also adapted to include a ban on hybrid cars from 2030. Plug-in-Hybrids are exempt from this ban until 2035.

#### **Building Regulations**

- 3.5 The Building Regulations set minimum standards for many aspects of construction of new buildings and certain alterations, including energy efficiency.
- 3.6 In December 2021 the government introduced changes to the Building Regulations (Part S), effective from 15 June 2022 to require the installation of infrastructure (charging points and/ or cabling) for the charging of electric vehicles for certain building projects. The projects covered include most new dwellings with 'associated' (on site) parking spaces<sup>4</sup>.
- 3.7 In 2019, the Government announced the introduction of a Future Homes Standard for England by 2025. The standard will ensure that new-build homes are future-proofed with low-carbon heating and high levels of energy efficiency. The Government expects that homes built to this standard will produce no operational carbon dioxide (once the supply has been decarbonised), with 75% to 80% lower emissions than those built to current Building Regulations standards. This will mainly be achieved by moving to very high efficiency electrical heating instead of gas boilers with heat pumps becoming the primary heating technology for new homes.

- 3.8 As a stepping-stone to the Future Homes Standard, in December 2021 the Government introduced an interim uplift in building regulations standards, effective from June 2022<sup>5</sup>, that would result in an estimated 31% reduction in carbon emissions from new homes compared to current standards. The emphasis will be on the adoption off a 'fabric first approach' with higher standards for the building envelope and improved airtightness, along with the use of low-carbon heating technologies.
- 3.9 Consultation on a wider Future Buildings Standard for England closed in April 2021 and subject to final analysis of consultation responses, the government states that it aims ensure non-domestic buildings are constructed to be highly efficient, better for the environment, and fit for the future; with implementation of this new standard starting from 2025.
- 3.10 The Government's Heat and Buildings Strategy October 2021<sup>6</sup> sets out how the UK will decarbonise homes and commercial, industrial and public sector buildings, as part of setting a path to net zero by 2050 stating that "We will increase standards for new-builds in the 2020s to ensure that they are ready for Net Zero"

#### **National Planning Policy**

- 3.11 National planning policy<sup>7</sup> identifies the need for the planning system to "support the transition to a low carbon future in a changing climate taking full account of flood risk and coastal change" and "shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience, encourage the reuse of existing resources, including the conversion existing buildings; and support renewable and low carbon energy and associated infrastructure." (National Planning Policy Framework (NPPF) para 152)
- 3.12 By law, Local Plans must include "policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change". 8
- 3.13 The NPPF Para 11 states that all Local Plans "should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects"
- 3.14 In its October 2021 publication 'Net Zero Strategy: Build Back Greener' <sup>9</sup> the government states that it intends to review the National Planning Policy Framework to make sure it contributes to climate change mitigation and adaptation as fully as possible.

#### **Burnley's Local Plan**

- 3.15 The borough's Local Plan was adopted in 2018. In line with the above-mentioned legal requirements and national planning policy <sup>10</sup> it addresses climate change through a number of its policies. It is important to note that the Local Plan only sets the policy framework for new development that requires planning permission.
- 3.16 Climate Change is identified as one of the "Key Issues and Challenges" and reflected in the Plan's Objectives, in particular Objective 1: Delivering Sustainable Growth "To minimise the adverse impacts of climate change to support growth to meet the need for jobs, homes and services in the context of moving towards a low carbon economy and stemming population decline. Growth will be managed so that its takes place in the most appropriate locations, promotes the re-use of previously developed land and buildings, energy efficiency and sustainable design; and encourages the use of decentralised and renewable or low carbon energy sources" (pg.29).
- 3.17 The Local Plan addresses climate change through a number of policies including those that seek to reduce emissions by supporting renewable energy provision and reducing pollution. These policies are considered and applied to all relevant developments across the borough and are central to the determination of applications for planning permission.
- 3.18 Supplementary Planning Documents (SPDs) can be prepared to support the Local Plan. Two of the council's adopted and proposed SPD 's are particularly relevant to climate change:
- Air Quality Management: Protecting Health and Addressing Climate Change SPD (Adopted).
- Design Guide: Addressing Quality and Climate Change SPD. This will provide guidance for on-site renewable energy provision.

- 3.19 Planning decisions by law have to be made in accordance with the local plan unless 'material considerations' indicate otherwise. These material considerations can include SPDs and changes in national policy that follow the plan's adoption.
- 3.20 Although the Council's declaration of a climate emergency post-dates the adoption the local plan, the issues relevant to planning and climate change are addressed in the local plan and there has been no change in national policy since the plan was adopted which would render the local plan out of date. The policies of the local plan provide an up-to-date framework for determining planning applications and balancing the issues of climate change and other social, economic and environmental imperatives.
- 3.21 The Local Plan policies are however constantly monitored to see whether they need updating. Updating a local plan is a long and expensive process which takes a number of years. A local plan must be consistent with national policy and is subject to independent examination by a government appointed inspector.

#### **Planning Reform**

- 3.22 The Government consulted on major changes to the planning system in autumn 2020 through its Planning White Paper 'Planning for the Future'. <sup>11</sup> This proposed major changes to local plans and the developer contributions regime. These changes would require the preparation of an entirely new local plan for Burnley.
- 3.23 The government has taken a "pause" recently "to evaluate proposals in the light of the consultation ... to make sure the planning proposals we have fit with our core mission to level up the country and regenerate communities". It has indicated that its final response to the planning white paper and related legislation will probably come forward in the earlier part of 2022, and that the proposed changes to the planning system will be "channelled through the prism of levelling up". <sup>12</sup>

# 4. The Scope of the Strategy

#### **Burnley Council's Role**

- 4.1 Burnley is within a 'two-tier' area for local government which means that it has both a county council (Lancashire County Council) that delivers certain services and a borough council (Burnley Council) which delivers others. This Strategy will look at what Burnley Council can deliver through its own services and policies and cover key areas where it can work proactively with partners.
- 4.2 Many other Council plans and strategies already take climate change into account e.g. the Local Plan and this new Climate Change Strategy does not seek to repeat or replace these documents but rather to further develop the Council's work on climate change initiatives and set out any new or improved actions that the Council can put in place to address the climate emergency. Where necessary and appropriate, these other plans and strategies will be updated (through the relevant procedures) to reflect this Strategy.

#### **Working with Lancashire County Council (LCC)**

- 4.3 Highways and Transport provision is one of the matters that is the responsibility of LCC (and Blackpool and Blackburn with Darwen unitary councils). These 'upper tier' Council's must prepare a Local Transport Plan (LTP) in consultation with Burnley Council and other stakeholders. The current Lancashire LTP includes the 2014 'East Lancashire Highways and Transport Masterplan' that set out how the area's roads, rail and cycle networks could be improved to improve connectivity, provide additional capacity and reduce congestion.
- 4.4 As part of its ongoing LTP implementation work, LCC prepares a number of further strategies, including,
- Actively Moving Forward A ten-year strategy for Cycling and Walking: This strategy's vision is to make Lancashire "A place where cycling and walking is easily accessible, safe to use, attractive, well maintained, and where we actively promote cycling and walking to all our residents and visitors to the county". Work on a Local Cycling and Walking Infrastructure Plan for Burnley and Pendle is currently underway and will identify potential cycling and walking infrastructure improvements for delivery within the short, medium and long term.
- Lancashire Rights of Way Improvement Plan: Lancashire's first plan was produced in 2005 and updated in 2015 with the aim of improving the condition of local networks and improving access to infrastructure.

#### Working with other key partners

4.5 The Council also works with a wide range of other partners including the Environment Agency, local authorities, Government departments, registered housing providers, private contractors, commercial businesses, private landlords, voluntary groups, charities, and residents. This strategy recognises the contribution these partners make to addressing the climate emergency and where appropriate will cover the work the Council do through these partnerships.

# 5. The Themes

#### **Theme 1 - Vehicle Emissions**

#### Objective 1A - reduce greenhouse gas emissions from vehicles

#### The Issue

- 5.1 Emissions from petrol and diesel vehicles contribute to climate change through greenhouse gas emissions (CO2 and NO2).
- 5.2 This objective of reducing vehicle emissions is one where national policy and technical advances are significant factors for success. The Council's important but limited role is to help provide the infrastructure to enable the switch from engines which burn fossil fuels to other forms of energy. The achievement of this objective will depend on the ability to switch to ultra-low emission vehicles and the availability of charging infrastructure.
- 5.3 There is a challenge in providing charging infrastructure for properties without off-street parking. This is a particular issue in Burnley given the high proportion of pavement-fronting terraced housing stock, most of which does not have off street parking. According to the 2011 Census, 50.1% of Burnley's housing stock consisted of terraced houses compared to the regional average of 30% and England average of 24.5%.

