

Local urgency on the Climate Emergency?

A review of local authority Climate Emergency Declarations and supporting action across the UK

Executive Summary

This report is the culmination of a nine-month research project carried out by the Environmental Law Foundation (ELF) reviewing the impact of local authorities' Climate Emergency Declarations. The research was conducted via ELF's network of university-based policy clinics with eight universities, plus members of the UK Environmental Law Association (UKELA) Student Working Party, researching the different regions of the UK.

There is no set definition of a Climate Emergency Declaration (CED). Broadly, CEDs are declarations by governments and organisations that humanity is facing a climate emergency, and that urgent action is required to address climate change and its potentially irreversible effects.

Overall, 376 local authorities across the UK were reviewed, identifying that around 79% have made a CED. The South West had the highest percentage of CEDs with the East Midlands the lowest. However, the research also found that most councils without a CED were still taking action to address climate change, although the act of making a CED can help to galvanise action to implement effective change.

On climate change action, local authorities' main areas of focus tend to cover transport, energy, buildings/land use (planning) and waste and the research identified many examples of local authority actions in these areas which will help them move towards their CED ambitions. However, it's also recognised that local authorities have a much wider sphere of influence in effecting change across their communities and they will need to draw on this as the actions necessary involve changes across society.

Effective public engagement will play an important role. However, our research identified that the clarity, accessibility and availability of information on local authority action to address the climate emergency is lacking in many cases. In particular, there is a need for clearly mapped pathways with milestones and monitoring for emission reduction targets. It is clear that local authorities would benefit from assistance in improving the transparency and accessibility of this Information.

So too, with the involvement of local communities. While some local authorities have reached out to and are involving their local communities in the development of their action plans for example, there are many who do not appear to have done so. In turn, this raises questions about how engaged the local community are likely to be with the changes identified, in addition to any formal public participation requirements.

There are also a number of co-benefits from action to address the climate emergency such as improved public health from better air



quality or enhanced biodiversity. Many of these are highlighted by local authorities in their work around CEDs and these too help to broaden public engagement.

However, while this report highlights many examples of positive action by local authorities, it is clear that in many instances the action does not match the rhetoric. In order to meet the urgency of the climate emergency declared by local and national government, there needs to be a step change in the way in which these declarations are treated within their decision-making processes. Without it, there is a risk both that CEDs simply become worthless political statements but, more importantly, that the opportunity for effective action will be missed.

It is clear that central government action around policy and funding to enhance such work is required. ELF hopes that reports such as this help to make the case for such support. We look forward to working with local communities, councils and other stakeholders, to help address the climate emergency.

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Contents

	Executive Summary	2
Α	Introduction	4
В	Methodology	5
С	Climate Emergency Declarations	5
D	Greenhouse Gas Protocol	5
Ε	Areas of focus	6
F	Public Engagement	7
G	Information	8
	a. Locating	8
	b. Obtaining	8
	c. Comparing	9
Н	Decision-making	10
	Co-benefits	10
J	Regional snapshots	11
	East of England	11
	East Midlands	11
	London	12
	North East	12
	North West	13
	South East	13
	South West	13
	West Midlands	13
	Yorkshire & Humber	14
	Northern Ireland	14
	Scotland	14
	Wales	15
K	Observations	15
М	Conclusion	16

A. Introduction

- While climate change impacts are now a regular feature in mainstream media, international concern about the impact of human activities on climate change can be seen as far back as the UN Stockholm Declaration in 1972. Twenty years later, the UN Framework Convention on Climate Change which sought to limit emissions from such activities which interfere with the climate was published at the 1992 Earth Summit in Rio. Lack of progress on this ultimately led to the Paris Agreement in 20151 and the resulting ambition to limit global warming to 1.5°Celsius. Two recent reports from the Intergovernmental Panel on Climate Change (IPCC) highlight the urgent action needed to meet this ambition. The most recent², in August 2021, has been referred to by the UN as a 'code red for humanity'3.
- 2. The Climate Change Act 2008 (CCA), sets out the UK's emission targets and introduced five-yearly carbon budgets to limit emissions. The UK Government recently adjusted the carbon emissions reduction target to 100% by 2050 compared to 1990 levels. The Climate Change Committee (CCC), an independent body established by the CCA to advise the government and parliament, has reported that the UK met the first and second, is on track for the third, but off track for the fourth, fifth and sixth budgets (covering 2023 to 2037)4.
- 3. Both the IPCC and the CCC indicate that the action necessary to address the climate emergency will be across society, not just from central governments. In its December 2020 report, Policies for the Sixth Carbon Budget and Net Zero⁵, the CCC sets out the policy changes required to accelerate a fair and just transition to net zero emissions in the UK. A key element of this is engagement and the CCC highlights the important role played by local authorities. While they are responsible for 2-5% of UK emissions, local authorities' sphere of influence affects 1/3 of local emissions (eg transport, planning, waste). The CCC highlights the importance of public participation, of involving people in decision-making as part of a national conversation, not just trying to persuade them. It should also be at a time when their input is most useful, and in a way that is transparent about how their decisions will influence the action taken. In turn, this builds on Article 12 of the Paris Agreement which recognises the importance of public involvement to enhance the actions required under the Agreement.

- The CCC suggests that an effective public engagement strategy should build on the findings of the UK Climate Assembly which reported in September 20206. The recurring themes of the report were the need for education and information for everyone, fairness, freedom and choice, and strong leadership from government, alongside valuing the co-benefits of climate action and the protection and restoration of nature.
- 5. The Environmental Law Foundation (ELF) works with communities in the UK to secure environmental justice for all7. We do this through free legal advice and information, public legal education, and policy work. Much of our work is underpinned by the Aarhus Convention, ratified by the UK in 2005, which seeks to improve access to information, public participation in decisionmaking and access to justice in environmental matters. Over the past 29 years ELF has established a cross-disciplinary network of ELF member lawyers and technical consultants which each year provides thousands of hours of free advice and assistance to communities and individuals who have nowhere else to turn to address their environmental concerns. Eight years ago we established a network of free environmental legal advice clinics, in partnership with universities across the UK. In 2020 we added policy clinics to our university network in which empirical research is carried out by students at undergraduate and postgraduate levels, supervised by faculty staff.
- At an earlier public legal education event at Exeter University in 20198, ELF began to explore Climate Emergency Declarations in the context of Devon's recent declaration, looking at the actions required to meet the objectives, the potential co-benefits flowing from this to address ongoing environmental concerns, and the opportunities for public involvement. Following this we sought to obtain a national picture of action being taken around local authority declarations and we established our Climate Emergency Declaration research project.
- This report is a summary of the research conducted so far.

