

North Yorkshire Council

Environment Directorate

Executive Members

27 September 2024

Beyond Carbon Pump Priming Budget

Report of the Climate Change Strategy Manager

1.0 PURPOSE OF REPORT

- 1.1 To note Beyond Carbon (BC) Budget allocation to date
- 1.2 To provide detail on the current bids to the Beyond Carbon Budget
- 1.3 To seek consultee Members' views on the use of the fund

2.0 BACKGROUND

- 2.1 Members previously allocated £1 million revenue to support delivery of the NYCC Carbon Reduction Plan for Officers to 'bid' to internally. Of this, £282,441 remains currently unallocated.
- 2.2 In line with the terms of reference and governance of the Beyond Carbon funding allocation. Officers make bids to the fund with project proposals which seek to support operational greenhouse gas reduction. To date:
 - 13 projects have already been approved, totalling £717,559.
 - Two projects are pending approval, totalling £120,000. If approved, the remaining available funding would equate to £162,441

3.0 REPORT

- 3.1 The budget position is set out in appendix A. As previously detailed, to date, £717,559 has been allocated.
- 3.2 The two proposals for consideration are detailed in Appendix B.
 - i. **Property Decarbonisation Surveys Pump Priming fund:** This is to support the completion of 20 decarbonisation reports for North Yorkshire Council (NYC) properties. The purpose of this would be to assess and explore potential opportunities for decarbonisation and energy saving works on each site. Following any works highlighted and commissioned, potential savings would be re-invested into commissioning further surveys in a partial pump-priming model. Future opportunities for utilisation of these decarbonisation reports include information and prioritising future investment in capital works/maintenance as well as developing open ready proposals which could be used to apply for external funding opportunities e.g Public Sector Decarbonisation Scheme or Y&NYCA's Carbon Negative Challenge Fund.

- ii. **County Hall Geothermal heating feasibility:** The boilers at County Hall are end of life, various solutions have been proposed from replacing like-for-like, to considering hybrid air source or ground source heat pumps. Without providing a boost facility traditional heat pumps cannot provide the temperatures required to allow the existing heating infrastructure to run efficiently, given the heritage and listed status of the building an upgrade of infrastructure would be challenging and there is a limited capacity to the incoming power supply to consider.

This study would look at and innovative alternative solution based on a geothermal solution for heat, utilising a closed loop mono-bore deep well. Although the study would be commissioned for this individual building, it will also indicate the potential for use with other property assets and be the basis for developing business cases for funding.

4.0 CONSULTATION

- 4.1 Feedback and comments on the bids has been sought from the Beyond Carbon Officer Group.
- 4.2 The decision will be made by the Assistant Director - Environmental Services and Climate Change, in accordance with the delegation from the Corporate Director of Environment contained within the Scheme of Sub-Delegation (to be exercised in accordance with the Financial Procedure Rules).

5.0 CONTRIBUTION TO COUNCIL PRIORITIES

- 5.1 Council Plan: A carbon neutral council
- 5.2 North Yorkshire Council Climate Change Strategy: As a Council we will seek to become operationally net zero by 2030.

6.0 ALTERNATIVE OPTIONS CONSIDERED

- 6.1 Bids are submitted to the Beyond Carbon Pump Priming budget following an agreed process. Therefore, no alternative options were considered.

7.0 FINANCIAL IMPLICATIONS

- 7.1 £1 million was set aside to establish the Beyond Carbon Pump Priming budget as part of the 2021/22 NYCC budget. The funding is one-off revenue funding.
- 7.2 To date, £717,559 has been allocated (as indicated in 3.1 above) which leaves £282,441 remaining. If the contents of this report are approved, an additional £120,000 will be allocated, leaving £162,441 remaining.

8.0 LEGAL IMPLICATIONS

- 8.1 The decision is made by the Assistant Director of Environmental Services and Climate Change, in accordance with the delegation from the Corporate Director of Environment contained within the Scheme of Sub-Delegation (to be exercised in accordance with the Financial Procedure Rules).
- 8.2 All activities are delivered by the Council and will utilise agreed project management protocols.

8.3 Any contracts entered into will be prepared or fully reviewed by the Council's Legal Services and will be in accordance with both the Council's Financial Procedure Rules and Procurement and Contract Procedure Rules. If relevant, contracts will also comply with the Public Contracts Regulations 2015 and any other legislation.