#### **Burnley Council's role**

- 5.4 The Local Plan supports the adoption of ultralow emission vehicles (ULEVs) with its Car Parking Standards which set out the requirements for specific charging bays and charging points for ULEV vehicles in new developments. These will include private facilities at homes and businesses and public facilities at new filling stations and car parks.<sup>13</sup>
- 5.5 These standards will be overtaken in future by the changes to the Building Regulations due to come into force in 2022 and 2023 (See section 3.)
- 5.6 The Council will work closely with the county council to progress on-street charging options and private owners to progress the ULEV charging infrastructure.

#### **Progress**

5.7 Between 2019 and 2020 Burnley recorded a 76% increase in Battery Electric Vehicles, exceeding the Lancashire average of 56%. However, the total number of privately registered Battery Electric Vehicles at the end of 2020 in Burnley was only 42 and the total number of privately registered Plug-in-Hybrid Electric Vehicle at the end of 2020 in Burnley was 46. (DFT Data on Licenced and Registered Vehicles All vehicles (VEH01) - GOV.UK (www.gov.uk).

5.8 The following table shows the number of publicly available chargers of all speeds alongside the number of publicly available rapid chargers.

Table: Availability of Public Chargers

		Publicly Available chargers (All Speeds)	Per 100K Population	% Change		Per 100K Population	% Change
Burnley	April 2020	13	14.7		2	2.3	
	April 2021	18	20.2		3	3.4	
	April 2022	29	32.5	+61.11%	8	9.0	+166.67%
Hyndburn	April 2020	15	18.6		5	6.2	
	April 2021	23	28.4		6	7.4	
	April 2022	22	27.1	-4.35%	<u>5</u>	6.2	-16.67%
Pendle	April 2020	14	15.3		5	5.5	
	April 2021	15	16.3		5	5.4	
	April 2022	16	17.4	+6.67	5	5.4	0.00%
Ribble Valley	April 2020	18	30.0		1	1.7	
	April 2021	21	34.5		1	1.6	
	April 2022	28	45.1	+33.33%	1	1.6	0.00%
Rossendale	April 2020	11	15.5		1	1.4	
	April 2021	15	21.0		2	2.8	
	April 2022	15	21.0	0.00%	2	2.8	0.00%
Lancashire-12	April 2020	282	23.3		89	7.4	
	April 2021	357	29.3		107	8.8	
	April 2022	438	35.7	+22.69%	119	9.7	+11.21%
Northwest	April 2020	1,412	19.4		285	3.9	
	April 2021	1,513	20.6		345	4.7	
	April 2022	1,883	25.6	+24.45%	432	5.9	+25.22%
England	April 2020	14,979	26.8		2,526	4.5	
	April 2021	19,261	34.2		3,523	6.3	
	April 2022	25,884	45.8	+34.39%	4,541	8.0	+28.90%

Source: Electric vehicle charging device statistics: April 2022 - GOV.UK Table EVCD 01a & EVCD 01b.



- 5.9 The Council is working to provide further onstreet public charging infrastructure and is working with the county council to install eight electric vehicle charging points in Kingsway, Burnley with a further two planned in Padiham. The Council are also participating in a countywide scheme to install charging points for taxis.
- 5.10 Four rapid charging points have also been installed in council-owned car parks at Centenary Way and King Street. Feasibility work to install more charging points at other council facilities is currently underway.
- 5.11 During 2021 an officer working group was established to look at the issue of properties with no off-road parking. Work is currently underway preparing a Charging Point Strategy under the On-Street Residential Charging scheme with the aim of submitting a bid to Government for funding. The Council will aim to provide access throughout the Borough, but this will be dependent on identifying sites where it is possible to deliver the infrastructure.
- 5.12 The Council has a programme to replace its existing vehicles and machinery with electric
- alternatives where possible. There are currently 9 electric fleet vehicles in operation with further replacements planned. Horticultural machinery is being replacing wherever possible with electric alternatives and a significant amount of handheld equipment has been replaced with electric options including blowers, strimmers, chainsaws and hedge trimmers.
- 5.13 Rosegrove junction recently saw the completion of improvement works to reduce the incidents of standing traffic creating a more efficient traffic system.

#### Objective 1B - support and improve sustainable transport provision

#### The Issue

5.14 Walking, cycling and the use of public transport instead of private cars reduces overall emissions. This is likely to remain the case for many years until greenhouse gas emitting vehicles are no longer the norm. Improving access to more sustainable modes of travel and encouraging their greater use is an important strand of reducing greenhouse gases.

5.15 Sustainable transport usage has an established hierarchy, as follows:

- pedestrians
- cyclists
- public transport
- private vehicles

#### **Burnley Council's role**

- 5.16 Both the borough and the county council have roles to play in supporting and improving sustainable transport provision.
- 5.17 Burnley Council, not being a 'local highway authority' does not have a direct role in the provision of public transport but works closely with the county council in developing its Local Transport Plan and any specific public transport, cycling and walking strategies.
- 5.18 Through the policies and land allocations set out in the Local Plan, Burnley Council promotes the use of sustainable locations and modes of transport for new developments. The County Council as highways authority provides specialist advice on transport and highway matters in planning applications. In some cases, improvements to public transport and footpath, cycling and riding infrastructure is necessary for schemes to be supported and developers are normally expected to contribute towards these improvements.
- 5.19 Burnley Council also works directly through its Streetscene service and its Green Spaces and Amenity service, to improve off-road footpath and cycle provision. This includes implementing improvements required to support new development.

#### **Progress**

5.20 The Council adopted a Supplementary Planning Document 'Air Quality Management: Protecting Health and Addressing Climate Change' in December 2020. This sets out the requirements for air quality assessments to support planning applications and include appropriate mitigations where necessary. Whilst the primary focus of the policy is on the transport impacts of new development in relation to air quality and the direct impacts on health, it is also recognised that there are benefits in relation to addressing climate change.

5.21 The Local Plan focuses development on the borough's urban areas and supports development of an appropriate scale in the main and small villages. In the four-year period 2017/18 to 2020/2021, figures for the number of new dwellings completed by settlement category were as follows:

• Tier 1 Burnley 739

• Tier 2 Padiham 135

Tier 3 Main Village 107

Tier 4 Small Village 0

Open countryside 8

#### Objective 2 - achieve higher standards of energy efficiency in new and existing buildings

#### The Issue

5.22 Measures to increase thermal efficiency, such as insulating roofs and walls, introducing thermally efficient doors and windows, designing to maximize natural lighting and passive heating or cooling systems; all reduce energy consumption. As energy supply currently relies heavily on fossil fuels, higher energy efficiency levels in buildings and alternative sources of green energy will significantly reduce the greenhouse gas emissions from power stations.

#### **Burnley Council's role**

- 5.23 The Council's Local Plan supports the improvement of energy efficiency levels in development that requires planning permission.
- 5.24 For non-residential developments with a floor space above 1.000 m2 a BREEAM assessment is required to be carried out and a rating of 'very good' or better is expected. For residential development, proposals are expected to incorporate measures to minimise energy and water consumption.
- 5.25 The Council owns and manages a range of different properties for office accommodation, operational purposes, democratic and civil functions, commercial, residential and leisure uses. The Council has a role to ensure that its buildings are energy efficient and is implementing modern methods of property renovation and improvement.
- 5.26 The use of energy efficient appliances, whether fitted to new buildings or purchased for existing properties similarly reduces the use of energy generated through the burning of fossil fuels. These appliances include boilers and lighting systems.
- 5.27 Nationally set Building Regulations include energy efficiency standards for all new buildings and existing buildings when certain alterations are undertaken. Regulation in the private rented sector also determines minimum standards for the energy efficiency of properties that are rented out for residential occupation. The Council has a role to ensure that regulations are adhered to.