https://unfccc.int/sites/default/files/english_paris_agreement.pdf

https://www.ipcc.ch/report/sixth-assessment-report-working-group-i/

https://www.bbc.co.uk/news/science-environment-58130705

https://www.theccc.org.uk/about/our-expertise/advice-on-reducing-the-uks-emissions/

https://www.theccc.org.uk/wp-content/uploads/2020/12/Policies-for-the-Sixth-Carbon-Budget-and-Net-Zero.pdf https://www.climateassembly.uk/report/

https://elflaw.org/news/successful-transforming-agriculture-event-at-exeter-university-on-the-16th-october-2019/

B. Methodology

- 8. Eight universities on ELF's university network of universities, and members of the UK Environmental Law Association (UKELA)⁹
 Student Working Party, took part in the research. Additional research was carried out by ELF. Each team focused on a different region or regions of the UK to enable ELF to build up a national overview. The regions covered were:
 - East of England
 - East Midlands
 - London
 - North East
 - North West
 - South East
 - South West
 - West Midlands
 - Yorkshire & Humber
 - Northern Ireland
 - Scotland
 - Wales
- 9. A total of 376 local authorities across the 12 regions were reviewed. The authorities and the research questions are set out in Annexes 1 and 2.
- 10. Research was carried out in two stages. An initial desk-top analysis of online information was conducted and a proforma research form completed¹⁰. This was followed up with Environmental Information Regulations/Freedom of Information requests to the relevant local authorities to attempt to complete any gaps. Analysis and evaluation of the information obtained was conducted, and reports summarising the results of the regional research were submitted to ELF.
- 11. The results are therefore limited by the extent of the research that was possible in the time available. However the picture that emerged was consistent across the regions.

C. Climate Emergency Declarations

- 12. There is no set definition of a Climate Emergency Declaration (CED). Broadly, CEDs are declarations by governments and organisations that humanity is facing a climate emergency, and that urgent action is required to address climate change and its potentially irreversible effects. CEDs started in Australia in 2016 and were brought to the UK by the Green Party, with Bristol City Council declaring the first CED in the UK in November 2018, followed by London one month later. The Scottish, Welsh and UK parliaments made CEDs in 2019 and around 300 local authorities have now done the same.
- 13. To be effective, CEDs need to be followed up with action plans and strategies to implement and monitor the changes necessary. Indeed, the work involved in pursuing and making a CED may be instrumental in cultivating the political will to implement effective change. Declaring a CED is often seen as the first step towards meaningful action on climate change and a reduction in carbon emissions. It is a focus point.
- 14. Our research indicated that around 79% of UK local authorities now have a CED.

D. Greenhouse Gas Protocol

- 15. The Greenhouse Gas Protocol[®] was developed in the 1990s and is a framework used globally for measuring greenhouse gases. Emissions are categorised as follows:
 - Scope 1 emissions direct greenhouse gas emissions from sources owned or controlled by an organisation
 - Scope 2 emissions indirect emissions from the generation of purchased energy by an organisation
 - Scope 3 emissions all indirect emissions not included in Scope 2, linked to an organisation's operations (voluntary reporting).
- 16. Categorising its emissions by scope can facilitate a local authority's understanding of both the extent of its carbon footprint and where action can be taken to reduce it. In order to achieve net zero, it will be necessary to reduce emissions across all scopes.

https://www.ukela.org/

A useful starting point was the Climate Emergency UK website: https://www.climateemergency.uk/

¹¹ https://ghgprotocol.org/

E. Areas of Focus

- 17. The most recent (2019) UK government greenhouse gas emissions figures summary¹² shows the percentage of the UK's emissions by sector: transport (27%); energy supply (21%); business (17%); residential (15%); agriculture (10%); waste management (4%); other - includes land use, land use change and forestry (5%). While not able to directly affect all of these, local authorities' main sphere of influence tends to cover transport, energy, buildings/ land use (planning), and waste. These are the areas where local policy changes may be required to meet the CED ambitions.
- 18. However, there is a need for consistency in addressing the climate emergency. BBC research published in August 2021¹³ highlights examples of council policies which are inconsistent with their climate goals, eg road building and airport expansion. This demonstrates the need for clarity and for CEDs to be an important part of their decision-making across the board.
- 19. We highlight below some examples of local authority actions in seeking to achieve their climate emergency declaration ambitions identified by our research. Some actions precede a CED but form part of the action to achieve the CED ambitions.

Transport

- Newcastle City Council's 'Electric by default' strategy. The council operates 51 electric council vehicles which has allowed for a fuel usage decrease of 34.2% over the past 10 years.
- As part of creating their Clean Air Strategy, Birmingham City Council has purchased 20 new hydrogen buses which are expected to save up to 79.3 tonnes of carbon dioxide emissions per annum.

Energy

Birmingham City Council's BEIS Decarbonisation Project commenced in January 2020 and focuses on renewable electricity generation. If this project is implemented from 2020-2050 across building types and sectors, it could potentially achieve an 80% reduction in carbon from the heating of buildings. Air source heat pumps will provide the largest impact as they require no planning permission and are a compact solution for residential areas. The council is also a partner in Birmingham District Energy Scheme, the largest low carbon heating network in Birmingham. In addition, the council is involved with Tyseley Energy Park, an Energy Innovation Zone situated in East Birmingham, which plans to develop energy from waste and provide waste processing technologies that utilise waste heat, capture CO2 and turn the waste into products and fuels.

- Coventry City Council has provided smart meters which are available for residents to borrow from libraries.
- Oldham Council has focused on council buildings and streetlighting, implementing, among other things, a low carbon redevelopment of the council depot at Alexandra Park, an LED lighting retrofit for Oldham Leisure Centre, an 891kW solar farm at Wrigley Head, Failsworth and a low carbon retrofit of Spindles Shopping Centre. The council is also exploring the potential to procure renewable energy for its main supply contract.
- Coventry City Council's Clean Energy Cashback scheme rewards organisations who reduce their energy emissions. It is also offering grants of up to £50,000 to businesses with fewer than 250 employees in order to become more energy and resource efficient.

Planning

- The overall issue of a sustainable long term outcome within the Key Issues in Forest of Dean's Issues & Options document for its new Local Plan consultation, notes that "a sustainable future includes delivery of development that is compatible with climate change and promoting actions that reduce carbon emissions in recognition of the declared and acknowledged climate emergency".
- Cotswold District Council's Local Plan review will examine all aspects of its policies through the lens of the climate emergency.

Waste

- Salford City Council's Love food, hate waste campaign is part of its public education work to encourage behaviour change in the community as an underpinning factor in addressing the climate emergency.
- Mid and East Antrim Borough Council provided employees with re-usable bottles, secured 93 businesses across the borough as part of Northern Ireland Water's 'Refillution Campaign', introduced a 'Reportable App' to allow people to report a variety of environmental concerns and involved employees through their 'Environmental Champions' team.
- Fermanagh & Omagh Council's Draft Climate Change and Development Strategy contains plans to increase the proportion of reuse and recycling and phasing out of single-use plastics within council offices and buildings and implementing waste education and promotional campaigns to reduce the amount of waste going to landfill by measures including working in partnership with other councils to develop a Waste Management Strategy to include services and infrastructure needed for collection, treatment and disposal of waste.

