

Licensing and Regulatory Committee



St Edmundsbury
BOROUGH COUNCIL

Title:	Agenda		
Date:	Tuesday 3 July 2018		
Time:	5.00 pm		
Venue:	Conference Chamber West (F1R09) West Suffolk House Western Way Bury St Edmunds, IP33 3YU		
Full Members:	<div><div>Chairman To be appointed</div><div>Vice-Chairman To be appointed</div><div><div><u>Conservative Members (11)</u></div><div>Sarah Broughton</div><div>Mike Chester</div><div>Mary Evans</div><div>Susan Glossop</div><div>Wayne Hailstone</div><div>Beccy Hopfensperger</div></div><div><div><u>Charter Group Member (1)</u></div><div>Max Clarke</div></div><div><div><u>Haverhill Indys Group (1)</u></div><div>John Burns</div></div></div> <div><div><u>Conservative Members (4)</u></div><div>Paula Fox</div><div>Ian Houlder</div></div> <div><div><u>Charter Group Member (1)</u></div><div>Diane Hind</div></div> <div><div><u>Haverhill Indys Group (1)</u></div><div>Tony Brown</div></div> <div><div><u>Conservative Members (4)</u></div><div>Elaine McManus</div><div>Patricia Warby</div></div>		
Substitutes:			
Interests – Declaration and Restriction on Participation:	Members are reminded of their responsibility to declare any disclosable pecuniary interest not entered in the Authority's register or local non pecuniary interest which they have in any item of business on the agenda (subject to the exception for sensitive information) and to leave the meeting prior to discussion and voting on an item in which they have a disclosable pecuniary interest.		
Quorum:	Five Members		
Committee administrator:	Christine Brain Democratic Services Officer (Scrutiny) Tel: 01638 719729 Email: christine.brain@westsuffolk.gov.uk		

Public Information



St Edmundsbury
BOROUGH COUNCIL

Venue:	West Suffolk House Western Way Bury St Edmunds Suffolk IP33 3YU	Tel: 01284 757120 Email: democratic.services@westsuffolk.gov.uk Web: www.stedmundsbury.gov.uk
Access to agenda and reports before the meeting:	Copies of the agenda and reports are open for public inspection at the above address at least five clear days before the meeting. They are also available to view on our website.	
Attendance at meetings:	The Borough Council actively welcomes members of the public and the press to attend its meetings and holds as many of its meetings as possible in public.	
Public participation:	<p>Members of the public who live or work in the Borough are invited to put one question or statement of not more than three minutes duration relating to items to be discussed in Part 1 of the agenda only. If a question is asked and answered within three minutes, the person who asked the question may ask a supplementary question that arises from the reply.</p> <p>A person who wishes to speak must register at least 15 minutes before the time the meeting is scheduled to start. There is an overall time limit of 15 minutes for public speaking, which may be extended at the Chairman's discretion.</p>	
Disabled access:	<p>West Suffolk House has facilities for people with mobility impairments including a lift and wheelchair accessible WCs. However in the event of an emergency use of the lift is restricted for health and safety reasons.</p> <p>Visitor parking is at the car park at the front of the building and there are a number of accessible spaces.</p>	
Induction loop:	An Induction loop is available for meetings held in the Conference Chamber.	
Recording of meetings:	<p>The Council may record this meeting and permits members of the public and media to record or broadcast it as well (when the media and public are not lawfully excluded).</p> <p>Any member of the public who attends a meeting and objects to being filmed should advise the Committee Administrator who will instruct that they are not included in the filming.</p>	

Personal Information	<p>Any personal information processed by Forest Heath District Council or St Edmundsbury Borough Council arising from a request to speak at a public meeting under the Localism Act 2011, will be protected in accordance with the Data Protection Act 2018. For more information on how we do this and your rights in regards to your personal information and how to access it, visit our website: https://www.westsuffolk.gov.uk/Council/Data_and_information/howweuseinformation.cfm or call Customer Services: 01284 763233 and ask to speak to the Data Protection Officer.</p>
-----------------------------	---

Agenda

Procedural Matters

Part 1 - Public

1. Election of Chairman 2018-2019

2. Election of Vice-Chairman 2018-2019

3. Substitutes

4. Apologies for Absence

5. Minutes

1 - 4

To confirm the minutes of the meeting held on 10 April 2018 (copy attached).

6. Public Participation

Members of the public who live or work in the Borough are invited to put one question or statement of not more than 3 minutes duration relating to items on Part 1 of the agenda only. If a question is asked and answered within 3 minutes the person who asked the question may ask a supplementary question that arises from the reply. A person wishing to speak must register to speak at least 15 minutes before the meeting is scheduled to start. There is an overall time limit of 15 minutes for public speaking which may be extended at the Chairman's discretion.

7. West Suffolk Local Air Quality - Progress Report (2017-2018)

5 - 112

Report No: **LIC/SE/18/004**

8. West Suffolk Food Safety Services Plan 2018-2019

113 - 142

Report No: **LIC/SE/18/005**

Part 2 – Exempt

NONE

Licensing and Regulatory Committee



Minutes of a meeting of the **Licensing and Regulatory Committee** held on
Tuesday 10 April 2018 at 5.00 pm in **Conference Chamber East, West**
Suffolk House, Western Way, Bury St Edmunds IP33 3YU

Present: **Councillors**

Chairman Frank Warby

John Burns
Sarah Broughton
Mike Chester
Mary Evans
Wayne Hailstone

Beccy Hopfensperger
Margaret Marks
David Nettleton
Richard Rout
Peter Thompson

Substitutes attending:

Patricia Warby

By Invitation:

Susan Glossop

85. Apologies for Absence

Apologies for absence were received from Councillor Clive Springett.

86. Substitutes

The following substitution was declared:

Councillor Patricia Warby for Councillor Clive Springett.

87. Public Participation

There were no questions/statements from members of the public.

88. Minutes

The minutes of the meeting held on 31 October 2017 were unanimously accepted by the Committee as an accurate record and signed by the Chairman.

89. Hackney Carriage Fare Review 2018

[Councillor Beccy Hopfensperger arrived at 5.05pm during the discussion and subsequent voting on this item]

The Committee received Report No: LIC/SE/18/002, which asked members to consider the proposed hackney carriage fare alignments. It was reported that Section 65 of the Local Government (Miscellaneous Provisions) Act 1976 enabled St Edmundsbury Borough Council, at its discretion to fix and vary the tariff for Hackney Carriages that were licenced by the Council.

Under the Council's Constitution, the Committee could set or refuse hackney fares, and reviewed annually. However, on this occasion, the review was anticipating the alignment of the fares in respect of the "Single Council approach".