- 5.28 In recent years, insulation in Council buildings has been upgraded, energy efficient lighting systems installed, and boilers replaced with modern energy efficient systems.
- 5.29 During the winter of 2021/22 the Council is undertaking a project to implement Minimum Energy Efficiency Standards within the private rented sector following a successful bid to Government for additional resources. The programme will see every private rented property that is currently operating below the minimum standard of EPC rating E, brought up to at least this standard.
- 5.30 The Council operates a landlord licensing scheme that covers over 3,400 rented properties. Private landlords who rent out a property covered by the scheme must qualify for a licence to operate. Through this programme the Council work in partnership with the private rented sector to improve property condition which includes heating and insulation measures.
- 5.31 The Council is a partner in the Cosy Homes in Lancashire (CHiL) consortium where local authorities utilise energy company funding to promote insulation and efficient heating systems in properties throughout Lancashire. Over the past year the partnership has been successful in securing £3.5 million pounds to improve the energy efficiency of Burnley's homes.

#### Theme 3 - Emissions from the use and manufacture of products and materials

#### Objective 3A – reduce energy use in construction, manufacturing, and business operations

#### The Issue

- 5.32 The extraction, treatment and transportation of building materials uses energy and the manufacture of certain building products, including cement, use high levels of energy to produce and generate greenhouse gas emissions through certain chemical processes.
- 5.33 Low embodied energy materials, such as timber, providing these come from sustainable sources, require less energy too extract, treat and transport. Previously used materials such as demolition waste is also regarded as a low embodied energy material. The lowest energy use method of all, in most cases, is the reuse of existing buildings.
- 5.34 Manufacturing processes and business operations in general can also play a significant role in reducing emissions by using more efficient machinery and equipment, utilising green energy alternatives and in the development of low carbon technologies.

#### **Burnley Council's role**

5.35 The Council has a role as planning and housing authority and as a partner in specific development and regeneration projects. Through our Economy and Growth unit we also work closely with businesses across the borough and promote Burnley as a prime location for business operations.

- 5.36 Policy SP5 of the Local Plan expects developments wherever practical to use low embodied energy materials, including materials that are sourced locally or involve the appropriate reuse of existing resources through the conversion of existing buildings or the reuse of demolished structures.
- 5.37 The Council delivers a range of regeneration and development projects, for example the recently completed Sandygate Halls student accommodation. These regeneration projects have wide benefits, often re-utilising and re-using brownfield land and previously vacant buildings.
- 5.38 "OnTheBanks" regeneration of Canalside properties in Burnley Town Centre has seen the reuse of Victorian buildings for university education, business premises and leisure facilities. Preserving Burnley's heritage and making modern efficient use of derelict buildings and brown field land.
- 5.39 The Council's Empty Homes Programme aims to return into use a minimum of 90 properties each year through a combination of direct purchase and renovation, loans to landlords and support and advice to the owners of empty properties.
- 5.40 The Empty Homes Programme was first set up in 2002 and has purchased and renovated 164 properties, issued 103 loans to landlords to refurbish properties and returned close to 1,000 properties back in to use. As well as promoting the reuse of existing buildings the Council improves the energy efficiency of homes acquired to minimise their carbon footprint and help tackle fuel poverty.

#### Theme 3 - Emissions from the use and manufacture of products and materials

#### Objective 3B – increase recycling and the use of low embodied energy products

#### The Issue

5.41 Utilising renewable or recycled materials has positive effects for climate change and safeguards resources for future generations by limiting waste that goes to landfill. These products can be anything from cars and computers to flooring and paper.

#### **Burnley Council's Role**

5.42 The Council recognises it has an essential role in promoting and utilising renewable and recycled materials throughout its procurement activities.

- 5.43 Council buyers review purchasing to reduce usage and adopt more sustainable goods and services. A condition of lease for some retail outlets on Council sites includes the requirement for biodegradable containers and cutlery as they require less energy in their manufacture.
- 5.44 Where appropriate through contracts, suppliers are required to use renewable or recycled materials in their production and operations. Along with the use of environmental criteria in the award of contracts, the Council also ensures that where appropriate, suppliers' environmental credentials are considered in supplier evaluation.

#### **Theme 4 - Renewable energy**

#### Objective 4 - increase renewable energy capacity and provision

#### The Issue

- 5.45 Renewable energy is the term for energy that is created or captured from natural and repeated environmental processes and does not generate greenhouse gas emissions. Renewable energy sources include sunlight, wind, water, or the Earth's own heat.
- 5.46 Low carbon energy is energy that has lower emissions than the conventional use of fossil fuels.
- 5.47 New development can provide opportunities for self-generation of electricity and the use of renewable power sources for heating. It is normally more cost effective to install equipment at the initial construction stage rather than to retrofit.
- 5.48 Renewable energy at the individual householder or business level can include micro turbines, solar hot water panels, photovoltaic panels and ground or air source heat pumps. On larger developments, there can be wider opportunities for communal schemes.

#### **Burnley Council's role**

- 5.49 The Council is responsible for determining planning applications for most renewable energy schemes and the Local Plan supports renewal energy generation and seeks renewable and low carbon energy provision through new development.
- 5.50 The Council has a role regarding its own buildings to ensure they are energy efficient and where possible incorporate renewable energy technologies.
- 5.51 Social housing stock in Burnley is owned by registered housing providers with most of the stock owned and managed by Calico Homes. The Council and registered housing providers work together to improve housing standards and supply throughout the borough.
- 5.52 Burnley Council also work closely with the private rented sector through Selective Licensing Schemes, Landlord Accreditation and the Private Rented Sector Forum to improve the management and condition of privately rented homes across the borough.
- 5.53 The Council's business support team work closely with the East Lancashire Chamber Low Carbon Project and other programmes encouraging Burnley businesses to adapt new low carbon technologies and move to net zero.

#### **Progress**

5.54 In 2019, operational renewable energy schemes and those with permission to operate in Burnley had a capacity of 35.7MW. The number of equivalent homes powered using this renewable energy capacity is 20,755 i.e. 49.6% of the Borough's total housing stock.

Technology	Installs	Capacity (MW)	Equivalent homes powered
Onshore Wind	19	28.7	16,685
Photovoltaics	988	5.1	2,965
Landfill Gas	1	1.9	1,105
Total		35.7	20,755

5.55 Following a successful bid to the national Green Homes Fund the Council has secured funding to improve a number of Calico homes and private rented properties with insulation and renewable energy products.

#### Theme 5 – Enhancing the natural environment

#### Objective 5 - protect and increase trees, woodland, meadowland and habitats

#### The Issue

- 5.56 Trees, shrubs and semi-natural grassland are net absorbers of carbon dioxide and can reduce flood risk by absorbing water and stabilizing land. They can also provide cooling and shading to mitigate the effects of rising temperatures and provide important habitats for other plants and species which may be susceptible to the effects of climate change.
- 5.57 Loss of trees can arise through development, agricultural practices, the natural life cycle and disease. Where this happens it can be mitigated through replanting but it is also important to minimise loss and ensure that together we protect and replenish our trees. Planting of additional trees and shrubs can also mitigate or offset the impacts of necessary development.

#### **Burnley Council's Role**

- 5.58 As local planning authority, Burnley Council determines applications for a wide range of developments. Burnley's Local Plan includes policies to protect identified open spaces, the wider countryside and to protect and enhance green infrastructure generally. It also includes a policy related to protecting specific trees and trees on development sites.
- 5.59 Through the imposition and assessment of Tree Preservation Orders, the Council has a role in the protection and maintenance of some of the most valuable trees across the borough.
- 5.60 Through its Green Spaces and Amenities service the Council owns and manages approximately 550 hectares of parkland, woodland and green open space. Central to this role is the protection and enhancement of this environment for the use and enjoyment of residents and visitors to Burnley.

- 5.61 The Council has planted more than one million trees in Burnley over the last 25 years on public and privately owned land through the Forest of Burnley project. This has doubled the borough's tree cover, from just over 4% to the current 8.5%, and the project has also restored over 200 hectares of neglected woodland. The new woodland is absorbing up to 2,000 tonnes of CO2 per year. The Council maintains a healthy and growing tree population in parks and green spaces and works with park friends' groups to plant young trees.
- 5.62 The Council continues to work with partners including the Trees for Burnley, River Ribble Trust, Forestry Commission and adjoining authorities to secure funding for new woodland planting. During the period to March 2022, the Pennine Lancashire Treescapes Project (PLanT) will create 48 new micro-woodlands with 16.000 native trees.
- 5.63 As part of the Council's Rethinking Parks programme, and area of 76 hectares of formerly frequently mown amenity grassland is now being managed as urban wildflower meadows, which is saving 17 tonnes of CO2 emissions per year. Grass which is managed as semi-natural meadows also sequesters more CO2 than frequently mown grass. Altogether, 40% of Burnley's open space is now being managed as low intensity, seminatural greenspace in the form of woodlands and meadow.