 $https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/957687/2019_Final_emissions_statistics_one_page_summary.pdf \\ https://www.bbc.co.uk/news/science-environment-58102578$

F. Public Engagement

- 20. The Preamble to the Aarhus Convention recognises that "improved access to information and public participation in decision-making enhance the quality and the implementation of decisions". Our research highlighted that those with plans tended to have better public engagement.
- 21. It is important that such engagement is not merely a 'tick-box' exercise and also that it involves those most likely to be affected by the decisions being made.
- 22. We set out below some examples of public participation identified by our research.

Public participation

- Sunderland City Council's Shadow Board has engaged with education partners, healthcare and emergency services with the intention of establishing a Young People's Advisory Group.
- Colchester Borough Council offered towns and parishes support
 and resources to help with responding to climate change. This
 included arranging a presentation in June 2021 spreading
 awareness of the council's work to show what could be done
 to respond to the climate emergency. Additionally, it is working
 with Eco Colchester (local community group) and En-Form (local
 environment charity) on several projects, and other groups such as
 Together we Grow CIC which supports tree planting.
- Bristol City Council allocated a proportion of its budget to prospective projects and invited the community to make suggestions which led to over 600 groups' involvement.
- Rochdale Borough Council has convened a Climate Emergency
 Working Group involving partners in housing, education, health,
 leisure and culture. They are currently identifying resources and
 support for community involvement that includes a proposal from
 the Voluntary and Community sector body, Action Together for a
 Green Neighbourhoods Coordinator and community fund.
- Warrington Borough Council has held briefing meetings with
 the Local Strategic Partnership and Youth Parliament. It has also
 established a "Cleaner/Greener" Commission "to lead the public
 debate on climate change and energy in its widest context. This
 will involve the public, private, third sector and wider community
 to help improve understanding of the issues and the action that
 needs to be taken. The Commission will draw together conclusions
 on the current position, identify areas for improvement and make
 recommendations for change in order to move the whole of
 Warrington to a position on net zero carbon".

- Peterborough City Council has a carbon literacy training scheme for council staff and a climate change cross party working group. It has held two annual climate action days to engage businesses and residents.
- St Albans District Council is seeking input from key experts in the community, including local environmental consultancies and charities in the creation of its climate strategy. It is running a Climate Advisory Group involving key community representatives to monitor the council's progress, publishing a Sustainability Newsletter, establishing an environmental community group and organising a Sustainability Festival each year to promote and engage the public.
- Hertfordshire County Council plays an active role in the
 Hertfordshire Climate Change & Sustainability Partnership (HCCSP),
 the membership of which is the ten district and borough councils,
 the county council and the local enterprise partnership. In addition
 to the Hertfordshire Association of Parish and Town Councils and
 the HCCSP, the County Council engages with Friends of the Earth,
 Climate Action Groups, the CPRE, the Environment Agency, water
 companies, the Canal and River Trust, Herts & Middlesex Wildlife
 Trust, the Woodland Trust, energy companies and many other
 community groups.
- Durham County Council works alongside an Environment
 Partnership and Climate Emergency Board chaired by Durham
 University, and a youth council is being established in the Durham
 area.
- Climate Ready Clyde is an association of 15 public bodies around the Clyde region (including eg East Renfrewshire, North Lanarkshire, West Dunbartonshire and Glasgow City Council) working in association on climate change. It has published the Glasgow City Region Climate Adaptation Strategy and Action Plan.
- East Devon District Council is collaborating with an art gallery to promote the issue of a climate change emergency.
- Leeds City Council has launched the 'Big Leeds Climate Conversation' in partnership with the Leeds Climate Commission, under which a citizens' jury presented 12 recommendations to the council's Climate Emergency Advisory Committee.
- Reading Borough Council sees communication with and engagement of the wider public as critical to achieving its aims. The council held a public forum and then community led theme groups helped develop six action plans (energy, transport, resources/ waste, water, nature, health & wellbeing).

F. Public Engagement

- Blenau Gwent held a virtual Climate Assembly in March 2021.
- Cardiff City Council's 'One Planet Cardiff' strategy calls on businesses and residents to join forces with the council to make the lifestyle changes required to become a carbon neutral city by 2030.
- Recognising the need to intensify its action to reduce its climate impact, Monmouthshire Council sought ideas to update its action plan from the community via an online survey, afternoon drop in session, and a stall at a climate futures festival.
- Stirling Council had visible community participation on climate change and promoting active involvement through eg its 'Climate Conversations' section on its website.
- Although Comhairle nan Eilean Siar did not appear to have made a CED, it had an active Climate Community Plan since 2012.

G. Information

a. Locating

- 23. Regulation 4(1) of the Environmental Information Regulations (EIR) 2004, SI 2004/3391, requires a public authority to:
 - a) progressively make environmental information available to the public by electronic means which are easily accessible;
 and
 - b) take reasonable steps to organize the information relevant to its functions with a view to the active and systematic dissemination to the public of the information.
- 24. Despite some examples of good practice, researchers across the regions consistently found difficulties locating information online regarding local authorities' actions to address climate change. For example, such information was often only contained in minutes of council meetings which although available on council websites were not easy to navigate, identify the relevant location, and sort through. Additionally, frequently the detail of such information was lacking (eg the level of emissions) or not obviously available to the public at all and so an EIR request would be necessary. All of these points raise questions about compliance with Regulation 4(1).

b. Obtaining

- 25. Local authorities have a duty under regulation 5 of the EIR 2004 to make the information available as soon as possible and within 20 working days (which can be extended to 40 working days under regulation 7 for complex or large volumes of information). Researchers found that local authorities frequently relied on the extension provisions and often the level of detail in the information supplied was lacking. On a number of occasions researchers received no response to their requests at all. Such action would appear to be counter both to the duty in regulation 5 as well as the spirit of the EIR in general.
- 26. It is apparent that many local authorities would benefit from assistance in complying with the requirements of the EIR.
- 27. However, our research also identified good examples of information provision by local authorities and we set out two of these below.