The tariffs for both St Edmundsbury Borough Council and Forest Heath District Council differed widely. Therefore, it was proposed that fees should be aligned in two stages, which was set out within the report. A number of appendices were also attached to Report No: LIC/SE/18/002, as follows:

- (Appendix 1) – Current fare cards;
- (Appendix 2) – Proposed fare cards;
- (Appendix 3) – Fare comparisons;
- (Appendix 4) – Consultation form to all West Suffolk Drivers; and
- (Appendix 5) – Consultation raw data.

The Committee was asked to consider the following two options (see below), which were aimed at staging the changes to fares in a way that the Council could achieve its goal of aligning fares for a Single Council without negatively affecting the trade. It was also asked to consider which fares would be preferable to the public and the trade by April 2019:

Option 1: Approve the advertising of the proposed new Hackney Carriage fares for St Edmundsbury; or

Option 2: Approve the advertising of the proposed new Hackney Carriage fares devised for St Edmundsbury, and recommend which set of fares to be considered for Stage 2 to be in place for Single Council on 1 April 2019.

The Licensing Team Leader wished to stress to members that the proposed fare figures (Appendix 2) had been pulled together by members of the hackney trade (the trade) and not council officers. She explained in detail that the council had engaged with the trade at an early stage by asking the trade to come in and help the council to look at aligning the fares and the amount of tariffs, as far as possible, in a joint effort to close the current gaps for running miles prices/flags between the Forest Heath trade and St Edmundsbury trade, prior to Single Council. The fares being proposed by the trade had also been scrutinised and overseen by the councils meter agents (Digitax and Panther Taxis), who calibrated all hackney meters for the council prior to being presented to the Committee.

The Committee considered the report in detail and asked a number of questions, to which responses were provided.

Some members expressed their disappointment that the proposed fares were still worked out in yards and not miles which was confusing, including the

initial waiting times; that the whole fare structure was wrong; and were not happy with the suggested increases and felt they should be capped as it wanted to look after its residents who wanted to use taxis in the evening.

In response, the Licensing Team Leader reiterated to the committee that the St Edmundsbury hackney trade had collectively agreed the proposed new tariffs, which still had to be consulted on with the public. Furthermore, there had not been a fare increase since 2015.

Some members of the committee stated that they were struggling to understand the figures, which they felt were outdated, and that they now had a chance to reform the fares before Single Council in 2019.

During discussions the committee admitted it did not have a thorough understanding/knowledge of how the fares were calculated. In response the Licensing Team Leader explained how the yardage and waiting times were reached. She then informed the committee that by law the council had to consult the public on the proposed fare increases, and how the fare meters were set up and calibrated using yards and not miles nationally. However, King's Lynn Hackney Carriage Trade had changed their fares to miles.

She reiterated that due to timing issues, the meeting this evening was about aligning the tariffs for 2019, and the trade was proposing having three tariffs moving forward rather than the current six tariffs which was confusing. The council could then look at remodelling the fare tariffs from 2019 onwards.

Councillor Peter Thompson questioned whether it would not be easier to go with option 1 (approve the advertising of the proposed new hackney carriage fares for St Edmundsbury), and then stage 2 at a later date, which was supported by Councillor David Nettleton.

Councillor Margaret Marks then further suggested that officers could explore the King's Lynn Hackney Fares model, which the Licensing Team Leader had explained earlier was using miles instead of yards, which was supported by Councillor Mary Evans.

It was then proposed by Councillor Peter Thompson, seconded by Councillor David Nettleton and with the vote being unanimous, it was

RESOLVED:

That:

- 1) Option 1, as set out in Paragraph 3.1.2 to Report No: LIC/SE/18/002, be approved, and that officers also be asked to look further into the King's Lynn Hackney Carriage Fare model prior to Single Council.
- 2) Subject to the statutory procedure relating to public objections, the effective date of the implementation of the new Hackney Carriage fares increase be on 4 June 2018.

90. **Proposals to Declare an Air Quality Management Area Designation on Sicklesmere Road, Bury St Edmunds**

The Committee received Report No: LIC/SE/18/003, which updated members on the findings of the external consultation on proposals to declare an Air Quality Management Area (AQMA) on Sicklesmere Road, Bury St Edmunds. Based on the statutory guidance under the Regulations and following discussion with key stakeholders, consultation was undertaken with both statutory and non-statutory consultees including the relevant District and County Councillors, properties within the proposed AQMA, Suffolk County Council Highways and the planning officer and planning agent for the Abbotts Vale development. The consultation provided respondents with the opportunity to make any representation with respect to the proposed designation.

The results of the external consultation were set out in the report, and based on the outcome of the consultation, the Committee was asked to approve the declaration of the AQMA designation on Sicklesmere Road, Bury St Edmunds as laid out in the Order attached as Appendix A to the report.

The Committee considered the report and asked questions to which responses were provided.

Councillor Sarah Broughton informed the Committee that she supported the proposal for an AQMA on Sicklesmere Road. She explained that her ward of Great Barton had an AQMA and the Steering Group was working well in supporting the development of the AQMA Action Plan.

Councillor David Nettleton responded by stating that the council should be looking at the symptoms, and not the disease. He explained that there would be more AQMA's needed in the future if the council did not start tackling the cause, by taking urgent action to reduce the use of cars.

It was then proposed by Councillor Sarah Broughton, seconded by Councillor David Nettleton and with the vote being unanimous, it was

RESOLVED:

That based on the review and findings of the consultation, the declaration of the Air Quality Management Area designation on Sicklesmere Road, Bury St Edmunds, as shown in Appendix A to Report No: LIC/SE/18/003, be approved.