#### Theme 6 - Flood Risk

# Objective 6A - limit the impacts of flood risk on and from new development

#### The Issue

- 5.64 Climate Change is strongly suspected to be linked to increased overall rainfall and the frequency of storm events which can cause coastal, river and surface water flooding.
- 5.65 The Environment Agency is responsible for establishing flood zones and calculate risks.
- 5.66 Lancashire County Council is the Lead Local Flood Authority and is responsible for managing flood risk from all local sources including surface water, groundwater or from ordinary watercourses. As part of its role, the County Council has produced a Local Flood Risk Management Strategy which explains how it will manage local flood risk.

#### **Burnley Council's Role**

- 5.67 To support the Local Plan, a borough-wide strategic flood risk assessment was undertaken, directing development in Burnley to areas at the lowest risk of flooding and making sure sites can be made safe. The planning process requires site specific flood risk assessments to be undertaken for large and higher risk sites at the planning application stage, to ensure that new development is not only safe from flooding but does not cause or exacerbate flooding elsewhere.
- 5.68 The Local Plan has strict standards that require greenfield surface water run off rates for major developments. This effectively means that after the development is complete, the runoff rate is the same as if it has remained undeveloped. This often involves the use of Sustainable Urban Drainage Systems that include measures to manage and store water on site.

#### Objective 6B - protect existing properties and infrastructure from flooding and improve resilience

#### The Issue

- 5.69 In some circumstances it is necessary to introduce flood defences that can include walls, gates, embankments, or upstream storage of water in areas prone to surface water flooding.
- 5.70 Resilience measures are also an important defence against flooding and can include warning systems, evacuation plans and adaptations to properties that are at high risk of flooding. These measures can limit the damage caused by flood water and aid a faster recovery following a flood.

#### **Burnley Council's Role**

- 5.71 The Council has a central role to play in coordinating activity to manage and mitigate the risk of flooding working with the county council as lead flood authority, the Environment Agency and local communities.
- 5.72 The Council operates an emergency plan response to assist local communities and businesses to deal with a flood emergency and manage the clean-up and recovery.

- 5.73 Working closely with the Environment Agency the Council has secured match funding to implement a flood defence scheme in Padiham Town Centre.
- 5.74 Following recent flood events in 2018 and 2020 the Council administered the Flood Recovery and Resilience Grant Scheme that has seen close to £120K of grant fund awarded to residents and businesses to help them recover from the effects of flooding and make their premises more resilient to any future event.

#### Theme 7 – Communication and Stakeholder Engagement

# Objective 7A – develop an effective communications strategy

#### The Issue

- 5.75 Climate Change affects everyone and requires input and action across the entire spectrum of society. Much good work and innovation is taking place across different sectors and within communities and it is vital to have effective communication that is wide-reaching and informative.
- 5.76 It is important to communicate the challenges we face, the role we can all play and the actions we can take. It is equally important to communicate the excellent work that is taking place and encourage people's enthusiasm and drive to contribute to the collective effort.
- 5.77 Part of the role of communication is to encourage and persuade behavioural change and inform people of the benefits and opportunities that are possible through simple lifestyle changes both personally and for society at large.

#### **Burnley Council's Role**

5.78 The Council has a long track record of communication through digital media, consultation and direct contact with residents, businesses and stakeholders through service provision. The Council is also a large employer and procurer of services which puts us in a prime position to reach a large number of people and organisations.

#### **Objective 7B – engage with stakeholders**

#### The Issue

- 5.79 No individual organisation can work alone to address climate change and many of the key themes of this strategy requires the effort, collaboration and collective action of everyone including communities, Government, business, the voluntary sector and the public and private sector in all its forms.
- 5.80 Engaging effectively with stakeholders is important to understand where we can collaborate to maximise our impact, when we can add value to projects led by other organisations and how we learn about best practice and innovation.

#### **Burnley Council's Role**

- 5.81 The Council through its role as community leader engages with many areas of the public, private and voluntary sectors and can facilitate communication across sectors and organisations to raise the profile of climate change action.
- 5.82 Solutions to Climate Change will come through collaboration with communities, businesses and other sectors of society. Young people will also be central to achieving the long-term ambitions for tackling climate change.

- 5.83 The Council continues to use a variety of mediums to communicate key messages on climate change and engages with media organisations, social media and communities directly. This strategy aims to develop this work and increase its effectiveness.
- 5.84 The Council has engaged effectively with a range of organisations to progress green initiatives that include the Green Homes Programme with Calico and business innovation through the East Lancashire Chamber of Commerce. We will continue to build on this collaborative work to engage with as many organisations and stakeholders as we can.

# 6. The Action Plan

6.1 The Action Plan identifies the proposals, initiatives and actions the Council is taking, or proposes to take to meet the objectives outlined in this strategy. It identifies the lead service areas that are responsible for delivering the action, the timescale and the expected outputs. Many of the actions are continuous and will span the life of this strategy and beyond, where this is the case the timescale for delivery will be listed as ongoing. The annual review of the action plan will identify any key milestones and target dates for the longer-term actions.

#### **Monitoring and Review**

- 6.2 To ensure this strategy remains current and delivers on the actions set out it is important to have a robust process of monitoring and review. This process will record and report on the progress being made and update the action plan to ensure it remains current and challenging.
- 6.3 The strategy is recognised as an organic document that will development over time. It will be reviewed in full every 12 months with the publication of an updated plan that will report on the progress made and include any new actions that have been identified. This document will be presented to the Council's Executive Committee for approval.
- 6.4 The ongoing work programme will be reviewed by officers through the sustainability working group with progress reported to Members through the strategic plan updates at Full Council.

# Action Plan 2022-2026

#### Objective 1A – reduce greenhouse gas emissions from vehicles

#### i - provide new electric vehicle charging infrastructure

#### **ACTIONS**

Explore further opportunities to increase the electric charging infrastructure on all existing council car parks in the town centre and at other facilities

WHO WILL LEAD ON THIS ACTION?
Streetscene

TIMESCALE FOR DELIVERY Ongoing

#### **OUTPUTS AND MILESTONES**

Complete a review of the car park portfolio and identify opportunities for installation. Monitor and report on the additional number of chargers installed

#### **ACTIONS**

Work with Lancashire County Council to explore opportunities for the provision of electric charging infrastructure on the borough's highways

WHO WILL LEAD ON THIS ACTION?
Streetscene

TIMESCALE FOR DELIVERY Ongoing

OUTPUTS AND MILESTONES

Monitor and report on the
additional number of chargers
installed

#### **ACTIONS**

Explore ways to improve charging infrastructure for existing development - in particular private housing without off street parking. Identify grant opportunities

WHO WILL LEAD ON THIS ACTION? Electric Vehicle Working Group

TIMESCALE FOR DELIVERY Ongoing

OUTPUTS AND MILESTONES

Monitor and report on the schemes
developed during the life of the
strategy

#### **ACTIONS**

Develop and Implement the Electric Vehicle Charging Strategy

WHO WILL LEAD ON THIS ACTION? Streetscene

TIMESCALE FOR DELIVERY Ongoing

OUTPUTS AND MILESTONES
Strategy approved and actions implemented

#### **Objective 1A – reduce greenhouse gas emissions from vehicles**

ii - require charging infrastructure through new developments

#### **ACTIONS**

Implement planning policies for all developments requiring and supporting the provision of ULEV charging points. (Policy IC3 and NE5)

WHO WILL LEAD ON THIS ACTION?

Planning Service

TIMESCALE FOR DELIVERY

Ongoing

#### **OUTPUTS AND MILESTONES**

Monitor annually the number of charging points installed on new residential and commercial developments

#### Objective 1A – reduce greenhouse gas emissions from vehicles

iii - limit vehicle emissions from new developments requiring planning permission

#### **ACTIONS**

Apply planning policies for new developments requiring planning permission to limit emissions from vehicles (including Policy NE5 and the Air Quality Management: Protecting Health and Addressing Climate Change SPD)

WHO WILL LEAD ON THIS ACTION? Planning Service

TIMESCALE FOR DELIVERY
Ongoing

#### **ACTIONS**

Update Validation Checklist to reflect new information requirements and advise applicants accordingly

WHO WILL LEAD ON THIS ACTION? Planning Service

TIMESCALE FOR DELIVERY March 2022

OUTPUTS AND MILESTONES
Validation checklist amended and in operation

#### Objective 1A – reduce greenhouse gas emissions from vehicles

iv - reduce vehicle emissions from existing development

**ACTIONS** 

Facilitate hybrid working for council staff

WHO WILL LEAD ON THIS ACTION?