Information

- Peterborough City Council Information regarding its CED and climate strategy was accessible and baseline emissions were provided in its climate action plan.
- Lewisham Council had published a highly detailed strategy that included planned carbon reductions in ktC02equiv that were sought to be achieved by each planned action. Lewisham had

G. Information

calculated three separate forecasts for reductions: 'Core Actions' which include those actions which were deemed within the current scope of Lewisham Council and other stakeholders over a 10 year horizon; 'Radical Stretch' containing actions which either extended significantly the actions under the Core Action scenario or assumed wholesale new actions on individual sectors; finally, 'Systemic change' based on projects for which emission reductions had been assigned but the means of achieving them were perhaps not well defined, or where new technology or significant infrastructure would be required.

c. Comparing

- 28. Our research frequently found difficulties in identifying the levels of local authority emissions by scope. Many local authorities only declared Scope 1 and 2 emissions, stating that Scope 3 emissions were too complex to assess or that they were beyond their sphere of influence. There was frequently a lack of milestones in local authorities' plans. Not only does this make it difficult for a local authority to plan and monitor the necessary reduction in emissions across the board, it also makes it hard to assess progress by that local authority, or to compare its progress with that by other local authorities. This is an issue noted in recent reports by the National Audit Office (NAO)14 and the Green Alliance¹⁵.
- 29. It is clear that many local authorities would benefit from assistance in reporting emissions to facilitate the assessment of progress of reductions across the UK16.
- 30. In turn, our research also identified a general lack of connectivity and co-ordination between local authority plans and actions. There are some exceptions (eg West Midlands Combined Authority) but the research indicates that a more connected approach would help learning to be shared across local authorities for the benefit of all. There was also evidence of local authorities relying on a regional CED commitment rather than making their own detailed action plans. As highlighted by both the NAO and the CCC, clearer guidance from national government on responsibilities and priorities for local authorities would assist here and without it, there is a risk that action to address the climate emergency is not as co-ordinated, targeted or widespread as it
- 31. However, our research did identify examples of councils setting out their emissions and planned reductions very clearly and we set some of these out below.

Emissions

- Herefordshire Council declared emissions by scope and reduction in percentage terms.
- Birmingham City Council set out planned actions in each scope.
- Sunderland City Council's Low Carbon Framework uses clear, quantitative measures in multiple graph formats.
- Glasgow City Council appears to have been working on GHG emissions reductions for nearly two decades with detailed data and analysis available on emissions between 2005-2018 and this information being provided within a wider project of Glasgow performance indicator as part of the Understanding Glasgow: The Glasgow Indicators Project. Similarly, the council provided quite clear discussion of GHG emissions in line with the GHG Protocol and presented emissions in terms of Scope 1-3. The council's work includes undertaking a Carbon Impact Assessment for every action taken by the city, by making it a requirement of all committee papers comparable to e.g. the Equality Impact Assessment process.
- Reading Borough Council's Greenhouse Gas Report sets out its carbon footprint with emissions in Scopes 1, 2 and 3. The council's Climate Emergency Strategy sets out a pathway to net zero with targets, milestones and monitoring provisions. The priorities identified are housing (retrofitting and new - it recognises this would require national government policy changes and resources); renewable energy generation; decarbonising transport systems; consumption and waste; Nature-based solutions.
- Warwick District Council has created a timeline detailing when actions need to be implemented by.

 $https://www.nao.org.uk/wp-content/uploads/2021/07/Local-government-and-net-zero-in-England.pdf https://green-alliance.org.uk/resources/The_local_climate_challenge.pdf \\$

There are tools available to assist calculating emissions which are used by some local authorities, eg https://scattercities.com/

H. Decision Making

- 32. Our research identified that decision-making is recognised by many local authorities as a key element of their climate emergency response. Some local authorities are making adjustments for their planning or procurement decisions but this was not always clear.
- 33. We set out below some examples identified by the research where local authorities' CEDs are having an impact on their decision making processes.

Decision-making

- Cornwall Council has introduced a new decision-making wheel that
 ensures all key decisions take social, economic and environmental
 impacts into consideration to ensure that the Cornish public are not
 impacted upon negatively. The council indicates that every service
 it supplies implements the decision wheel into its service plans.
- All decisions of North Somerset Council must make reference to how they will impact its CED. All new and future strategies and policies must have the relevant climate emergency actions embedded within them.
- Bristol City Council has revised its approval process for any new
 and future projects that are accepted and decided by the council.
 This incorporates an environmental impact assessment including
 carbon considerations. The process is being added to its projects
 and procurement work and its property and estates work with its
 strategic partner organisations. It has also appointed three staff
 members to improve its projects, procurement and property.
- Portsmouth City Council has integrated its CED within its decisionmaking process by using an Integrated Impact Assessment. This ensures all decisions are reviewed and considers the impact of carbon emissions and a range of other societal concerns within the council's remit.
- A small but significant number of London authorities had plans to introduce concerns about climate change, or "green thinking," into their internal systems and decision-making processes. In particular, seven boroughs planned to introduce sustainable procurement processes; three planned to make climate change an integral part of all council decision-making; and two planned to make their investment or pensions decisions more sustainable.

I. Co-benefits

- 34. There are many co-benefits to be gained from work to address the climate emergency such as improved air quality, health and housing quality. Many councils are already carrying out action on these matters (eg action around transport) which will also help them in seeking to achieve their CED ambitions.
- 35. We set out some examples of these identified by the research below.

Air quality

- Tower Hamlets CED states that 40% of residents in the borough live
 in areas which breach EU and government guidance on safe levels
 of air pollution. It notes the council's ongoing work to tackle poor air
 quality and states that the council believes that air quality is a 'social
 justice issue.' The council resolved to develop a carbon neutral plan
 and measure a climate emergency annual report against it.
- Birmingham City Council has implemented plans to charge owners of high polluting vehicles when entering certain parts of the city as part of its Clean Air Strategy.
- Solihull Metropolitan Borough Council's Clean Air Strategy intends to focus on car sharing schemes, bike hire schemes, and the installation of green infrastructure.

Biodiversity

Liverpool City Council's EU funded Horizon 2020 Urban GreenUp project is retrofitting and monitoring a range of Nature Based Solutions across the city to help tackle future predicted impacts of climate change. Work includes the installation of green walls, floating islands, sustainable urban drainage systems, a pollinator roof, tree planting and a dozen pollinator planting sites; several of which are innovative in nature and delivered using sustainable principles. These are complemented by a recent art habitat sculpture trail, the promotion of iNaturalist as a bioapp and a number of community engagement physical and mental wellbeing programmes.

J. Regional Snapshots

36. We set out below an overview of each region from information identified by the research.

East of England

- 50 local authorities 34 have made a CED (68%).
- EIR requests were sent to all 50. There were 11 responses (22%).
- The majority of councils are aiming to be carbon neutral by 2030 but not all have a plan available on how they will achieve this goal.
- 31 local authorities had published climate action plans (62%), and an additional four had draft plans available on their websites. A further four stated that they had strategies in development and three local authorities declared their carbon reduction goals as part of a wider local or corporate plan, rather than an individual document.
- 12 councils (24%) had measured their current ktCO2e emissions
 by scope 1, 2 and 3, and four councils stated that they intended to
 establish their emissions baselines in the near future. One council
 excluded scope 3 emissions in their overall readings. Some councils
 mentioned that they did not report on scope 3 because it was too
 difficult to define and measure. The vast majority of councils did
 not set targets for the reduction of emissions by scope.
- Some councils stated they had made a CED but the information could not be located by researchers.
- There did not appear to be an indication that the climate emergency concerns were influencing council decision-making in any way by eg referring to the climate emergency or pointing to the CED in planning decisions although this may be emerging in the internal development work of council officers.
- Community programmes and outreach were a common feature of action plans. Education and spreading awareness of climate change and adaptation among businesses and residents was a recurring proposal, along with seeking to ensure that such information would easily be available on the council website. Consultation groups with community groups, residents and businesses were also common.
- With some limited exceptions, there appeared to be a lack of clarity and transparency in work and action relating to climate change.