The Meeting concluded at 5.38 pm

Signed by:

Chairman

Licensing and Regulatory Committee



St Edmundsbury
BOROUGH COUNCIL

Title of Report:	West Suffolk Local Air Quality Progress Report (2017-2018)
Report No:	LIC/SE/18/004
Portfolio Holder:	Councillor Alaric Pugh Portfolio Holder for Planning and Growth Tel: 07930 460899 Email: Alaric.pugh@stedsbcc.gov.uk
Lead officer:	Matthew Axton Environment Officer Tel: 01284 757041 Email: matthew.axton@westsuffolk.gov.uk
Purpose of report:	To report the work undertaken during 2017 to meet Local Air Quality regulations across the Borough including the specific work in relation to the Great Barton Air Quality Management Area.
Recommendation:	Licensing and Regulatory Committee: It is <u>RECOMMENDED</u> that the Committee: (1) <u>Notes</u> and supports the work undertaken in order to improve local air quality in West Suffolk; and (2) <u>Supports</u> the Great Barton Air Quality Management Area Action Plan.
Key Decision: <i>(Check the appropriate box and delete all those that <u>do not</u> apply.)</i>	<i>Is this a Key Decision and, if so, under which definition?</i> Yes, it is a Key Decision - <input type="checkbox"/> No, it is not a Key Decision - <input checked="" type="checkbox"/>

Consultation:		<ul style="list-style-type: none"> • Consultation required with the Department of Environment (Defra) to approve technical elements of the Annual Status Report. • Consultation with key stakeholders to approve Great Barton Air Quality Management Area Action Plan including residents of Great Barton. 	
Alternative option(s):		N/A	
Implications:			
Are there any financial implications? If yes, please give details		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> <ul style="list-style-type: none"> • Financial costs in officer time, possible additional monitoring and possible commissioning of external studies or modelling to confirm the benefits of measures identified within Great Barton AQMA Action Plan. 	
Are there any staffing implications? If yes, please give details		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> <ul style="list-style-type: none"> • Any additional work will be covered by existing officers. 	
Are there any ICT implications? If yes, please give details		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> <ul style="list-style-type: none"> • 	
Are there any legal and/or policy implications? If yes, please give details		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> <ul style="list-style-type: none"> • 	
Are there any equality implications? If yes, please give details		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> <ul style="list-style-type: none"> • 	
Risk/opportunity assessment:		<i>(potential hazards or opportunities affecting corporate, service or project objectives)</i>	
Risk area	Inherent level of risk (before controls)	Controls	Residual risk (after controls)
Statutory Responsibilities	Medium	Delivering the statutory responsibilities will help reduce the inherent level of risk.	Low
Reputational	Medium	The Councils' work will help achieve a credible pathway to improving air quality.	Low
Financial	Low	Cost-benefit of key work will continue to be reviewed and adjusted.	Low
Ward(s) affected:		All Wards are affected by air quality, and specifically Great Barton Ward in relation to the AQMA Action Plan.	
Background papers:		None	
Documents attached:		Appendix 1 – 2018 Air Quality Annual Status Report (ASR) Appendix 2 – Draft Great Barton Air Quality Management Area Action Plan.	

1. Key issues and air quality background to recommendation(s)

- 1.1 Air quality has direct implications for human health. Research shows that poor air quality can reduce the quality of life by causing health problems, especially in those who are more vulnerable such as children, the elderly and those with pre-existing health conditions. There is considerable research showing a link between exposure to air pollution and effects on health.
- 1.2 Improving the air quality will help to improve the long term health of our local communities, makes our towns more attractive places to visit and therefore improves the local economy.
- 1.3 The Air Quality Regulations 2000 require all local authorities in the UK to review and assess air quality within their area. West Suffolk councils are the lead regulators within their administrative areas with respect to the management of local air quality. Officers in Planning and Regulatory Services carry out various activities to fulfil these responsibilities. This includes monitoring local air quality, declaring Air Quality Management Areas (such as within Great Barton), implementing any statutory and non-statutory actions for the purpose of improving air quality, providing advice on air quality and development.
- 1.4 As part of our statutory duties, the council prepares an annual report for submission to the Department for the Environment, Food and Rural Affairs (Defra), a copy of which is attached (**Appendix 1**). The report follows the format required by Defra and is of a technical nature. However, the key issues covered in the report are set out below.
- 1.5 The key pollutant of concern locally is Nitrogen Dioxide (NO₂), which is primarily caused by emissions from vehicle exhausts, for which the national annual mean objective (threshold) is 40 microgrammes per metre cubed (µg/m³) to be applied at the façade of residential properties. An hourly objective also exists for NO₂, to be applied along busy shopping streets, and should be considered where the annual mean level is 60 µg/m³ or greater. There were 24 monitoring sites within St Edmundsbury during 2017.
- 1.6 Road transport is a major source of air pollution both nationally and locally. West Suffolk councils work with other organisations to maintain and monitor the quality of air in the locality. Suffolk County Council and the Highways Agency are key partners and work with Council Officers to secure good air quality.
- 1.7 Defra have continued to develop a national strategy “UK plan for tackling roadside nitrogen dioxide concentrations”, published July 2017. Twenty-eight Local Authorities were originally named within the plan, with an additional thirty three being added after a High Court ruling in February 2018. These authorities have significant ongoing air quality problems as identified by Defra modelling and are required to develop local assessments and plans to achieve the statutory nitrogen dioxide limits in the shortest time possible. No Suffolk local authorities are named within the national strategy.

- 1.8 A further national document that is currently being consulted on is the "Draft Clean Air Strategy". This document aims to tackle a broad range of pollution sources, including domestic, industrial, farming and transport.

2. Outcomes for 2017-2018

- 2.1 For the majority of the Borough, air quality remains good, being below national limits, and continues to show a long term trend of slight year on year improvement. However, we continue to undertake detailed monitoring throughout the Borough.
- 2.2 Only one monitored location in St Edmundsbury Borough Council was above the national annual mean objective for nitrogen dioxide in 2017. This was located in the newly formed Air Quality Management Area on Sicklesmere Road, Bury St Edmunds and recorded a value of 44.7 µg/m³. This Committee will remember that the declaration for the Sicklesmere Road AQMA was only approved by this Committee in April of this year (Report No: LIC/SE/18/003) and work on the associated Action Plan is only at a very early stage. Further updates on the Sicklesmere Road Action Plan will be provided in due course.
- 2.3 Work on the Great Barton Air Quality Management Area is discussed in Section 3 below.
- 2.4 Although levels of measured pollutants in all other areas of St Edmundsbury remain in compliance with the national objectives, your officers are aware that there are negative health impacts related to lower concentrations of certain pollutants, especially particulates. Therefore, work will continue to monitor and improve air quality further, as detailed in Section 4 below.
- 2.9 Other actions taken by your Officers over the past year included:
- Producing an Air Quality Improvement Plan which clearly sets out the statutory and non-statutory work that your Officers are currently undertaking; plan to undertake and aspire to achieve in the medium term. This is included as an Appendix to the Annual Status Report as provided.
 - Commenting on and influencing planning applications to ensure that they have minimum impact on Local Air Quality.
 - Requesting new developments are suitably equipped with electric vehicle charge points to encourage the faster uptake of zero emission vehicles and to ensure developments in the area are suitably futureproofed for the proposed phasing out of petrol and diesel only vehicles in 2040. We have achieved a number of successes in this regard securing charge points through conditions of planning consents. Examples include the provision of Rapid Electric Vehicle charge points at the proposed drive-through coffee outlet on Etna Road (DC/17/0438/FUL) and the coffee shop unit and drive-through facility on the Suffolk Business Park (DC/17/1469/FUL).