9.0 EQUALITIES IMPLICATIONS

9.1 There are no anticipated equalities implications. An Equalities Impact Assessment Screening report is attached at Appendix C.

10.0 CLIMATE CHANGE IMPLICATIONS

10.1 The purpose of the Beyond Carbon Pump Priming Budget is to fund activities which reduce greenhouse gas emissions. All activities are therefore designed to reduce greenhouse gas emissions and mitigate climate change. A Climate Change Impact Assessment is at Appendix D.

11.0 REASON FOR RECOMMENDATIONS

11.0 The recommendations will contribute towards the Council's ambition to be carbon neutral by 2030.

12.0 RECOMMENDATIONS

12.1 That the budget position is noted.

12.2 That the Assistant Director - Environmental Services and Climate Change (under the Scheme of Delegation), in consultation with the Executive Member for Managing our Environment and the Executive Member for Finance and Resources, approves the proposed bids.

APPENDICES:

Appendix A – Budgetary Position

Appendix B – Bids to the Beyond Carbon Pump Priming Budget Assessment Screening

Appendix C – Equalities Impact

Appendix D - Climate Change Impact Assessment

Jos Holmes
Climate Change Strategy Manager
County Hall
Northallerton
13 September 2024

Budgetary Position

Bids	Approved	Pending
Climate Change Policy Officer	£115,000	
EV Charging Infrastructure Strategy	£49,950	
NYCC fleet EV Car and Van for services to trial	£45,480	
NYCC fleet 10 EV pool cars	£130,280	
EV home charge point for care and support staff	£15,000	
EV Van Trial for SMEs		
County Hall EVCPs	£90,000	
NYCC Supply Chain engagement	£22,000	
Communications and engagement	£14,100	
Landuse Options	£50,000	
UK Subsidy Control Regime for DDNZF bids	£6,500	
Ryedale Off Road Charging Scheme match funding	£39,249	
Pickering Vivis Lane Rapid Chargers	£	
Leisure Centre Decarbonisation Plans	£80,000	
Social Housing Decarbonisation Plans		
Fleet Decarbonisation review	£60,000	
Property decarbonisation surveys pump priming fund		£80,000
County Hall Geothermal heating feasibility		£40,000
Total Allocated / pending	£717,559	£120,000
Total Remaining	£282,441	£162,441

Beyond Carbon Funding Proposal – Property Decarbonisation Surveys

Project / Programme overview			
1. Project Name	Property Decarbonisation Surveys	2. Project Sponsor	Daniel McDermott
3. Directorate/Service Area	Resources – SMCPP – Strategic Property	4. Project Lead	Kirsty Gale
5. Carbon reduction result area(s) – indicate all that apply	a) Property, buildings, fixed appliances		
6. Other Climate result area(s)	a) Increased resilience of people, communities and regions b) Increased resilience of infrastructure, food and water supply c) Awareness, communication and education		
7. Expected tonnes of carbon dioxide equivalent (t CO₂ eq) to be reduced or avoided over lifespan of project	Not applicable as commissioning decarbonisation reports. The output of the decarbonisation reports can lead to carbon emission reductions following carrying out/completion of works outlined		
8. Project funding requested	£80k	9. Total project cost	£80k
10. Investment cost per t CO₂eq (investment cost / expected emission reduction)	NA – please see box 7.		
10. Project / Programme Implementation Period	2024/2025	11. Total lifespan (impacts of investment)	Initial decarbonisation reports followed by potential pump priming. Money saved associated with energy use reduction can be used to fund further decarbonisation surveys.

Executive summary

This proposed funding request would be to commission and carry out up to 20 decarbonisation reports on a number of North Yorkshire Council (NYC) properties. These decarbonisation reports will assess the building holistically, assessing the building and site in its entirety. The purpose of this would be to assess and explore potential opportunities for decarbonisation and works on a site. Following any works highlighted and commissioned, potential savings would be re-invested into commissioning further surveys in a partial pump-priming model. Initial properties to commission these reports for will be decided on a case by case basis, but will include NYC owned properties who are utilising fossil fuel heating and are in the top 100 for energy use (using FY24 energy usage figures).