East Midlands

- 40 local authorities 25 (around 63%) have made a CED, although 31 have published a strategy or action plan.
- EIR requests were sent to all 40 authorities 2 responses of poor quality (one word or short answers with no links) and 8 failed to respond at all.
- There appeared to be ambitious targets to be carbon neutral but in many cases these are not backed up by plans, actions undertaken or reported emissions.
- Where information purported to be available, it was often difficult to find carbon action plans/emissions data, eg only available in meeting minutes.
- Many councils did not include emissions readings and not all that
 did included scopes some included scope 3 emissions, others
 didn't. 14 councils had measured their current ktCO2 equivalent
 emissions by scope 1, 2 and 3. While a further 2 had measured
 these by scope 1 and 2 only, and four had measured their emissions
 as an aggregate of all scopes. Four councils had measured their
 emissions differently, eg by topic or per capita although some
 assessment had been carried out. Two councils were still in the
 process of gathering emissions. 14 councils did not have any carbon
 emission measurements to be made available.
- Seven councils had set targets for reduction of these emissions by scopes 1, 2 and 3. A further five councils had set reductions of emissions by all scopes. Three councils had set emission reduction targets by emission topic and a further two of 40 authorities were still in the process of setting new targets. The remaining 23 councils had not stated their emission reduction targets.
- Interim targets for staged, decreasing emissions over a set period of years were not always available notwithstanding that the councils provided a target year for carbon neutrality.
- Many declarations and minutes included requests for funding, resources and support from central government to tackle climate change.
- Six local authorities included information about stakeholder involvement in their strategies. Many local authority websites did not promote their climate emergency or carbon reduction efforts openly, and so finding relevant information was difficult during desktop research.

J. Regional Snapshots

- Some councils did not appear to be taking any steps to address the climate emergency.
- A number of councils referred to difficulties or obstacles in their efforts to address the climate emergency such as lack of policy on carbon budgets from central government and that the National Planning Policy Framework does not adequately support local authorities in setting their own planning requirements for sustainable net zero new homes and buildings.

London

- 34 local authorities, 29 have made a CED (86%).
- 33 EIR requests were sent, 28 responses were received.
- More than half of boroughs surveyed (18 of 34) have put strategy
 or action plan in place to reduce emissions, many in drafting or
 adoption phase but appears at least nine (26%) have no plan or
 strategy at all
- Many boroughs without a CED had existing climate change strategies or were taking action to address climate change
- The majority of specific climate change actions planned by London boroughs fell into five broad categories: power, buildings and infrastructure; transport; biodiversity; and decision-making systems.
- Many boroughs commented on the need for top-down action and leadership needed at national government level to facilitate real change.
- Many boroughs followed the lead of the Mayor of London (for London to be carbon neutral by 2050) although some boroughs introduced their own timescales (eg by 2030).
- Some evidence of empty declarations, or in other words, declarations which contained grand statements, but which have not been followed up with any particular action.
- There are some impressive ambitions but often there does not appear to be mechanisms in place to monitor or report progress.
 There is discrepancy in reporting standards and emissions projections. Difficult for public to track effect of policies to reduce emissions.
- Appeared to be no indication that key area of decision-making, eg land use planning, is currently within scope of climate action, where targets within action plan would at very least be a material consideration.
- Eight authorities appeared to have no provision for community involvement and seven simply stated a general ambition to involve the public. However, more than half the London boroughs had

- taken concrete steps to involve the public in action on climate change. Some 14 authorities had held a public consultation on climate change or allowed the public to feed into their climate action plan or strategy. Further, five authorities had run or planned to run specific Citizens Assemblies to shape their action on climate change.
- There was evidence of sustainability and green-decision making incorporated into activities of London boroughs, eg specific staff teams or council working groups.
- There was also evidence that many local authorities are taking the
 action required seriously. However, there is considerable work to
 be done to ensure all local councils are effectively securing carbon
 reduction.

North East

- 12 local authorities 10 have made a CED (83%).
- 12 EIR requests made.
- Councils without a CED had a climate change strategy plan.
- CEDs followed by action plans with a deadline year for carbon neutrality tended to follow the same pattern covering transport, housing, tree planting, and renewable energy.
- Councils without a CED have less climate positive action plans and initiatives in place. Some with a CED do not yet have action plans.
- There is a lack of clarity with regard to target emission figures.
 These are commonly expressed as a reduction by percentage with no publicly available information about CO2 tonnage of emissions.
- Many councils prioritised CO2 emissions reduction by reducing waste disposal and growing sustainable green fleets of council vehicles, including encouraging staff to use public transport or sustainable vehicles. Several appeared to emphasise carbon offsetting such as tree planting.
- Obtaining information on baseline data and emissions targets was difficult and required formal requests.
- Although there were some positive examples, the research found a
 general lack of effective public participation some councils seem
 to be carrying out the bare minimum to involve their communities,
 others have no record of effective public participation.
- Many action plans were bland with inaccessible language, and
 often difficult to find. Content is largely qualitative rather than
 quantitative so there was a lack of transparency. Even following EIR
 requests, the information obtained was often limited.

J. Regional Snapshots

Data on monitoring and evaluation is limited. Targets are often
clear for initiatives (eg number of trees/charging stations/vehicles)
though there is no regular information on progress. There is not
much solid information available to the public and the general level
of commitment to taking action following the declarations is lacking
in many instances.

North West

- 26 of 27 local authorities have made a CED (96%).
- 27 EIR requests sent, 2 councils did not respond.
- There is a wide divergence of timescales to tackle the climate emergency with some councils already implementing action plans and others at the plan drafting stage.
- 70% of councils surveyed had a climate change action plan or strategy to reduce emissions in place, with others currently preparing or consulting on draft strategies.
- Many plans were ambitious in scope, and good systems of data collection and reporting were in place.
- There is evidence that sustainability and green decision-making is being incorporated into the activities of councils. Several mentioned that specific posts had been created for coordinating climate action.
- Six authorities appeared to have no provision for community involvement. However, most emphasised its importance, and several strategies are in development precisely because they are still in the process of public consultation.
- With few exceptions, even councils without a climate strategy, in final form or at all, were engaging in action to mitigate or avoid the impacts of climate breakdown. Some smaller councils were part of wider schemes involving combined authorities.