- Promotion of internal and external grants to assist companies (including taxi companies) in converting their fleet to low and zero emission vehicles.
- Promotion of zero emission electric vehicles to the general public.

3. Great Barton Air Quality Management Area Action Plan

- 3.1 Monitoring for nitrogen dioxide during 2017 in the Great Barton Air Quality Management Area (AQMA) has not shown any breach of the national objectives. However, it has been recognised that historical monitoring of the AQMA has not targeted the worst case scenarios at the façade of the properties and therefore new monitoring points were introduced at the beginning of 2018. Initial data from these new monitoring locations within the centre of the AQMA are demonstrating that the air quality objectives are being breached and therefore action remains relevant.
- 3.2 An Action Plan has been developed with the support of a steering group that has met on a number of occasions. The steering group consists of air quality Officers, a planning Officer, a County Council Highways Officer, the Ward Member, as well as representatives from the parish council, the neighbourhood plan committee, the local school and local residents.
- 3.3 A number of measures have been considered, some of which are not being pursued presently due to currently being impractical or not having a reasonable funding source (such as a Great Barton by-pass).
- 3.4 A number of measures are, however, being investigated, as detailed in the Action Plan. These include the moving of the pedestrian crossing, which is currently located immediately adjacent to the AQMA; and the improvement of the Thurston Road (Bunbury Arms) Junction of the A143. Both of these measures are being investigated in conjunction with the Suffolk County Council Highways officer.
- 3.5 Officers have identified a measure that has implications on a neighbouring authority. This being the Heavy Goods Vehicle weight restriction on the A1088 between Ixworth and Elmswell, which is preliminary within the Mid Suffolk administrative area. Officers at Suffolk County Council have yet to establish the purpose of the order although unspecified environmental reasons have been cited. County Council Officers have not been able to identify any physical restrictions that would necessitate this restriction.
- 3.6 The result of this restriction is that HGV traffic commencing in locations such as Stanton are not able to use the A1088 when trying to reach the A14 and consequently forced to use a longer route, often through Great Barton. This has a two-fold negative impact on the environment:
 - Additional HGV movements through an area where national air quality objectives are being breached, exacerbating this issue.
 - The greater distance creates additional carbon emissions which is contrary to the Suffolk ambition to be the Greenest County.

- 3.7 Officers have calculated that for approximately every 100 lorries per day travelling through the AQMA, 1 unit is added to the annual mean level of nitrogen dioxide recorded in the AQMA, using the emerging 2018 monitoring data.
- 3.7 Officers are aware that any change to this restriction would have potentially negative impacts on the village of Norton within the Mid Suffolk administrative area. However, this needs to be weighed up against the air quality level currently recorded in Great Barton.
- 3.8 Officers are therefore making a request to County Council Highways department, at a senior level, to review the HGV restrictions on the A1088, asking for confirmation of the environmental impacts that this restriction supports and how they are judged to outweigh the air quality concerns in Great Barton.

4. Next Steps

- 4.1 Officers will continue to undertake the following activities:
- Continue monitoring levels of nitrogen dioxide throughout the Borough.
 - Form a Steering Group and progress the Action Plan for the Sicklesmere Road Air Quality Management Area.
 - Undertake Consultation on and start implementing actions within the Great Barton AQMA Action Plan (if approved by this Committee).
 - Work with air quality and planning colleagues across Suffolk to ensure standardised requirements for electric vehicle charging for new planning applications across the County.
 - Continue to promote grants for business fleet improvements.
 - Produce business cases for further investment in electric vehicle charging infrastructure.
 - Engage with stakeholders in areas where there may be concern to explore the need for further action.

5. Additional supporting information

- 5.1 **Appendix 1** - 2018 Air Quality Annual Status Report (ASR) In fulfilment of Part IV of the Environment Act 1995 Local Air Quality Management. Provided separately.
- 5.2 **Appendix 2** – Draft Great Barton Air Quality Management Area Action Plan. In fulfilment of Part IV of the Environment Act 1995 Local Air Quality Management. Provided separately.

Forest Heath District and St Edmundsbury Borough councils

Forest Heath & St Edmundsbury councils



2018 Air Quality Annual Status Report (ASR)

In fulfilment of Part IV of the
Environment Act 1995
Local Air Quality Management

June 2018

Forest Heath District and St Edmundsbury Borough councils

Local Authority Officer	Matthew Axton
Department	Environment & Energy Team, Planning & Regulatory Services
Address	<p>Forest Heath District Council District Offices College Heath Road Mildenhall Suffolk IP28 7EY</p> <p>St Edmundsbury Borough Council West Suffolk House Western Way Bury St Edmunds Suffolk IP33 3YU</p>
Telephone	01284 757041
E-mail	environment@westsuffolk.gov.uk
Report Reference number	ASR 2018
Date	June 2018

Executive Summary: Air Quality in Our Area

Air Quality in West Suffolk

Air pollution is associated with a number of adverse health impacts. It is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. There is also often a strong correlation with equalities issues, because areas with poor air quality are also often the less affluent areas^{1,2}.

The annual health cost to society of the impacts of particulate matter alone in the UK is estimated to be around £16 billion³.

West Suffolk is Forest Heath District Council (FHDC) and St Edmundsbury Borough Council (SEBC) working together, although the two existing councils will cease to exist and a new single West Suffolk council will be created in April 2019. The area is a mix of market towns (Brandon, Bury St Edmunds, Haverhill, Mildenhall and Newmarket) and more rural village communities. The regionally important strategic road links of the A11 and A14 also cross the area.

The main source of pollution in the area is road traffic and this is generally worst in the market towns. We monitor for the pollutant Nitrogen Dioxide, which is considered the main pollutant of concern for road vehicles and is particularly linked to Heavy Goods Vehicles (HGVs) and diesels. Consequently, the majority of our monitoring is adjacent to busy roads within our market towns.

Other pollutants, such as particulates, sulphur dioxide and carbon monoxide, have been considered and assessed historically and confirmed as not being at risk of exceeding their respective air quality objectives.

Air quality in West Suffolk is generally good and continuing to show long term improvement at monitored locations throughout the area. However, the importance of continuing to improve the local air quality is at a higher profile than ever before.