NYC have an array of building types as part of its property portfolio of varying ages, uses and locations. Current energy usage across the NYC portfolio (for where NYC pay the bill) for FY24 was 42,828,130kWh for building heating and 31,735,683kWh for electricity (both building and streetlighting). Combined this energy usage realises carbon emissions of 14,534.12tonnes CO₂e – 68% of NYC's total Scope 1 and 2 emissions.

Assessing for potential decarbonisation opportunities not only reduces emissions but has the potential to reduce the operating cost of buildings. Reducing energy usage will reduce the overall cost of energy bills and will also reduce our potential exposure to the Voluntary Carbon Market; if it is decided that NYC are going to purchase offsets to achieve Net Zero – it should be stressed that offsetting should be used as a last resort. For every tonne of carbon emissions reduced, this equates to a tonne less of exposure, with offsets currently costing between £25-60.

As property is responsible for large proportion of NYC's operational emissions, and NYC have an announced target to have Net Zero Operational Emissions by 2030, it is imperative that we begin to assess and look for potential to reduce emissions associated with property operations.

Climate Context

Commissioning decarbonisation reports which assess a site in a holistic manner can help to assess for the potential reduction in gas and electric consumption, potential for renewable energy projects and making NYC buildings a better place to work for people who utilise the space.

Exploring a phased approach of carrying out decarbonisation reports for the NYC property portfolio will allow for a pump priming investment model to be explored, whereby funding is invested in decarbonisation efforts which realises a future monetary saving, which can then be reinvested into decarbonisation.

Decarbonisation efforts, such as reducing exposure the volatile gas, electric and voluntary carbon markets also reduces potential future financial and political risk. As it can help to reduce our reliance on grid energy, and therefore prices, and will bring us closer to meeting NYC's net zero operational emissions by 2030 target.

Project / Programme description

The project will be to commission up to 20 holistic decarbonisation reports for buildings owned by NYC, using fossil heating (such as kerosene and gas) and within the top 100 highest emitting buildings – using energy consumption from FY24.

The reports should explore:

- Current energy usage on site

- No regret measures (Measures taken which do not worsen vulnerabilities or which increase the adaptive capabilities of a building or area to climate change without need for a business case)
- Short (delivery within 1 year), Medium (delivery within 5yrs) and Long term (delivery 5+yrs)
- Projected costings for all measures
- Projected savings for all measures

Following decarbonisation reports, assess each property on its merits. Create business cases for works where needed and inform facilities managers of changes in business as usual. Ensure to track the impact of any changes made – both financial savings and carbon emission reduction. Financial savings can then be used to fund further decarbonisation reports and projects.

Implementation arrangements

This initial fund is to undertake holistic decarbonisation reports to allow for business cases and changes to business as usual for facilities managers. APP can be commissioned to carry out the decarbonisation reports, following a detailed brief of what is required to be included in the decarbonisation reports to ensure best value for money or delivery of objectives.

Impacts, Outcomes and performance indicators

Expected Impact / Outcome / Result	Indicator	Means of Verification	Baseline	Target	Assumptions
Decarbonisation reports for high energy use buildings	Affordability Carbon reduction	Financial model Emission reporting	Current utility cost & carbon output	Minimise carbon emissions, Pump prime for further investment	Proposed works carried out following business case, Some of financial saving reinvested into further decarbonisation works
Business cases for decarbonisation works	Affordability Social value	Financial model Emission reporting	Current utility cost & carbon output	Reduce emissions Reduce cost of running buildings	Potential savings used to fund further decarbonisation works

Activity	Description	Sub-activities	Deliverables
Decarbonisation reports commissioned	Partner company to deliver all reports	Example of what required, Access data, Review reports and feedback.	Decarbonisation reports
Implementation of 'no regret measures'	Explore changes to business as usual with no cost	Monitor impact	Emission and cost savings associated
Business cases for decarbonisation works	PSDF bid etc.	Broader opportunities for properties	Possible support for funding model Impact on estate plan

Activities

Timelines and milestones – including critical start / end dates

Milestone	Expected Date	Why is this key? (e.g. legal, funding, contract)
List of potential properties	End of September 2024	Need agreed list before commissioning partner
Decarbonisation reports complete	End of March 2025	Potential PSDF round September 2025 Buildings should be available for access as fewer events etc
Business cases	End of October 2025	Business case developed for each building with proposed works by

High level Risks

Are there any high level risks that are apparent at this stage, including risks if the project is not delivered and any known risk of undertaking the project?