South East

- 69 local authorities 54 (78%) have a CED. In addition, 13 (19%)
 have committed to action on climate change, and 2 (3%) are taking
 other steps.
- 67 authorities expressed aims for carbon neutrality by particular year: 2025 (2); 2030 (46); 2035 (1); 2040 (2); 2050 (16).
- There is some evidence of community involvement in the development of action plans although it appears to be limited.

South West

- 32 councils all claim to have produced a CED although not all are available to the public. Only 5 have not produced a strategy or plan.
- EIR requests were sent to every authority, 25 responses were received. Most failed to differentiate between Freedom of Information and EIR. Many answered the requests thoroughly although some were only partial or didn't have the information requested.
- Less than half could provide a declaration of scopes 1, 2 and 3 emissions. Only one council was able to confirm reduction of emissions by scope.
- Some councils appear to be relying on their commitment to the Devon Carbon Plan and adapting policies from this, rather than creating a weighty climate action plan themselves.
- There is evidence of partnership working with universities and organisations to achieve carbon neutral goals.
- In addition, there is evidence of training and educating staff
 on climate literacy and behaviour change and engaging local
 businesses in different ways. Councils are engaging with residents
 through consultations, webinars, social media, conferences,
 community forums, citizens assemblies, encouraging behaviour
 change to help meet targets.
- More funding and central government support were cited as factors that could overcome obstacles at the national level. Policy changes are not keeping up with needs.
- Council websites are often hard to navigate and lack some information. Customer services teams do not always know where to redirect requests for information or contacts.

West Midlands

- 31 authorities 24 have made a CED (77%) of these 16 plan to be carbon neutral by 2030, 1 by 2025, 1 by 2050, 6 no clear date.
- Sent EIR requests to 8 councils 6 responses.
- Most of the statements in the reports of the local authorities seemed to lack meaningful substance which is not backed by firm implementation of planned actions.
- Varying levels of success in locating specific planned actions for scopes 1, 2 and 3, eg actions not categorised as such.

J. Regional Snapshots

- Many action plans reflect others, eg electric vehicles and streetlighting. There is a question whether plans reflect shortmedium term intentions and little evidence for several councils that plans are being carried out.
- Climate adaptation more focus on managing flooding than overheating.
- Lack of information about emissions, actions they are taking and how involving community.

Yorkshire & Humber

- 16 out of 21 councils have made a CED (76%).
- Most councils do not have extensive plans for involvement of the local community. However, those with them tended to have better community engagement.
- Overall councils are not monitoring their progress against their action plans for emissions reduction or adjusting targets as necessary.
- The extent to which CEDs are taken into account in everyday decisions (eg planning or procurement) is unclear.
- It is not clear how citizens' views are taken into account or how the public is to be kept informed and engaged in delivering action plans.
- There was no reference to authorities co-operating with others to deliver targets or share information about best practice.
- Often the CED is treated as applying only to the council. May be using 2030 as a placeholder date.
- Most councils have called on government for more devolved powers and financial resources to achieve net zero.
- There is evidence of commitment to community involvement with a number of authorities setting up local groups for community members to be directly involved in the climate change process, several with youth involvement.
- Those authorities with larger budgets allocated to their CED tended to have more detailed action plans with later target dates.

Northern Ireland

- 11 councils 7 have made a CED (64%).
- Appears that work by councils to reduce their own emissions is
 just the start and they need to work alongside local communities,
 businesses and others in civil society if real change is to be secured.
- · Level of detail in CEDs varies considerably.
- Three broad categories of planned actions to reduce emissions: buildings & infrastructure; transport; waste.
- There are instances of impressive ambitions but no clear means to monitor. No NI authority publicly reports greenhouse gas emissions by scope.
- Generally, there is greater emphasis on adaptation than mitigation.
 Eight councils have adaptation plans in some form.
- A number of authorities have limited opportunities for public engagement but there are some good examples.
- There is a range in local authorities' climate actions and plans in terms of scope, ambition, existence of targets and focus.
- Climate action and/or adoption of plans and strategies appears to have stalled in many areas.
- It was often difficult to find the information in one place or to locate the information at all.

Scotland

- One key difference between Scotland and the other UK nations is
 that all councils must comply with the duties relating to climate
 change under Part 4 of the Climate Change (Scotland) Act 2009
 (CCASA) (as amended) which requires, among other things, all
 councils to contribute towards the 'net zero' targets set in Part 1 of
 the Act and to report annually on these. The comparable target (to
 the CCA) is to achieve 'net zero' carbon emissions in Scotland by
 2045 with interim targets in 2020, 2030 and 2040 for progressive
 high reductions. However, notwithstanding those duties, there did
 not appear to be any reference to them in making a CED.
- 32 councils 21 have made a CED (66%) although climate change action in Scotland appears greater than this figure suggests. There was only a very small number of councils where no CED or climate change action or concern was evident.

J. Regional Snapshots

- Well over half of these aligned their key targets to being carbon neutral (achieving 'net zero') by 2045 although it was far less clear that they would meet the interim targets set out in the CCSA.
- While there are many plans and strategies in place, the majority do not provide specified targets or key performance indicators by eg expressly stating the extent or reductions proposed, accordingly eg to the GHG Protocol scope 1-3 emission sectors.
- Most councils, up to 90%, had some public facing reference to climate concerns and the need to act and so were expressing some community participation.

Wales

- 22 councils 16 have made a CED (73%). Those without support the Welsh Government's CED and ambition for a carbon neutral public sector by 2030.
- 20 local authorities have action plans.
- Requests for information and follow up EIR requests were sent to all 16 authorities with a CED. No responses were received.

K. Observations

Public Participation

37. Article 7 of the Aarhus Convention provides for public participation in the preparation of plans, programmes and policies relating to the environment. The Environmental Assessment of Plans and Programmes Regulations 2004, SI 2004/1633, requires environmental assessment of plans and programmes that set the framework for future development. It is arguable that the preparation of action plans would come within the provisions of the regulations and should be subject to the public consultation requirements set out in regulation 13.

Planning

38. The Planning for the Future white paper contains proposals which would restrict local authorities' ability to impose their own conditions on development through local plans, a reduced approvals process in some areas, relaxed rules around permitted development, and removal of the duty to co-operate. Such changes could limit the ability of local authorities to take the action required to address the climate emergency.

Covid-19

39. It is recognised that the restrictions and limitations caused by the Covid-19 pandemic are likely to have been an obstacle to local authority action in terms of diverting resources and impacting potential for community engagement on climate change issues. However, not all local authorities referenced this.

M. Conclusion

40. It is clear from the research that the majority of local authorities are taking action to address the climate emergency, either following a CED or more generally. However, there is a wide discrepancy in terms of the urgency with which such action is formulated and progressed.