¹ Environmental equity, air quality, socioeconomic status and respiratory health, 2010

² Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006

³ Defra. Abatement cost guidance for valuing changes in air quality, May 2013

Forest Heath District and St Edmundsbury Borough councils

Each town within the area has its own unique air quality issues and these are summarised below. There is also significant monitoring in the village of Great Barton which is also discussed below:

- **Brandon** continues to show gradual long term improvement in air quality although the levels of traffic travelling through the town on the A1065 are still a concern to the residents and their representatives. None of the monitor locations failed the national set air quality objectives.
- **Bury St Edmunds** is the only town in West Suffolk to show exceedances of the air quality objective for Nitrogen Dioxide. Exceedances were recorded along Sicklesmere Road (A134) to the south of the town. This was the third year running that exceedances were recorded on Sicklesmere Road and, as recommended in our 2017 ASR, an Air Quality Management Area (AQMA) has been declared here. A long term solution is available for Sicklesmere Road in the form of a relief road associated with the South East Bury strategic growth area; however, we still consider it prudent to declare an AQMA to ensure that procedures are in place should the development be delayed or postponed for any reason and short term solutions can be considered.
- **Great Barton** is a village to the north east of Bury St Edmunds with a main road (A143) cutting through it. A row of cottages either side of, and including, the Post Office are situated close to this road. An AQMA was in place between 2009 and 2012 when it was revoked on a technicality. It was re-declared in April 2017 and remains in place. West Suffolk are publishing the action plan for this AQMA in parallel with this report, following three steering group meetings since the declaration. For detailed actions relating to the Great Barton Action plan, please see the main section of the report. Recorded levels of Nitrogen Dioxide pollution in 2016 were slightly below the annual mean objective but new, better positioned, monitoring commenced in January 2018 and indicates that the objective is still being breached.
- **Haverhill** monitoring continues to show compliance with the annual air quality objectives in all locations. The main area of concern is Withersfield Road (A1307) where levels have been close to the objectives in recent years. A north west Haverhill relief road has planning permission linked to a strategic housing site. The relief road must be finished within 5 years of the

Forest Heath District and St Edmundsbury Borough councils

commencement of the strategic housing development, which commenced in March 2018 and will therefore be delivered by March 2023 at the latest.

- **Mildenhall** continues to show concentrations of pollutants within the air quality objective levels, however, the site at Kingsway (MLD3) doesn't fit the long term trend of declining pollution levels, with 2017 monitoring being the highest concentration recorded since 2012.
- **Newmarket** has shown steady air quality improvements since the declaration of an AQMA along the High Street and Old Station Road in 2009. The AQMA was reduced in size to reflect this improvement in April 2017. The AQMA has been retained along Old Station Road due to insufficient confidence in the data along this road; however, further monitoring was added on Old Station Road at the beginning of 2016 and 2017 to rectify this data gap. None of the new locations have shown an exceedance of the air quality objectives. West Suffolk will consider revoking the AQMA if results from 2018 continue to show compliance with the objectives.

There remains local concern around vehicle idling in the taxi rank on the High Street. The West Suffolk Environment Team and the Licensing Team have both taken action to reduce this activity and the monitoring point at this location showed the greatest percentage drop from 2016 to 2017 in the Forest Heath District.

As most of the pollution within West Suffolk originates from road traffic, West Suffolk works closely with local Highway Authority, Suffolk County Council, who have a designated point of contact for air quality matters. We also work closely with the Local Planning Authority to ensure new developments are appropriately controlled and mitigation is provided where required.

Actions to Improve Air Quality

West Suffolk have produced an Air Quality Improvement Plan, which clearly lists the actions that West Suffolk are undertaking, planning to undertake, and aspire to undertake to tackle air quality. This document is included as Appendix F of this report and will be available on our website.

Forest Heath District and St Edmundsbury Borough councils

Zero Emission Vehicles

West Suffolk councils have focused on campaigns to increase the awareness of zero emission electric vehicles throughout 2017, undertaking the following actions:

- **Electric Vehicle Show** – In August 2017 we held our second electric vehicle showcase in the Arc shopping centre in Bury St Edmunds.

The Arc is West Suffolk's most popular shopping centre; with a footfall of approximately 28,000 on the day West Suffolk staged the event. We showcased a variety of zero emission vehicles, including cars and vans, with the aim of changing people's preconceptions about electric vehicles and giving people the chance to discuss air quality with officers from the Council. Following the success of this event, we anticipate organising again for 2018.



- **Charge Point Installation** – We continue to provide EV charge points in our public car parks in Haverhill, Newmarket and Bury St Edmunds. We have also made a bid to OLEV for funding for On Street Charge point provision, as well as working on another funded scheme for rapid charge points in partnership with other Suffolk and Norfolk local authorities. We expect these schemes to be delivered in 2018.
- **Charge Points through Planning** – We continue to request charge points through the planning process on all major planning applications. This has now secured a number of charge points through planning conditions attached to

Forest Heath District and St Edmundsbury Borough councils

residential and commercial applications, as well as publically accessible 'rapid' chargers in three separate applications in Bury St Edmunds and Newmarket.

Taxi Fleet Efficiency Improvements

A number of measures have been taken to improve the efficiency of the taxi fleet throughout West Suffolk including writing to all Hackney Carriage drivers in Forest Heath to remind them to not idle within the taxi ranks, together with an increased on street presence from the Licensing Team and the addition of unnecessary idling as an offence within the taxi drivers handbook. This has resulted in the monitoring point at the Newmarket taxi rank having the largest percentage decrease in concentrations of Nitrogen Dioxide in Forest Heath (9% reduction).

West Suffolk has also assisted in the development of targeted literature for taxi drivers promoting funding for Electric Vehicles. West Suffolk also provide grants for carbon reduction measures which we have promoted to taxi drivers with the added benefit of air quality improvements.



New Infrastructure

The Bury St Edmunds Eastern Relief Road (Rougham Tower Avenue) which will help to aid traffic congestion in the east of the town opened in October 2017.

Major strategic housing development sites, such as North West Haverhill (where development commenced in March 2018) and South East Bury St Edmunds will deliver relief roads which will ease areas of air quality concern in the medium term.

Conclusions and Priorities

Air Quality in West Suffolk remains largely good and the number of exceedances of the annual mean objective for Nitrogen Dioxide remains minimal. The action plan for the Great Barton AQMA is being published in parallel with this report whilst work on the action plan for the recently declared Sicklesmere Road AQMA will be commencing shortly.

The Newmarket AQMA action plan has not progressed, as monitoring continues to show compliance in this area and action is not required to reduce levels in the

Forest Heath District and St Edmundsbury Borough councils

specific AQMA area. However, the Environment Team do, and will continue to, take action to reduce levels of pollution in Newmarket, as well as all other areas, through both general measures and focussed measures where these are available.