Risk Description & Consequence
Council Reputation – if don't reduce emissions to minimum
Finance – need to ensure business cases make sense from financial and carbon perspective

Approvals

Confirm below that the submission has been agreed by the following:

Sponsor		
Dan McDermott	D. McDermott	23/08/2024

Beyond Carbon Funding Proposal – County Hall Boiler Replacement

Project / Programme overview			
1. Project Name	County Hall Geothermal heating feasibility	2. Project Sponsor	Daniel McDermott
3. Directorate/Service Area	Resources – SMCPP – Strategic Property	4. Project Lead	Christopher Davies
5. Carbon reduction result area(s) – indicate all that apply	a) Property, buildings, fixed appliances		
6. Other Climate result area(s)	a) Increased resilience of infrastructure, food and water supply b) c) Awareness, communication and education		
7. Expected tonnes of carbon dioxide equivalent (t CO₂ eq) to be reduced or avoided over lifespan of project	(1,320,371 kWh total Gas consumption x 0.4/0.6 Kg CO ₂ /kWh) 0.4= 660185.50 kg (660 Metric Tonnes) or 0.6= 792,222.6 Kg (792 Metric Tonnes)		
8. Project funding requested	£40k	9. Total project cost	c£2m Budget Estimate
10. Investment cost per t CO₂eq (investment cost / expected emission reduction)	= value from box 8 / value from box 7 £60.1 / tonne (based on 0.4kg CO ₂ /kWh) for the feasibility		
10. Project / Programme Implementation Period	2025/26	11. Total lifespan (impacts of investment)	50-years until well needs re-lining. Moving parts would be 15-25years and incorporated into CapEx

Executive summary

The boilers at County Hall are end of life, various solutions have been proposed from replacing like-for-like, to considering hybrid air source or ground source heat pumps. Without providing a boost facility traditional heat pumps cannot provide the temperatures required to allow the existing heating infrastructure to run efficiently, given the heritage and listed status of the building an upgrade of infrastructure would be challenging and there is a limited capacity to the incoming power supply to consider.

The Council was approached by CeraPhi Energy early 2024 presenting an initial study which considers an alternative solution based on their proprietary CeraPhiWell technology. This presents a geothermal solution for heat, utilising a closed loop mono-bore deep well. The initial study looked at boreholes at 1,500m and 2,000m bringing temperatures up to 55°C which would still need to be boosted to the required temperature of 80°C. A further initial study has been requested to consider a deeper well to provide the required 80°C temperatures without the need for any additional boost.

The next round of Public Sector Decarbonisation Funding (PSDF) is due to be announced over the summer, we are seeking £40k funding to undertake the next stage feasibility work which can then be used to support the next NYC PSDF bid. It is anticipated that the elements of the previous bid will also be included and can only be further supported by this significant opportunity.

Subject to the feasibility, whatever the outcome of the PSDF funding bid, a case will still need be developed to bring forward a solution for the boiler replacement at County Hall.

Please note this is not a heat and power solution as may be traditionally associated with geothermal energy.

Climate Context

This solution would remove the gas consumption associated with space and water heating for the County Hall Campus.

This would be a pioneer project working with CeraPhi Energy and has the potential to be a proof of concept for all major North Yorkshire Council assets. It also presents the opportunity to branch out each individual solution to provide localised heat networks for key partners or even domestic use (possible commercialisation opportunity).

It could further put NYC on the map; leading a new approach to decarbonisation of the public estate, and providing a level of control and mitigation away from the volatile gas market.

Project / Programme description

Implementation arrangements

Describe the project/programme implementation structure, outlining legal, contractual, institutional and financial arrangements where applicable, considering involvement of any third parties and beneficiaries. Provide information on governance arrangements (boards, consultation groups etc) and any financial arrangements.

This initial case is to undertake the further feasibility allowing a capital business case to be developed. Initial procurement advice has been sought, and as the initial value is under £50k we

can use the Best Value route and seek to directly award the commission. As part of the feasibility, working with CeraPhi Energy, the key stakeholders will be engaged and consulted on the solutions for boiler replacement.