Barriers

- 41. Our research has indicated that there are a number of barriers to effective action. The Climate Change Committee (CCC) has previously stated that local authorities need supporting policy and funding from central government for this work, and to ensure that local authorities have projects ready for when funds become available. The Powershift¹⁷ report also indicates that barriers to local authority action is not about lack of powers but rather a lack of power and resources and a clear framework to support local and national net zero delivery. These issues were highlighted frequently by local authorities during our research.
- 42. It's very clear that local authorities will play a key role in the pathway to net zero. However, they will need policy and funding support from central government in order to deliver the changes necessary.

Engagement

- 43. The CCC notes that nearly 60% of the changes in its pathway to the 6th carbon budget rely on societal and behavioural changes and local authorities' leadership role with the public puts them at the heart of developing and replicating solutions.
- 44. Public engagement will play a key role in this. However, our research has revealed concerns around the availability of, and quality of, information for communities about local climate change action. Such information needs to be more accessible and transparent in order to meet the CCC objectives, as well as legislative obligations. In doing so, councils need to set clear targets and put suitable monitoring arrangements in place.
- 45. There is also a need for more education and information to encourage the involvement, understanding and support of the wider community. It is important that such engagement includes those most likely to be impacted by the decisions made.
- 46. Such engagement would benefit from greater collaboration across local authorities, their communities, and other stakeholders, eg parish councils and community groups.

47. Additionally, regional collaboration across local authorities, eg the work of West Midlands Combined Authority, or stakeholder groups eg Climate Ready Clyde, would facilitate this process and enhance local action.

Decision-making

- 48. To be effective a CED needs to impact decision-making at every level and our research found examples of this such as in the procurement process. However, this type of change needs to be more widely implemented with the 'status' of a CED carrying considerable weight in the local authority decision-making process. Within planning decisions for example, a CED should, at the very least, be taken account of as a "material consideration". Without action, there is a risk that CEDs become political statements with no substance. There is an opportunity for CEDs to provide a framework for clear and effective action on climate change at the local level. It remains to be seen whether the 'status' of a CED in decision-making may be the subject of a legal challenge.
- 49. Overall, while there is clearly a huge amount of work required, there is optimism within the research results that with the right support local authorities' CED ambitions can be achieved. There are a number of co-benefits that can flow from work to address the climate emergency such as better health and improved biodiversity and these can help to encourage action. However, the research also demonstrates that there needs to be greater urgency in addressing the climate emergency at the local level and centrally funded resources to facilitate the work required.

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Annex 1

ELF Policy Clinic brief

Climate Emergency Declarations

Aim: To build up a national picture of action on Declarations of Climate Emergency by local authorities. This would cover: the action required to meet the Declarations' ambitions; current progress with this; and opportunities for local communities to be involved in the decision making processes required.

The research area covers the UK and is divided by region. Each university will be asked to look at one or two regions. They will be tasked with research into the following questions:

- 1. How many local authorities have made a Climate Emergency Declaration? List these and group them by type of authority (County, City, District, Town, Parish etc.)
- 2. What status have local authorities given their Declarations?
- 3. What action have these local authorities taken so far to meet their Declaration ambitions? How are the Declarations influencing their decisions?
- 4. What further action do they need to take and by when to meet their Declaration ambitions? What changes, eg to local policy, are required to meet these ambitions?
- 5. Are any changes required at a national level eg to national policy, to facilitate the process? If so, what are these?
- 6. What are the opportunities for community involvement (at local or national level) in the decision making processes for the changes necessary? What actions can local communities take to ensure effective involvement?
- 7. How have local authorities involved their communities in the decision making processes around their Climate Emergency Declarations?

Annex 2

Local authorities reviewed

East of England

- Babergh District Council
- Basildon Council
- Bedford Borough Council
- Borough Council of King's Lynn and West Norfolk
- Braintree District Council
- Breckland Council
- Brentwood Borough Council
- Broadland District Council
- Broxbourne Borough Council
- Cambridge City Council
- Cambridgeshire County Council
- Castle Point Borough Council
- Central Bedfordshire Council
- Chelmsford City Council
- Colchester Borough Council
- Dacorum Borough Council
- East Cambridgeshire District Council
- East Hertfordshire District Council
- East Suffolk Council
- Epping Forest District Council
- Essex County Council
- Fenland District Council
- Great Yarmouth Borough Council
- · Harlow District Council
- Hertfordshire County Council
- Hertsmere Borough Council
- Huntingdonshire District Council
- Ipswich Borough Council
- Luton Council
- Maldon District Council
- Mid Suffolk District Council
- Norfolk County Council
- North Hertfordshire District Council
- North Norfolk District Council

- Norwich City Council
- Peterborough City Council
- Rochford District Council
- South Cambridgeshire District Council
- Southend-on-Sea Borough Council
- South Norfolk Council
- St Albans District Council
- Stevenage Borough Council
- Suffolk County Council
- Tendring District Council
- Three Rivers District Council
- Thurrock Council
- Uttlesford District Council
- Watford Borough Council
- Welwyn Hatfield Council
- West Norfolk Borough Council
- West Suffolk Council

East Midlands

- Amber Valley Borough Council
- Ashfield District Council
- Bassetlaw District Council
- Blaby District Council
- Bolsover District Council
- Boston Borough Council
- Broxtowe Borough Council
- Charnwood Borough Council
- Chesterfield Borough Council
- Corby Borough Council
- Daventry District Council
- Derby City Council
- Derbyshire County Council
- Derbyshire Dales District Council
- East Lindsey District Council
- East Northamptonshire District Council
- Erewash Borough Council
- Gedling Borough Council
- Harborough District Council

- High Peak Borough Council
- Hinckley and Bosworth Borough Council
- Kettering Borough Council
- Leicester City Council
- Leicestershire County Council
- Lincoln City Council
- Lincolnshire County Council
- Mansfield District Council
- Melton Borough Council
- Newark and Sherwood District Council
- North East Derbyshire District Council
- Northampton Borough Council
- North Kesteven District Council
- North Northamptonshire Council
- North West Leicestershire District Council
- Nottingham City Council
- Northamptonshire County Council
- Nottinghamshire County Council
- Oadby and Wigston Borough Council
- Peak District National Park Authority
- Rutland County Council
- Rushcliffe Borough Council
- South Derbyshire District Council
- South Holland District Council
- South Kesteven District Council
- South Northamptonshire CouncilWellingborough Borough Council
- West Lindsey District Council
- West Northamptonshire Council

London (borough councils)

- Barking and Dagenham
- Barnet
- Bexley
- Brent
- Bromley
- Camden
- · City of London

Annex 2

- Croydon
- Ealing
- Enfield
- Greater London Assembly
- Greenwich
- Hackney
- Hammersmith and Fulham
- Haringey
- Harrow
- Havering
- Hillingdon
- Hounslow
- Islington
- Kingston upon Thames
- Lambeth
- Lewisham
- Merton
- Newham
- Redbridge
- Richmond upon Thames
- Royal Borough of Kensington and Chelsea
- Southwark
- Sutton
- Tower Hamlets
- Waltham Forest
- Wandsworth
- Westminster