Human Resources, Policy and Engagement

TIMESCALE FOR DELIVERY

Ongoing

**OUTPUTS AND MILESTONES** 

Monitor and record the percentage of time employees are working from home

**ACTIONS** 

Work with the Highways Authority and Highways England to support junction improvements on key transport networks

WHO WILL LEAD ON THIS ACTION? Economy and Growth

TIMESCALE FOR DELIVERY Ongoing

**OUTPUTS AND MILESTONES** 

Report on planned and implemented improvements

**ACTIONS** 

Produce an annual Air Quality Monitoring Plan and implement DEFRA recommendations

WHO WILL LEAD ON THIS ACTION? Environmental Health

TIMESCALE FOR DELIVERY Annually

**OUTPUTS AND MILESTONES**Air Quality Plan produced;
recommendations implemented

**ACTIONS** 

Keep up to date on any additional air quality requirements within the proposed Environment Act

WHO WILL LEAD ON THIS ACTION? Environmental Health

TIMESCALE FOR DELIVERY Ongoing

# **Objective 1A – reduce greenhouse gas emissions from vehicles**

iv - reduce vehicle emissions from existing development

**ACTIONS** 

Implement Euro 6 vehicles standards across the borough's taxi fleet

WHO WILL LEAD ON THIS ACTION? Licensing

TIMESCALE FOR DELIVERY
December 2023

OUTPUTS AND MILESTONES

Monitor percentage of compliance

**ACTIONS** 

Investigate options to promote and incentivise the use of Electric and Hybrid vehicles for the taxi fleet

WHO WILL LEAD ON THIS ACTION? Licensing

TIMESCALE FOR DELIVERY Ongoing

OUTPUTS AND MILESTONES Monitor number of vehicles recorded annually

#### Objective 1A – reduce greenhouse gas emissions from vehicles

v - replace existing council vehicles and machinery with electric alternatives

#### **ACTIONS**

Investigate and develop proposals for green alternatives to waste collection operations to inform the future procurement of the waste collection contract

WHO WILL LEAD ON THIS ACTION?
Streetscene

TIMESCALE FOR DELIVERY June 2025

# Outputs AND MILESTONES

Options assessed and evaluated, Tender exercise undertaken, Contractor appointed.

#### **ACTIONS**

Burnley Leisure to replace golf ball collectors, 3G pitch tractor and school van with electric alternatives

WHO WILL LEAD ON THIS ACTION?
Burnley Leisure

TIMESCALE FOR DELIVERY Ongoing

**OUTPUTS AND MILESTONES**Introduction of electric alternatives

#### **ACTIONS**

Keep under review the Council's grey fleet of operational vehicles and look at introducing new electric vehicles for officer use as required, exploring cross unit work

WHO WILL LEAD ON THIS ACTION?
All units

TIMESCALE FOR DELIVERY Ongoing

**OUTPUTS AND MILESTONES**Introduction of new electric vehicles

#### **ACTIONS**

Where there are no alternatives to diesel vehicles for Council operations, reduce the lease period to allow for movement to electric as soon as practically possible once the technology is available and the business case is viable

WHO WILL LEAD ON THIS ACTION?
Green Spaces and Amenities

TIMESCALE FOR DELIVERY Ongoing

#### **OUTPUTS AND MILESTONES**

As leases are renewed increase electric vehicle usage

#### Objective 1A – reduce greenhouse gas emissions from vehicles

v - replace existing council vehicles and machinery with electric alternatives

#### **ACTIONS**

Replace parks equipment with electric alternatives as they become available

WHO WILL LEAD ON THIS ACTION?
Green Spaces and Amenities

TIMESCALE FOR DELIVERY Ongoing

OUTPUTS AND MILESTONES
Increase overtime the amount of electric equipment in operation

#### **ACTIONS**

Investigate the option to introduce an Electric Car Leasing Scheme for Council employees to encourage staff to switch to electric vehicles

WHO WILL LEAD ON THIS ACTION? Finance and Property/Human Resources

TIMESCALE FOR DELIVERY
December 2022

OUTPUTS AND MILESTONES
Appraisal carried out and
recommendations made

#### **Objective 1B - support and improve sustainable transport provision**

i - ensure new development is sustainably located appropriate to its nature and scale

#### **ACTIONS**

Implement Local Plan policies requiring and supporting sustainable locations and travel (Policy SP4, IC1 and IC2)

WHO WILL LEAD ON THIS ACTION? Planning service

TIMESCALE FOR DELIVERY Ongoing

#### **ACTIONS**

Ensure that maximum benefit is achieved through developer contributions on new development to contribute to sustainable transport methods

#### WHO WILL LEAD ON THIS ACTION?

Planning service/Green Spaces and Amenities

#### TIMESCALE FOR DELIVERY

December 2022

#### **OUTPUTS AND MILESTONES**

Monitor S106 agreements and amounts received and spent

#### Objective 1B - support and improve sustainable transport provision

ii - improve the footpath, cycling and riding infrastructure and its use

#### **ACTIONS**

Work with partners to implement the Lancashire Cycling and Walking Improvement Plan (LCWIP) seeking opportunities to develop better links to sustainable transport infrastructure and identify funding opportunities for new projects

WHO WILL LEAD ON THIS ACTION?
Green Spaces and Amenities

TIMESCALE FOR DELIVERY Ongoing

**OUTPUTS AND MILESTONES** Funding awards received

#### **ACTIONS**

Maximise funding for sustainable transport links through planning obligations attached to planning permissions

WHO WILL LEAD ON THIS ACTION? Green Spaces and Amenities

TIMESCALE FOR DELIVERY Ongoing

OUTPUTS AND MILESTONES
Monitor S106 agreements and
amounts received and spent

#### **ACTIONS**

Implement Local Plan policies requiring and supporting the use and provision of sustainable travel (Policy SP4, IC1 and IC2)

WHO WILL LEAD ON THIS ACTION? Planning Services

TIMESCALE FOR DELIVERY Ongoing

OUTPUTS AND MILESTONES

Monitor the location of new housing development

#### **ACTIONS**

Input into Lancashire County Council plans including the local transport plan and cycling and walking strategies

WHO WILL LEAD ON THIS ACTION?
Planning Services/Green Spaces and
Amenities

TIMESCALE FOR DELIVERY Ongoing

**OUTPUTS AND MILESTONES**Plans updated and adopted

# **Objective 1B - support and improve sustainable transport provision**

iii. increase the use of public transport services in favour of the car

#### **ACTIONS**

Work with the Economic Recovery and Growth Board to lobby for increased train services on the Blackburn-Burnley-Manchester line

WHO WILL LEAD ON THIS ACTION? Economy and Growth

TIMESCALE FOR DELIVERY Ongoing

#### **ACTIONS**

Work with neighbouring local authorities, Lancashire County Council, and the Lancashire Entreprise Partnership, to promote electrification of the rail line from Preston, through Pennine Lancashire, into West Yorkshire and Greater Manchester, as an alternative to the M62 and Northern Powerhouse Rail Corridors

WHO WILL LEAD ON THIS ACTION? Economy and Growth

TIMESCALE FOR DELIVERY Ongoing

### Objective 2 - achieve higher standards of energy efficiency in new and existing buildings

i - support and encourage high energy efficient standards in new buildings

#### **ACTIONS**

Implement Local Plan policies encouraging high standards of energy efficiency in new buildings

WHO WILL LEAD ON THIS ACTION? Planning Service

TIMESCALE FOR DELIVERY Ongoing

OUTPUTS AND MILESTONES

Monitor renewable energy
installations for major developments

#### **ACTIONS**

Review Developer Contributions SPD to take account of increased construction costs due to proposed uplift in national building regulations, biodiversity net gain and any other new statutory requirements

WHO WILL LEAD ON THIS ACTION? Planning Service

TIMESCALE FOR DELIVERY March 2023

**OUTPUTS AND MILESTONES** Review undertaken and SPD amended

# Objective 2 - achieve higher standards of energy efficiency in new and existing buildings

ii - implement national changes to the building regulations and the future homes standard