The councils will continue to work to improve the provisions for electric vehicles in West Suffolk in partnership with Suffolk County Council and private companies. The number of charge points in domestic, workplace and public settings is increasing due to measures taken by West Suffolk and will continue to significantly increase over the coming years. Further electric vehicle showcase events are planned for the future.

The continued growth in housing and business activity in West Suffolk will be the main challenge when tackling air quality in the area. Construction has begun on a number of strategic housing development sites throughout West Suffolk as well as the Suffolk Business Park. Managing the additional traffic from these developments over the coming years will be essential in ensuring the continued good air quality in West Suffolk.

We are committed to continuing to monitor the local air quality throughout West Suffolk and to identifying schemes that can provide potential improvements either at any of our areas of concern or on an area wide basis.

Local Engagement and How to get Involved

As an individual there are many actions that you can take to improve the air quality and reduce air pollution. This will improve the quality of life for everyone, including you and your family. Below are a few suggestions of how to get involved:

- Consider purchasing an electric vehicle; the costs are reducing and the technology and infrastructure are making this technology more practical for more people.
- Use your car less. Try to walk, cycle, and use the bus or train wherever possible. Conventionally fuelled cars are particularly polluting over short journeys, so aim to cut these out first.
- Reduce emissions from your car by ensuring it is regularly serviced and well maintained, ensure you only carry the weight you need, and you drive in a gentle, steady manner.
- Don't unnecessarily idle your vehicle's engine when parked.

Forest Heath District and St Edmundsbury Borough councils

- When buying a traditionally fuelled vehicle consider the most fuel efficient petrol vehicle rather than buying a diesel vehicle.
- Encourage your employer, school or college to set up a Green Travel Plan.
- Car share, to reduce emissions and save money. See the Suffolk Car Share website for further details: www.SuffolkCarShare.com

There are no specific air quality campaign groups within West Suffolk, however, a number of local community groups have shown an interest in assisting to improve air quality in their areas and we are always happy to work with any organisation where air quality benefits are possible.

Table of Contents

Executive Summary: Air Quality in Our Area.....	i
Air Quality in West Suffolk	i
Actions to Improve Air Quality	iii
Conclusions and Priorities	v
Local Engagement and How to get Involved	vi
1 Local Air Quality Management.....	1
2 Actions to Improve Air Quality.....	2
2.1 Air Quality Management Areas.....	2
2.2 Progress and Impact of Measures to address Air Quality in West Suffolk.....	4
2.3 PM _{2.5} – Local Authority Approach to Reducing Emissions and/or Concentrations.....	12
3 Air Quality Monitoring Data and Comparison with Air Quality Objectives and National Compliance.....	13
3.1 Summary of Monitoring Undertaken	13
3.1.1 Automatic Monitoring Sites	13
3.1.2 Non-Automatic Monitoring Sites.....	13
3.2 Individual Pollutants	13
3.2.1 Nitrogen Dioxide (NO ₂).....	13
Appendix A: Monitoring Results	21
Appendix B: Full Monthly Diffusion Tube Results for 2017	32
Appendix C: Supporting Technical Information / Air Quality Monitoring Data QA/QC	36
Appendix D: Map(s) of Monitoring Locations and AQMAs	38
Appendix E: Summary of Air Quality Objectives in England.....	48
Appendix F: Air Quality Improvement Plan.....	49
Glossary of Terms	61

List of Tables

Table 2.1 – Declared Air Quality Management Areas.....	3
Table 2.2 – Progress on Measures to Improve Air Quality	7

List of Figures

Figure 1. Trends in Concentration of Air Pollution in Brandon (not adjusted to façade).....	14
Figure 2 Trends in Concentration of Air Pollution in Great Barton (not adjusted to façade of buildings).....	16

Forest Heath District and St Edmundsbury Borough councils

Figure 3. Trends in Concentration of Air Pollution in Haverhill (not adjusted to façade of buildings).	17
Figure 4. Trends in Concentration of Air Pollution on Newmarket High Street (not adjusted to façade of buildings)	19
Figure 5. Trends in Concentration of Air Pollution on Newmarket Old Station Road (not adjusted to façade of buildings)	20

1 Local Air Quality Management

This report provides an overview of air quality in West Suffolk (Forest Heath District Council and St Edmundsbury Borough Council administrative areas) during 2017. It fulfils the requirements of Local Air Quality Management (LAQM) as set out in Part IV of the Environment Act (1995) and the relevant Policy and Technical Guidance documents.

The LAQM process places an obligation on all local authorities to regularly review and assess air quality in their areas, and to determine whether or not the air quality objectives are likely to be achieved. Where an exceedance is considered likely the local authority must declare an Air Quality Management Area (AQMA) and prepare an Air Quality Action Plan (AQAP) setting out the measures it intends to put in place in pursuit of the objectives. This Annual Status Report (ASR) is an annual requirement showing the strategies employed by West Suffolk to improve air quality and any progress that has been made.

The statutory air quality objectives applicable to LAQM in England can be found in Table E.1 in Appendix E.

2 Actions to Improve Air Quality

2.1 Air Quality Management Areas

Air Quality Management Areas (AQMA) are declared when there is an exceedance or likely exceedance of an air quality objective. After declaration, the authority must prepare an Air Quality Action Plan (AQAP) within 12-18 months setting out measures it intends to put in place in pursuit of compliance with the objectives.

A summary of AQMAs declared by West Suffolk councils can be found in Table 2.1. Further information related to declared or revoked AQMAs, including maps of AQMA boundaries are available online at https://uk-air.defra.gov.uk/aqma/local-authorities?la_id=105 for Forest Heath District Council and https://uk-air.defra.gov.uk/aqma/local-authorities?la_id=255 for St Edmundsbury Borough Council Alternatively, see Appendix D: Map(s) of Monitoring Locations and AQMAs, which provides for a map of air quality monitoring locations in relation to the AQMAs.