Impacts, Outcomes and performance indicators

Expected Impact / Outcome / Result	Indicator	Means of Verification	Baseline	Target	Assumptions
Feasibility Study	Affordability	Financial model & sufficient heat output	Current utility cost & carbon output	Feasible option for cost & carbon reduction	Straightforward installation & interface with existing heating infrastructure.
Initial stakeholder buy-in	Positive reception of concept	Support for the concept – briefing note	N/A	Positive feedback	Resistance re disruption, listed building, education of tech

Activities

Activity	Description	Sub-activities	Deliverables
Feasibility Study	CeraPhi scope of work	Access to data	Supporting information for bid
Stakeholder buy-in	Briefing note and engagement sessions	Identify stakeholders	
Funding opportunities	PSDF bid etc.	Broader opportunities	Possible support for funding model

Timelines and milestones – including critical start / end dates

Milestone	Expected Date	Why is this key? (e.g. legal, funding, contract)
Commission Feasibility (subject to funding)	End of June 2024	We need to get the feasibility done to support a PSDF bid.
Feasibility completion	End of August 2024	Anticipated PSDF round September 2024
Business case	2024/25 Q3	Full case with recommended solution for boiler replacement – target replacement within 2025/26.

High level Risks

Are there any high level risks that are apparent at this stage, including risks if the project is not delivered and any known risk of undertaking the project?

Risk Description & Consequence
Council Reputation – propriety tech – disruption during construction – positive proof of concept
Back up heating source – possible solution for the estate required anyway (i.e. mobile temporary boiler)
Finance – financial modelling principles to be designed with strategic finance There are clear risks associated with proprietary tech, this feasibility study allows the solution to be further

investigated alongside the existing work which has been undertaken to consider the right solution for replacing the boiler at County Hall.

Approvals

Confirm below that the submission has been agreed by the following:

Sponsor		
Dan McDermott	D. McDermott	14/06/2024

Initial equality impact assessment screening form This form records an equality screening process to determine the relevance of equality to a proposal, and a decision whether or not a full EIA would be appropriate or proportionate.			
Directorate	Environment		
Service area	Environmental Services		
Proposal being screened	Beyond Carbon Pump Priming Budget Review of Funding Bid		
Officer(s) carrying out screening	Jos Holmes		
What are you proposing to do?	Two property decarbonisation studies		
Why are you proposing this? What are the desired outcomes?	To tackle the causes of climate change.		
Does the proposal involve a significant commitment or removal of resources? Please give details.	It seeks internal funding to implement the projects.		
Impact on people with any of the following protected characteristics as defined by the Equality Act 2010, or NYCC's additional agreed characteristics As part of this assessment, please consider the following questions:			
<ul style="list-style-type: none"> To what extent is this service used by particular groups of people with protected characteristics? Does the proposal relate to functions that previous consultation has identified as important? Do different groups have different needs or experiences in the area the proposal relates to? 			
If for any characteristic it is considered that there is likely to be an adverse impact or you have ticked 'Don't know/no info available', then a full EIA should be carried out where this is proportionate. You are advised to speak to your Equality rep for advice if you are in any doubt.			
Protected characteristic	Potential for adverse impact		Don't know/No info available
	Yes	No	
Age		X	
Disability		X	
Sex		X	
Race		X	
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage or civil partnership		X	
People in rural areas		X	
People on a low income		X	
Carer (unpaid family or friend)		X	
Does the proposal relate to an area where there are known inequalities/probable impacts (e.g. disabled people's access to public transport)? Please give details.	No.		

<p>Will the proposal have a significant effect on how other organisations operate? (e.g. partners, funding criteria, etc.). Do any of these organisations support people with protected characteristics? Please explain why you have reached this conclusion.</p>	No			
<p>Decision (Please tick one option)</p>	EIA not relevant or proportionate:	X	Continue to full EIA:	
<p>Reason for decision</p>	There are no adverse impacts anticipated.			
<p>Signed (Assistant Director or equivalent)</p>	Michael Leah			
<p>Date</p>	13.09.2024			

Climate change impact assessment

The purpose of this assessment is to help us understand the likely impacts of our decisions on the environment of North Yorkshire and on our aspiration to achieve net carbon neutrality by 2030, or as close to that date as possible. The intention is to mitigate negative effects and identify projects which will have positive effects.

This document should be completed in consultation with the supporting guidance. The final document will be published as part of the decision making process and should be written in Plain English.