#### **ACTIONS**

Implement changes to Building Regulations as they are introduced. Communicate and provide advice on the changes to applicants and stakeholders

WHO WILL LEAD ON THIS ACTION?
Building Control Service

# TIMESCALE FOR DELIVERY Expected:

- B Regs 2022
- Future Homes Standard 2025

#### **OUTPUTS AND MILESTONES**

Timescales depend on implementation date of national changes

#### Objective 2 - achieve higher standards of energy efficiency in new and existing buildings

iii - promote, facilitate, and enforce higher energy efficiency standards in the private rented sector

ACTIONS
Complete the Minimum
Energy Efficiency
Programme (MEES) in the
private rented sector and
ensure all properties are
achieving at least an EPC

WHO WILL LEAD ON THIS ACTION?
Housing Service

TIMESCALE FOR DELIVERY July 2022

OUTPUTS AND MILESTONES

rating of E

All private rented sector properties have an EPC rating of at least E. Enforcement action is taken against all those properties that do not comply

**ACTIONS** 

Incorporate housing legislation on MEES into the housing disrepair service

WHO WILL LEAD ON THIS ACTION?
Housing Service

TIMESCALE FOR DELIVERY July 2022

OUTPUTS AND MILESTONES All officers trained and standards implemented into work programme **ACTIONS** 

Review the code of practice for Landlord Accreditation to explore options to increase the level of energy efficiency required

WHO WILL LEAD ON THIS ACTION?
Housing Service

TIMESCALE FOR DELIVERY
December 2022

OUTPUTS AND
MILESTONES
Code approved and in use

ACTIONS

Consult on and redesignate selective licensing areas where appropriate to continue to improve the standard of properties in the private rented sector

WHO WILL LEAD ON THIS ACTION?
Housing Service

TIMESCALE FOR DELIVERY March 2022

OUTPUTS AND MILESTONES March 2022 - Burnley Wood, Leyland Road

November 2024 -Gannow, Queensgate, Trinity and Daneshouse **ACTIONS** 

Keep the ward analysis programme under annual review to assess whether any new licensing areas require further investigation based on data

WHO WILL LEAD ON THIS ACTION?
Housing Service

TIMESCALE FOR DELIVERY Ongoing

OUTPUTS AND
MILESTONES
Carry out annual review

#### Objective 2 - achieve higher standards of energy efficiency in new and existing buildings

iv – promote and facilitate higher energy efficiency standards in owner occupied properties

#### **ACTIONS**

Working through the Cosy Homes in Lancashire partnership promote energy efficiency improvements to owner occupiers throughout the borough

#### WHO WILL LEAD ON THIS ACTION?

Housing Service - Home Improvement Agency

# TIMESCALE FOR DELIVERY

Ongoing

#### **OUTPUTS AND MILESTONES**

Monitor annually the number of homes in the borough that have taken up measures through CHiL.

#### ACTIONS

Introduce a Residential Extensions SPD (Design Guide) to inform planning applications and permissions

#### WHO WILL LEAD ON THIS ACTION?

Planning Service

#### TIMESCALE FOR DELIVERY

July 2022

#### **OUTPUTS AND MILESTONES**

Design guide in operation

## Objective 2 - achieve higher standards of energy efficiency in new and existing buildings

v - work in partnership with register housing providers to maximise the energy efficiency of their existing dwellings

#### **ACTIONS**

Work with housing association partners to maximise the funding available through the Green Homes Grant and other funding streams to contribute to retrofit programmes for their stock

WHO WILL LEAD ON THIS ACTION? Housing Service/Register Providers

TIMESCALE FOR DELIVERY Ongoing

OUTPUTS AND MILESTONES

Monitor level of funding received,
and properties improved

#### **ACTIONS**

Work with housing association developer partners to facilitate and promote the move to carbon ready and carbon zero homes on new affordable housing developments

WHO WILL LEAD ON THIS ACTION? Housing Service/Register Providers

TIMESCALE FOR DELIVERY Ongoing

OUTPUTS AND MILESTONES

Number of homes developed at net zero and carbon ready

# Theme 2 - Emissions from use and occupation of buildings

## Objective 2 - achieve higher standards of energy efficiency in new and existing buildings

vi - ensure the council's property portfolio has high energy efficiency standards

#### **ACTIONS**

Produce individual building surveys to assess scope for improving EPC ratings of properties owned by the Council

WHO WILL LEAD ON THIS ACTION? Property Services/Liberata

TIMESCALE FOR DELIVERY September 2022

OUTPUTS AND MILESTONES
Review of EPC ratings and
improvements implemented

### **ACTIONS**

Implement new measures to ensure the efficient use of crematorium services

WHO WILL LEAD ON THIS ACTION?
Green Spaces and Amenities

TIMESCALE FOR DELIVERY July 2022

**OUTPUTS AND MILESTONES**Policy introduced and operational

### **ACTIONS**

Record and track energy usage across the Council's business operations and establish a baseline to monitoring progress

WHO WILL LEAD ON THIS ACTION?

Audit

TIMESCALE FOR DELIVERY June 2022

**OUTPUTS AND MILESTONES**Process in place and baseline established

### **ACTIONS**

Carry out a desk top study and structural surveys where appropriate to assess the suitability of roof structures for the installation of Solar Panels on Council owned buildings

WHO WILL LEAD ON THIS ACTION? Liberata

TIMESCALE FOR DELIVERY September 2022

**OUTPUTS AND MILESTONES**Study produced and surveys done with options identified

# Theme 2 - Emissions from use and occupation of buildings

## Objective 2 - achieve higher standards of energy efficiency in new and existing buildings

vii - ensure projects supported by the council promote high energy efficiency standards

#### **ACTIONS**

Work with operators to review café leases to include climate change initiatives and methods of operation focusing on waste management, supply chains and use of materials

WHO WILL LEAD ON THIS ACTION? Green Spaces and Amenities

TIMESCALE FOR DELIVERY Ongoing

OUTPUTS AND MILESTONES
Lease updated as reviewed

### **ACTIONS**

Appoint a Sustainability Officer to co-ordinate the work of the Council, strengthen our work with partners and monitor our climate emergency commitments

WHO WILL LEAD ON THIS ACTION? Human Resources/Housing Service

TIMESCALE FOR DELIVERY September 2022

OUTPUTS AND MILESTONES
Post filled and work programme
agreed

### **ACTIONS**

Carry out an independently accredited carbon literacy programme for all Council employees and appoint carbon champions

WHO WILL LEAD ON THIS ACTION?
All units

TIMESCALE FOR DELIVERY July 2022

OUTPUTS AND MILESTONES
All employees trained and carbon champions appointed

# Theme 2 - Emissions from use and occupation of buildings

## Objective 2 - achieve higher standards of energy efficiency in new and existing buildings

viii - maximise the use of energy from renewable and low carbon sources and for council operations

### **ACTIONS**

Explore the options for the use of renewable energy suppliers for electricity and bio-diesel for vehicles and machinery where electric alternatives are not available

WHO WILL LEAD ON THIS ACTION? Liberata/All units

TIMESCALE FOR DELIVERY
December 2022

**OUTPUTS AND MILESTONES** 

Review carried out and initial findings produced

### Objective 3A - reduce energy use in construction, manufacturing, and business operations

i - encourage and promote the use of low energy equipment and materials

#### **ACTIONS**

Work with the East Lancashire Chamber of Commerce and University of Central Lancashire to promote and deliver the Green Principles Grant Programme targeting SMEs to encourage the introduction of low carbon business operations

WHO WILL LEAD ON THIS ACTION? Economy and Growth

TIMESCALE FOR DELIVERY March 2023

OUTPUTS AND MILESTONES
Grant programme fully allocated with examples of best practice identified

#### **ACTIONS**

Work with partners to support the development of the Low Carbon Accelerator Pilot

WHO WILL LEAD ON THIS ACTION? Economy and Growth

TIMESCALE FOR DELIVERY
March 2023

**OUTPUTS AND MILESTONES**Best practice examples identified

### **ACTIONS**

Work with the East Lancashire Chamber of Commerce Low Carbon Technologies Business Support and Skills Academy to promote carbon reduction operations and initiatives