Table 2.1 – Declared Air Quality Management Areas

AQMA Name	Date of Declaration	Pollutants and Air Quality Objectives	City / Town	One Line Description	Is air quality in the AQMA influenced by roads controlled by Highways England?	Level of Exceedance (maximum monitored/modelled concentration at a location of relevant exposure)				Action Plan		
						At Declaration		Now		Name	Date of Publication	Link
Newmarket AQMA (2017 Variation)	Declared 6 April 2009, Amended 18 April 2017	NO2 Annual Mean	Newmarket	Old Station Road from the Clock Tower Roundabout to the Junction with Rous Road, Newmarket, Suffolk	NO	40 (2009 – Not at relevant location for annual mean objective)	µg/m3	29.8 (at Façade)	µg/m3	N/A	N/A	www.westsuffolk/airquality
Great Barton AQMA	Declared 11th May 2011 Revoked 1st January 2013 Declared 18th April 2017	NO2 Annual Mean	Great Barton	An area incorporating Gatehouse Cottage and 1 to 8 The Street (A143), in the Parish of Great Barton.	NO	48.2 (2011)	µg/m3	36 (2017) new locations from 2018 suggest parts of AQMA still much greater than 40	µg/m3	Action Plan for Great Barton AQMA	2018	
Sicklesmere Road, Bury St Edmunds, AQMA	Declared 13th April 2018	NO2 Annual Mean	Bury St Edmunds	2 and 7 Sicklesmere Road and 28 Southgate House, Rougham Road, in the Parish of Bury St Edmunds (Southgate Ward)	NO	44.7	µg/m3	44.7	µg/m3	TBA	TBA - Declaration only occurred in April 2018 - Report to be produced	

☑ West Suffolk councils confirm the information on UK-Air regarding their AQMA(s) is up to date

2.2 Progress and Impact of Measures to address Air Quality in West Suffolk

Defra's appraisal of last year's ASR concluded that the report was acceptable and that West Suffolk councils should continue monitoring and submit the next Annual Status Report in 2018 (this document).

Specific points were raised as follows:

- Defra confirmed that if exceedances of the Annual Mean Objective for Nitrogen Dioxide were recorded on Sicklesmere Road in Bury St Edmunds for a further year, the Council should proceed to declaring an AQMA. A further year of exceedance was recorded in 2017 and the Council subsequently declared the AQMA on the 13th April 2018.
- Given the results of monitoring within the Newmarket AQMA, Defra recommended that *"the Local Authority consider revoking the Newmarket AQMA, if 2017 monitoring results also demonstrate concentrations within the AQMA below 36 µg/m³".* The results for 2017 did demonstrate concentrations below 36 µg/m³, however, we consider that, due to local concerns, a further years data is gathered prior to consulting on the revocation of the AQMA so that robust evidence can be presented.
- Defra recommended that all the values presented in Table A.3 (Annual Mean NO₂ Monitoring Results for the last 5 years) should be distance adjusted to a relevant receptor. However, given that the data has been presented without wholesale distance adjustment since reporting began it would be appropriate to keep the figures as unadjusted when presenting the yearly trends to enable consistency and clarity. The matter is also confused by some monitoring points being in locations that are relevant to both the hourly and annual objective. Distance adjustment will be undertaken in Table B.1 and where it is important in assessing a sites exceedance, or otherwise, of the objective.

West Suffolk has taken forward a number of direct measures during the current reporting year of 2017 in pursuit of improving local air quality. Details of all measures completed, in progress or planned are set out in Table 2.2.

Forest Heath District and St Edmundsbury Borough councils

More detail on these measures can be found in their respective Action Plans for the Great Barton AQMA and within the Air Quality Improvement Plan, included here as Appendix F. Key completed measures are:

- Continued promotion of zero emission Electric Vehicles (EVs) at an EV showcase event in the centre of Bury St Edmunds together with associated press and radio coverage.
- Securing of EV charge points through conditions on planning approvals for residential and commercial developments, including the securing of publically accessible rapid chargers at locations in both Bury St Edmunds and Newmarket.
- Opening of the Eastern Relief Road to relieve congestion and consequently improve air quality on the eastern side of Bury St Edmunds.
- Engagement with taxi drivers to reduce idling, especially in the Newmarket taxi rank, which has shown a 9% reduction in Nitrogen Dioxide levels from 2016 to 2017.

West Suffolk expects the following measures to be completed over the course of the next reporting year:

- Further promotion and enabling of zero emission EVs, including further EV showcases; the provision of a town centre rapid charger in Bury St Edmunds; as well as on street charging provision in a number of localities.
- Undertake campaigns to raise awareness of air quality issues, including an anti-idling campaign aimed primarily at schools.

West Suffolk's priorities for the coming year are to progress the actions associated with the Great Barton AQAP, develop an action plan for the newly created Sicklesmere Road AQMA and further promote and enable zero emission vehicles.

The principal challenges and barriers to implementation that West Suffolk anticipates facing is the lack of funding for the implementation of actions.

West Suffolk anticipates that many of the measures stated above and in Table 2.2 will help to achieve compliance in the AQMAs. However, West Suffolk anticipates that further additional measures not yet prescribed may be required in subsequent years to achieve compliance in Great Barton and Sicklesmere Road. The Newmarket AQMA

Forest Heath District and St Edmundsbury Borough councils

already demonstrates compliance with the Air Quality Objective and a specific action plan has not therefore been developed, however, a number of the general measures will help to further reduce the levels of pollution in this area.

Forest Heath District and St Edmundsbury Borough councils

Table 2.2 – Progress on Measures to Improve Air Quality

Measure No.	Measure	EU Category	EU Classification	Organisations involved and Funding Source	Planning Phase	Implementation Phase	Key Performance Indicator	Reduction in Pollutant / Emission from Measure	Progress to Date	Estimated / Actual Completion Date	Comments / Barriers to implementation
1	Electric Vehicle Charging Points through Planning	Promoting Low Emission Transport	Procuring alternative Refuelling infrastructure to promote Low Emission Vehicles, EV recharging, Gas fuel recharging	West Suffolk	2016	Ongoing	Number of relevant planning applications with conditions successfully applied	Increase uptake of zero emission vehicles	Implemented and conditions being successfully imposed	Ongoing	A number of charge points have been secured through planning for residential and commercial developments, including a number of publically accessible rapid charge points
2	Electric Vehicle Charging Infrastructure on council owned land	Promoting Low Emission Transport	Procuring alternative Refuelling infrastructure to promote Low Emission Vehicles, EV recharging, Gas fuel recharging	West Suffolk/Babergh Mid Suffolk Highways England providing funding for Rapid chargers	Ongoing	Summer 2018	Number of additional charge points installed	Increase uptake of zero emission vehicles	Site identified for Rapid charger in Bury St Edmunds	2018	Norfolk/Suffolk wide project progressing and expected to be delivered in 2018
3	Electric Vehicle Charging Infrastructure on council owned land	Promoting Low Emission Transport	Procuring alternative Refuelling infrastructure to promote Low Emission Vehicles, EV recharging, Gas fuel recharging	West Suffolk	Ongoing	2017	Number of additional charge points installed	Increase uptake of zero emission vehicles	Fast chargers installed in Bury St Edmunds, Haverhill and Newmarket	2017	A number of chargers installed in 2017. Further locations being considered for 2018/2019
4	On Street electric vehicle charging infrastructure	Promoting Low Emission Transport	Procuring alternative Refuelling infrastructure to promote Low Emission Vehicles, EV recharging, Gas fuel recharging	West Suffolk	Ongoing	2018	Number of additional charge points installed	Increase uptake of zero emission vehicles	Application submitted to OLEV	2018	