North East

- Darlington Borough Council
- Durham County Council
- Gateshead Council
- Middlesbrough Council
- Newcastle City Council
- North Tyneside Council
- Northumberland County Council
- North Yorkshire County Council
- Redcar and Cleveland Borough Council

- South Tyneside Council
- Stockton-on-Tees Borough Council
- Sunderland City Council

North West

- Allerdale Borough Council
- Barrow Borough Council
- Blackburn with Darwen Borough Council
- Blackpool Council
- Bolton Council
- Bury Council
- Carlisle City Council
- Cheshire East
- Cheshire West and Chester Council
- Copeland Borough Council
- Eden District Council
- Halton Borough Council
- Knowsley Metropolitan Borough Council
- Liverpool City Council
- Manchester City Council
- Oldham Council
- Rochdale Borough Council
- Salford City Council
- Sefton Council
- South Lakeland District Council
- St. Helens Borough Council
- Stockport Metropolitan Borough Council
- Tameside Metropolitan Borough Council
- Trafford Council
- Warrington Borough Council
- Wigan Metropolitan Borough Council
- Wirral Council

South East

- Adur Borough Council
- Adur District Council
- Ashford Borough Council
- Basingstoke & Deane Borough Council
- Bracknell Forest Council

- Brighton & Hove City Council
- Buckinghamshire Council
- Canterbury City Council
- Cherwell District Council
- Chichester District Council
- Crawley Borough Council
- Dartford Borough Council
- Dover District Council
- Eastbourne Borough Council
- East Hampshire District Council
- Eastleigh Borough Council
- East Sussex County Council
- Elmbridge Borough Council
- Epsom and Ewell Borough Council
- Fareham Borough Council
- Folkestone and Hythe District Council
- Gosport Borough Council
- Gravesham Borough Council
- Guildford Borough Council
- Hampshire County Council
- Hart District Council
- · Hastings Borough Council
- · Havant Borough Council
- Horsham District Council
- · Kent County Council
- Isle of Wight Council
- Lewes District Council
- Maidstone Borough Council
- Medway Council
- Mid Sussex District Council
- Milton Keynes Council
- Mole Valley District Council
- New Forest Borough Council
- Oxford City Council
- Portsmouth City Council
- Reading Borough Council
- Reigate and Banstead District Council
- Rother District Council

Annex 2

- Runnymede Borough Council
- · Rushmoor Borough Council
- Sevenoaks District Council
- Slough Borough Council
- · Southampton City Council
- South Oxfordshire District Council
- Spelthorne Borough Council
- · Surrey County Council
- Surrey Heath Borough Council
- Swale Borough Council
- Tandridge District Council
- Test Valley Borough
- Thanet District Council
- Tonbridge and Malling Borough Council
- Tunbridge Wells Borough Council
- · Vale of the White Horse District Council
- · Waverley Borough Council
- Wealden District Council
- West Berkshire Borough Council
- West Oxfordshire District Council
- West Sussex County Council
- Windsor and Maidenhead Borough Council
- Winchester City Council
- · Woking Borough Council
- · Wokingham Borough Council
- · Worthing Borough Council

South West

- Bath and North East Somerset Council
- Bristol City Council
- Bournemouth, Christchurch and Poole Council
- Cheltenham Council
- Cornwall Council
- Cotswolds District Council
- Council of the Scilly Isles
- Devon County Council
- East Devon District Council

- Exeter City Council
- · Forest of Dean Council
- Gloucester City Council
- Gloucestershire County Council
- Mendip District Council
- Mid Devon District Council
- North Devon District Council
- North Somerset Council
- Plymouth City Council
- Sedgemoor District Council
- Somerset County Council
- Somerset West and Taunton Council
- South Gloucestershire Council
- South Hams District Council
- South Somerset District Council
- Stroud Council
- Teignbridge Council
- Tewkesbury Council
- Torbay Council
- Torridge District Council
- West Devon Borough Council
- West of England Combined Authority
- Wiltshire Council

West Midlands

- Birmingham City Council
- Coventry City Council
- Herefordshire Council
- Shropshire Council
- Solihull Metropolitan Borough Council
- Staffordshire County Council
- Warwick District Council
- Walsall Council
- City of Wolverhampton Council
- Worcester City Council.

Yorkshire & Humber

- Barnsley Metropolitan Borough Council
- City of Bradford Metropolitan District

- Council Calderdale
- Calderdale Metropolitan Borough Council
- Craven District Council
- Doncaster Council
- East Riding of Yorkshire Council
- Hambleton District Council
- Harrogate Borough Council
- Hull City Council
- Kirklees Council
- Leeds City Council
- North Lincolnshire Council
- North East Lincolnshire Council
- Richmondshire District Council
- Rotherham Metropolitan Borough
 Council
- Ryedale District Council
- Scarborough Borough Council
- Selby District Council
- Sheffield City Council
- City of York Council
- Wakefield Council

Northern Ireland

- Antrim and Newtownabbey Borough Council
- Ards and North Down Borough Council
- Armagh City, Banbridge and Craigavon Borough Council
- Belfast City Council
- Causeway Coast and Glens Borough
- Derry City and Strabane District Council
- Fermanagh and Omagh District Council
- Lisburn and Castlereagh City Council
- Mid and East Antrim Borough Council
- Mid Ulster District Council -Dungannon
- Newry, Mourne and Down District Council

Annex 2

Scotland

- Aberdeen City Council
- Aberdeenshire Council
- Angus Council
- · Argyll and Bute Council
- City of Edinburgh Council
- Clackmannanshire Council
- · Comhairle nan Eilean Siar
- Dumfries and Galloway Council
- Dundee City Council
- East Ayrshire Council
- East Dunbartonshire Council
- East Lothian Council
- East Renfrewshire Council
- Falkirk Council
- Fife Council
- Glasgow City Council
- Inverclyde Council
- Midlothian Council
- North Ayrshire Council
- North Lanarkshire Council
- Orkney Islands Council
- Perth and Kinross Council
- Renfrewshire Council
- Scottish Borders Council
- Shetland Islands Council
- South Ayrshire Council
- South Lanarkshire Council
- Stirling Council
- The Highland Council
- The Moray Council
- West Dunbartonshire Council
- West Lothian Council

Wales

- Blaenau Gwent County Borough Council
- Bridgend County Borough Council
- Caerphilly County Borough Council
- Cardiff Council
- Carmarthenshire County Council
- Ceredigion County Council
- Conwy County Borough Council
- Denbighshire County Council
- Flintshire County Council
- Gwynedd Council
- Isle of Anglesey County Council
- Merthyr Tydfil County Borough Council
- Monmouthshire County Council
- Neath Port Talbot Council
- Newport City Council
- Pembrokeshire County Council
- Powys County Council
- Rhondda Cynon Taf County Borough Council
- Swansea Council
- Torfaen County Borough Council
- Vale of Glamorgan Council
- Wrexham County Borough Council