WHO WILL LEAD ON THIS ACTION? Economy and Growth

TIMESCALE FOR DELIVERY March 2024

**OUTPUTS AND MILESTONES**Best practice examples identified

### **ACTIONS**

Work with Growth Lancashire to deliver a grant programme to incentivise investment in low energy equipment

WHO WILL LEAD ON THIS ACTION? Economy and Growth

TIMESCALE FOR DELIVERY
March 2024

### **OUTPUTS AND MILESTONES**

Grant programme fully allocated with examples of best practice identified

## Objective 3A - reduce energy use in construction, manufacturing, and business operations

i - encourage and promote the use of low energy equipment and materials

#### **ACTIONS**

Encourage and support the reuse of existing buildings to accommodate new residential and employment uses

WHO WILL LEAD ON THIS ACTION?
Planning Services/Economy and
Growth

TIMESCALE FOR DELIVERY Ongoing

#### **ACTIONS**

Support and encourage the reuse of demolition material through local plan policies

WHO WILL LEAD ON THIS ACTION?
Planning Services/Economy and
Growth

TIMESCALE FOR DELIVERY Ongoing

### Objective 3A - reduce energy use in construction, manufacturing, and business operations

ii - maximise the number of empty homes brought back in to use

#### **ACTIONS**

Return a minimum of 90 empty homes back in to use through direct intervention from the Council

WHO WILL LEAD ON THIS ACTION? Housing Services

TIMESCALE FOR DELIVERY Ongoing

OUTPUTS AND MILESTONES

Number of homes brought back in to use – target 90 per year

#### **ACTIONS**

Work with Calico to deliver future phases of their empty homes programme assisting with communication and compulsory purchase.

WHO WILL LEAD ON THIS ACTION? Housing Services/Registered Providers

TIMESCALE FOR DELIVERY Ongoing

**OUTPUTS AND MILESTONES**Number of homes purchased and renovated each year

### Objective 3B – increase recycling and the use of low embodied energy products

i - ensure high standards of energy efficiency in the Council's purchasing of equipment, materials and services

### **ACTIONS**

Require a carbon reduction statement in all tenders for works above £5,000

WHO WILL LEAD ON THIS ACTION?

Legal and Democracy

TIMESCALE FOR DELIVERY

December 2022

**OUTPUTS AND MILESTONES** 

Tender documents amended and issued as standard

### Objective 3B – increase recycling and the use of low embodied energy products

ii - Promote and facilitate an increase in recycling and reusing of products and materials

#### **ACTIONS**

Carry out a pro-active communications programme for "Reduce, Reuse, Recycle" to positively promote changes in behaviour

WHO WILL LEAD ON THIS ACTION?
Streetscene

TIMESCALE FOR DELIVERY
December 2022

OUTPUTS AND MILESTONES % of waste recycled

### **ACTIONS**

Maximise recycling through the household waste collection service by the introduction of more extra capacity bins

WHO WILL LEAD ON THIS ACTION?
Streetscene

TIMESCALE FOR DELIVERY Ongoing

OUTPUTS AND MILESTONES
Monitor the increase in the provision of larger recycling bins.
% of waste recycled

### **ACTIONS**

Review leisure centres and sports facilities to assess options for improved recycling facilities

WHO WILL LEAD ON THIS ACTION?
Burnley Leisure

TIMESCALE FOR DELIVERY March 2023

**OUTPUTS AND MILESTONES**More recycled material introduced into business operations

# **Theme 4 - Renewable energy**

### **Objective 4 - increase renewable energy capacity and provision**

i - support and encourage renewable energy provision

### **ACTIONS**

Implement Local Plan policies supporting renewable energy provision in new development and supporting stand-alone new renewable energy infrastructure

WHO WILL LEAD ON THIS ACTION? Planning Services

TIMESCALE FOR DELIVERY Ongoing

OUTPUTS AND MILESTONES Number of renewable energy schemes with approval

# **Theme 4 - Renewable energy**

## **Objective 4 - increase renewable energy capacity and provision**

ii - include renewable energy provision in council funded or supported projects

### **ACTIONS**

Introduce climate change actions as a standing item at all future partnership board meetings with the waste contract provider

WHO WILL LEAD ON THIS ACTION? Streetscene

TIMESCALE FOR DELIVERY July 2022

**OUTPUTS AND MILESTONES**Recorded as a standing item on all agendas

### **ACTIONS**

Review the specification for the renovation of empty homes to assess the options for including renewable energy products

WHO WILL LEAD ON THIS ACTION? Housing Services

TIMESCALE FOR DELIVERY April 2022

**OUTPUTS AND MILESTONES**Specification reviewed and updated as appropriate

# **Theme 4 - Renewable energy**

### Objective 4 - increase renewable energy capacity and provision

iii - work in partnership with housing providers and landlords to introduce renewable energy in their existing dwellings

**ACTIONS** 

Seek funding opportunities through Government grant programmes

WHO WILL LEAD ON THIS ACTION? Housing Services

TIMESCALE FOR DELIVERY Ongoing

OUTPUTS AND MILESTONES
Number of properties with

renewable energy products installed

## Objective 5 – protect and increase trees, woodland, meadowland and habitats

i - protect trees on development sites or where appropriate require replacement

**ACTIONS** 

Implement Local Plan protected identified open space Policy NE2 and specific trees Policy NE4

WHO WILL LEAD ON THIS ACTION? Planning Service

TIMESCALE FOR DELIVERY Ongoing

**ACTIONS** 

Introduced new tree preservation orders for suitable trees

WHO WILL LEAD ON THIS ACTION? Planning Service

TIMESCALE FOR DELIVERY
Ongoing

OUTPUTS AND MILESTONES Number of additional tree preservation orders issued

### Objective 5 - protect and increase trees, woodland, meadowland and habitats

ii - maintain trees on council land

**ACTIONS** 

The Council to implement the Tree Management Policy

WHO WILL LEAD ON THIS ACTION? Green Spaces and Amenities

TIMESCALE FOR DELIVERY Ongoing

**OUTPUTS AND MILESTONES**Policy implemented, reviewed and adapted

## Objective 5 – protect and increase trees, woodland, meadowland and habitats

iii protect designated sites, and maintain priority habitats and ecological networks

ACTIONS
Implement Local Plan Policy NE1

WHO WILL LEAD ON THIS ACTION? Planning Service

TIMESCALE FOR DELIVERY Ongoing

### **OUTPUTS AND MILESTONES**

No development approved within or adversely affecting the integrity of national or international sites of county level biological heritage sites. Presence of ecological networks, priority habitats and protected species appropriately addressed in all planning approvals

**ACTIONS** 

Implement new biodiversity duties in 2021 Environment Acts

WHO WILL LEAD ON THIS ACTION?
All Units

TIMESCALE FOR DELIVERY
Relevant provisions of Act not yet in

force – expected winter 2023

**OUTPUTS AND MILESTONES** 

Statutory net gain for biodiversity incorporated into approvals from 2023/4

### Objective 5 - protect and increase trees, woodland, meadowland and habitats

iv - require planting of new trees and shrubs on land not in Council ownership

### **ACTIONS**

Work with partners to implement the Pennine Lancashire Treescope programme (PLanT)

WHO WILL LEAD ON THIS ACTION?
Green Spaces and Amenities

TIMESCALE FOR DELIVERY September 2022

**OUTPUTS AND MILESTONES**By September 2022 16,000 trees planted

### **ACTIONS**

Work with partner to progress the Community Forest initiative and encourage tree planting on private owned land

WHO WILL LEAD ON THIS ACTION? Green Spaces and Amenities

TIMESCALE FOR DELIVERY Ongoing

OUTPUTS AND MILESTONES % of the borough with tree cover

### **ACTIONS**

Implement planning policies requiring landscaping schemes, new and replacement trees and planting to mitigate against vehicle emissions and other pollutant

WHO WILL LEAD ON THIS ACTION? Planning Service

TIMESCALE FOR DELIVERY Ongoing

### **ACTIONS**

Work with the Ribble Rivers Trust to facilitate more tree planting along riverbanks

WHO WILL LEAD ON THIS ACTION? Green Spaces and Amenities

TIMESCALE FOR DELIVERY March 2026

OUTPUTS AND MILESTONES % of the borough with tree cover

### Objective 5 – protect and increase trees, woodland, meadowland and habitats

v – plant new trees and increase wildflower meadows across the borough

**ACTIONS** 

Review and implement the Council's rethinking Parks Programme

WHO WILL LEAD ON THIS ACTION? Green Spaces and Amenities

TIMESCALE FOR DELIVERY March 2026 **ACTIONS** 

Continue to progress the Council's Meadow Management Programme to increase the areas covered by meadowland and semi natural environments to reduce the need for grass cutting