If you have any additional queries which are not covered by the guidance please email beyond.carbon@northyorks.gov.uk

Please note: You may not need to undertake this assessment if your proposal will be subject to any of the following:

Planning Permission
Environmental Impact Assessment
Strategic Environmental Assessment

However, you will still need to summarise your findings in the summary section of the form below.

Please contact beyond.carbon@northyorks.gov.uk for advice.

Title of proposal	Beyond Carbon Pump Priming Budget Review of Funding Bids
Brief description of proposal	Two property decarbonisation studies
Directorate	Environment
Service area	Climate Change
Lead officer	Jos Holmes
Names and roles of other people involved in carrying out the impact assessment	Jos Holmes, Climate Change Strategy Manager
Date impact assessment started	06.09.24

Options appraisal

Were any other options considered in trying to achieve the aim of this project? If so, please give brief details and explain why alternative options were not progressed.

Bids are submitted to the Beyond Carbon Pump Priming budget following an agreed process. Therefore, no alternative options were considered.

What impact will this proposal have on council budgets? Will it be cost neutral, have increased cost or reduce costs?

Please explain briefly why this will be the result, detailing estimated savings or costs where this is possible.

The property decarbonisation projects will highlight energy saving activity required and therefore, if implemented, will create an operational saving on energy costs.

<p>How will this proposal impact on the environment?</p> <p>N.B. There may be short term negative impact and longer term positive impact. Please include all potential impacts over the lifetime of a project and provide an explanation.</p>	<p>Positive impact (Place a X in the box below where relevant)</p>	<p>No impact (Place a X in the box below where relevant)</p>	<p>Negative impact (Place a X in the box below where relevant)</p>	<p>Explain why will it have this effect and over what timescale?</p> <p>Where possible/relevant please include:</p> <ul style="list-style-type: none"> • Changes over and above business as usual • Evidence or measurement of effect • Figures for CO₂e • Links to relevant documents 	<p>Explain how you plan to mitigate any negative impacts.</p>	<p>Explain how you plan to improve any positive outcomes as far as possible.</p>	
<p>Minimise greenhouse gas emissions e.g. reducing emissions from travel, increasing energy efficiencies etc.</p>	Emissions from travel						
	Emissions from construction						
	Emissions from running of buildings	X			<p>The property decarbonisation projects will highlight energy saving activity required and therefore, if implemented, will create an operational saving on energy costs.</p>		
	Emissions from data storage						
	Other						
<p>Minimise waste: Reduce, reuse, recycle and compost e.g. reducing use of single use plastic</p>							
<p>Reduce water consumption</p>							

<p>How will this proposal impact on the environment?</p> <p>N.B. There may be short term negative impact and longer term positive impact. Please include all potential impacts over the lifetime of a project and provide an explanation.</p>	Positive impact (Place a X in the box below where	No impact (Place a X in the box below where	Negative impact (Place a X in the box below where	<p>Explain why will it have this effect and over what timescale?</p> <p>Where possible/relevant please include:</p> <ul style="list-style-type: none"> Changes over and above business as usual Evidence or measurement of effect Figures for CO₂e Links to relevant documents 	<p>Explain how you plan to mitigate any negative impacts.</p>	<p>Explain how you plan to improve any positive outcomes as far as possible.</p>
Minimise pollution (including air, land, water, light and noise)	x			If implemented, air quality will be improved by the reduction in fossil fuel burning		
Ensure resilience to the effects of climate change e.g. reducing flood risk, mitigating effects of drier, hotter summers	x			If implemented, the decarbonisation audits will also include climate adaptation requirements particularly referencing heating and ventilation		
Enhance conservation and wildlife						
Safeguard the distinctive characteristics, features and special qualities of North Yorkshire's landscape						
Other (please state below)						

Are there any recognised good practice environmental standards in relation to this proposal? If so, please detail how this proposal meets those standards.

Summary Summarise the findings of your impact assessment, including impacts, the recommendation in relation to addressing impacts, including any legal advice, and next steps. This summary should be used as part of the report to the decision maker.

The property decarbonisation projects will support the reduction in energy use and the increase in use of renewable fuels, if findings are implemented.

Sign off section

This climate change impact assessment was completed by:

Name	Jos Holmes
Job title	Climate Change Strategy Manager
Service area	Environmental Services
Directorate	Environment Directorate
Signature	
Completion date	06.09.24

Authorised by relevant Assistant Director (signature): Michael Leah

Date: 13.09.24