WHO WILL LEAD ON THIS ACTION?
Green Spaces and Amenities

TIMESCALE FOR DELIVERY March 2026

OUTPUTS AND MILESTONES % of meadowland monitored and increased

**ACTIONS** 

Introduce sustainable forms of floral displays reducing the need for intensive management

WHO WILL LEAD ON THIS ACTION?
Green Spaces and Amenities

TIMESCALE FOR DELIVERY Ongoing

**OUTPUTS AND MILESTONES** Number of displays introduced

## Objective 5 – protect and increase trees, woodland, meadowland and habitats

vii - protect species, priority habitats and wider biodiversity

### **ACTIONS**

Protect habitats where possible and ensure that suitable sites are provided for habitat off sets where development results in habitat loss

WHO WILL LEAD ON THIS ACTION?
Planning Services/Green Spaces and
Amenities

TIMESCALE FOR DELIVERY Ongoing

OUTPUTS AND MILESTONES
Record net gain as part of the 2021
Environment Act duties (from 2024)

## **Theme 6 - Flood Risk**

### Objective 6A - limit the impacts of flood risk on and from new development

i - require new developments to be safe from flooding and to not cause or exacerbate flooding issues elsewhere

**ACTIONS** 

Implement Local Plan policies requiring and supporting the provision of Sustainable Urban Drainage Systems

WHO WILL LEAD ON THIS ACTION? Planning Services

TIMESCALE FOR DELIVERY
Ongoing

ACTIONS

Maintain and update strategic flood risk assessments as necessary

WHO WILL LEAD ON THIS ACTION? Planning Services

TIMESCALE FOR DELIVERY Ongoing

## Theme 6 - Flood Risk

### Objective 6B - protect existing properties and infrastructure from flooding and improve resilience

i - protect existing properties from current and future flood risk

#### **ACTIONS**

Support and implement schemes which protect and prepare existing properties for current and future flood risk

WHO WILL LEAD ON THIS ACTION? Economy and Growth/Housing Services

TIMESCALE FOR DELIVERY Ongoing

OUTPUTS AND MILESTONES
Action Government schemes as they are made available

### **ACTIONS**

Support businesses at risk of flooding to implement strategies and technologies to protect their properties

WHO WILL LEAD ON THIS ACTION? Economy and Growth/Housing Services

TIMESCALE FOR DELIVERY Ongoing

OUTPUTS AND MILESTONES
Action Government schemes as they are made available

### **ACTIONS**

Encourage greater sign up to Flood Alerts and Emergency Weather Notifications

WHO WILL LEAD ON THIS ACTION? Policy and Engagement

TIMESCALE FOR DELIVERY
Ongoing with annual review

OUTPUTS AND MILESTONES
More households and businesses
engaged

### **ACTIONS**

Improve and keep under review information available on the Council's website and social media platforms

WHO WILL LEAD ON THIS ACTION? Policy and Engagement

TIMESCALE FOR DELIVERY
December 2022 – annual review

**OUTPUTS AND MILESTONES**Website updated with annual review undertaken

## **Theme 6 - Flood Risk**

## Objective 6B - protect existing properties and infrastructure from flooding and improve resilience

ii – ensure the Council and partners have an effective emergency planning response

### **ACTIONS**

Keep emergency plan under review to ensure it remains flexible to the potential challenges faced by climate change and maximise its effectiveness when deployed

WHO WILL LEAD ON THIS ACTION? Streetscene

TIMESCALE FOR DELIVERY Ongoing

**OUTPUTS AND MILESTONES** Annual review undertaken

# Theme 7 - Communication and stakeholder engagement

## **Objective 7A – adopt an effective communications strategy**

i – Develop a communications plan

### **ACTIONS**

**Develop a Climate Emergency Communications Plan** to provide information and advice to residents, businesses and stakeholders

WHO WILL LEAD ON THIS ACTION?
Policy and Engagement

TIMESCALE FOR DELIVERY
December 2022

**OUTPUTS AND MILESTONES**Plan developed and adopted

# Theme 7 – Communication and stakeholder engagement

### **Objective 7B – engage with stakeholders**

ii – engage young people

**ACTIONS** 

Devise a programme of engagement with the Burnley Youth Forum to establish long term engagement with young people

WHO WILL LEAD ON THIS ACTION?
Policy and Engagement

TIMESCALE FOR DELIVERY

December 2022

**ACTIONS** 

Explore the opportunities to work with schools and educational facilities on promote climate change messages

WHO WILL LEAD ON THIS ACTION? Policy and Engagement

TIMESCALE FOR DELIVERY Ongoing

# Theme 7 – Communication and stakeholder engagement

### **Objective 7B – engage with stakeholders**

iii - promote best practice and innovation

**ACTIONS** 

Seek opportunities through the Council's work programme to promote climate change awareness and promote best practice

WHO WILL LEAD ON THIS ACTION?

Policy and Engagement

TIMESCALE FOR DELIVERY

Ongoing

**ACTIONS** 

Work with Burnley Bondholders to promote examples of low carbon business operations and the development of innovative technologies

WHO WILL LEAD ON THIS ACTION?

Economy and Growth

TIMESCALE FOR DELIVERY

Ongoing

# Theme 7 - Communication and stakeholder engagement

## **Objective 7B – engage with stakeholders**

iv – Influence Government and other key organisations to support our ambitions

#### **ACTIONS**

Lobby Government where possible to provide the necessary statutory support and financial resources to implement the Climate Change Strategy

WHO WILL LEAD ON THIS ACTION?
All units

TIMESCALE FOR DELIVERY Ongoing

OUTPUTS AND MILESTONES
Level of resources secured

### **ACTIONS**

Develop a programme of engagement with key stakeholders to establish and build on existing partnerships

WHO WILL LEAD ON THIS ACTION?
Policy and Engagement

TIMESCALE FOR DELIVERY Ongoing

**OUTPUTS AND MILESTONES**Number of active partnerships

## 7. References and End notes

<sup>1</sup>http://www.legislation.gov.uk/ uksi/2019/1056/contents/made

<sup>2</sup> The Ten Point Plan for a Green Industrial Revolution

<sup>3</sup>Government takes historic step towards net-zero with end of sale of new petrol and diesel cars by 2030 -GOV.UK (Error! Hyperlink reference not valid.)

<sup>4</sup>The Amendment Regulations were introduced on 15 Dec 2021 and come into force on 15 June 2022. However, the Amendment Regulations will not apply in relation to building work where a building notice or an initial notice has been given to, or full plans deposited with, a local authority before 15 June 2022 provided that the building work is started before 15 June 2023.

Infrastructure for charging electric vehicles: Approved Document S - GOV.UK (www.gov. uk)

<sup>5</sup>The Amendment Regulations were introduced on 15 Dec 2021 and come into force on 15 June 2022. However, the Amendment Regulations will not apply in relation to building work on a building where a building notice or an initial notice has been given to, or full plans deposited with, a local authority before 15 June 2022 provided that the building work on that particular building is started before 15 June 2023.

Any plans or notices submitted after June 2022 must adhere to the new Part L standards. Approved Documents - GOV.UK (www.gov.uk)

<sup>6</sup>Heat and buildings strategy (publishing.service.gov.uk)

<sup>7</sup>National planning policy is set out in the National Planning Policy Framework and a number of documents Written Ministerial Statements.

<sup>8</sup>Section 19 (1A) of the Planning and Compulsory Purchase Act 2004

<sup>9</sup>Net Zero Strategy: Build Back Greener - October 2021 (publishing.service.gov.uk)

<sup>10</sup>Burnley's local plan was written to be consistent with the 2012 version of the NPPF; the most recent version was issued in 2021

<sup>11</sup>Planning for the future white paper (publishing.service.gov.uk)

<sup>12</sup>Housing minister Christopher Pincher 18 November 2021 at the annual Planning For Housing conference

<sup>13</sup>Residential development schemes over 10 dwellings- 1 off-street charging point per detached dwelling.

Non-Residential developments 20-50 spaces- 1 bay with charging point for use by electric vehicles only. >50 spaces: Minimum 2 bays with charging points for use by electric vehicles only.

Additional provision is required where local air quality issues have been identified.