Forest Heath District and St Edmundsbury Borough councils

Measure No.	Measure	EU Category	EU Classification	Organisations involved and Funding Source	Planning Phase	Implementation Phase	Key Performance Indicator	Reduction in Pollutant / Emission from Measure	Progress to Date	Estimated / Actual Completion Date	Comments / Barriers to implementation
5	Electric Vehicle Showcase	Promoting Low Emission Transport	Other	West Suffolk	2016 and Ongoing	2016 to ongoing	Increased uptake in electric vehicles	Increase uptake of zero emission vehicles	Showcase undertaken in 2016 & 2017	Ongoing	2018 event being planned
6	Business Grant Promotions for businesses to move to ULEV	Promoting Low Emission Transport	Company Vehicle Procurement - Prioritising uptake of low emission vehicles	West Suffolk and BEE Anglia	2016	ongoing	Increased uptake in electric vehicles	Increase uptake of zero emission vehicles	Specific marketing designed and distributed to taxi drivers - Awaiting first successful applicant	Ongoing	
Page 29 ⁷	New taxi licensing conditions making idling in a taxi rank or on the highway a penalty within the taxi handbook, with the potential for penalty points to be added to the drivers council licence.	Promoting Low Emission Transport	Taxi Licensing conditions	West Suffolk	2017	2017	Reduction in Nitrogen Dioxide at Taxi rank locations	10% reduction in pollution at taxi rank	9% reduction in taxi rank	Conditions implemented in 2017	
8	Anti idling campaigns	Public Information	Via other mechanisms	West Suffolk	2018	2018	Reduction in idling at key locations		Materials being prepared	Sept-18	

Forest Heath District and St Edmundsbury Borough councils

Measure No.	Measure	EU Category	EU Classification	Organisations involved and Funding Source	Planning Phase	Implementation Phase	Key Performance Indicator	Reduction in Pollutant / Emission from Measure	Progress to Date	Estimated / Actual Completion Date	Comments / Barriers to implementation
9	Eastern Relief Road (Rougham Tower Avenue), Bury St Edmunds	Traffic Management	Strategic highway improvements, Re-prioritising road space away from cars, including Access management, Selective vehicle priority, bus priority, high vehicle occupancy lane	West Suffolk and Suffolk County Council	Completed	2016 / 2017	Road completed	Reduction in congestion	Road completed and open	Oct-17	
10	New High School	Traffic Management	Other	SEBC and Suffolk County Council	Completed	Completed	Reduced cross town travel during school drop-off and collection times	Reduction in congestion	Completed	Completed	
11	Eco driving courses for council staff	Vehicle Fleet Efficiency	Driver training and ECO driving aids	West Suffolk	Completed	Ongoing	Number of staff completing course	Reduced vehicle Emissions	Ongoing	Ongoing	
12	Promotion of better domestic solid fuel burning	Public Information	Via the Internet	West Suffolk	Completed	Ongoing	Lower emissions from private fuel burning (not measurable)		Promoted on West Suffolk website and via West Suffolk and Environmental Health Facebook pages	Ongoing	

Forest Heath District and St Edmundsbury Borough councils

Measure No.	Measure	EU Category	EU Classification	Organisations involved and Funding Source	Planning Phase	Implementation Phase	Key Performance Indicator	Reduction in Pollutant / Emission from Measure	Progress to Date	Estimated / Actual Completion Date	Comments / Barriers to implementation
13	South East Bury St Edmunds relief road	Traffic Management	Strategic highway improvements, Re-prioritising road space away from cars, including Access management, Selective vehicle priority, bus priority, high vehicle occupancy lane	West Suffolk / Suffolk County Council and Developer	Ongoing	2022	Measured concentration in Nitrogen Dioxide on Sicklesmere Road	TBC closer to opening date	Awaiting planning permission to be granted	2023	Completion of road prior to 400 dwellings completed to be a condition of the planning approval
Page 31 14	Haverhill north west relief road	Traffic Management	Strategic highway improvements, Re-prioritising road space away from cars, including Access management, Selective vehicle priority, bus priority, high vehicle occupancy lane	West Suffolk / Suffolk County Council and Developer	Ongoing	2023	Measured concentration in Nitrogen Dioxide on Withersfield Road	TBC closer to opening date - likely in the region of 20%	Development commenced March 2018	2023	Condition of planning requires completion within 5 years of commencement of development
15	Great Barton AQAP - Moving of the pedestrian crossing	Traffic Management	UTC, Congestion management, traffic reduction	Suffolk County Council	2018	2019	Reductions in Concentration s to below the objective	Greater reduction in concentrations than at other monitoring location in Great Barton. Study to quantify reduction being commissioned.	Broad feasibility study carried out	2019	Planning condition on DC/17/1166/FUL requires the provision of crossing points linking the existing footways of The Street

Forest Heath District and St Edmundsbury Borough councils

Measure No.	Measure	EU Category	EU Classification	Organisations involved and Funding Source	Planning Phase	Implementation Phase	Key Performance Indicator	Reduction in Pollutant / Emission from Measure	Progress to Date	Estimated / Actual Completion Date	Comments / Barriers to implementation
16	Great Barton AQAP - Improvement of 'Bunbury Arms' junction to Thurston	Traffic Management	Strategic highway improvements, Re-prioritising road space away from cars, inc Access management, Selective vehicle priority, bus priority, high vehicle occupancy lane	Suffolk County Council	2018-2020	2021	Monitoring of queues through Great Barton	To be confirmed.	Outline design completed	2021	Section 106 funding has been secured from developments in Thurston (within Mid Suffolk District Council). This will be the second scheme delivered through this funding.
17	Great Barton AQAP - Amendments to lorry restrictions on A1088	Freight and Delivery Management	Route Management Plans/ Strategic routing strategy for HGV's	Suffolk County Council	Unknown	Unknown	Reduction in lorries using the A143	Approximately 1µg/m ³ reduction for every 100 HGVs diverted per day.	None	Unknown	HGV restrictions on the A1088 mean more HGV's use the A143. Investigations ongoing into the reasoning for and current applicability of the restrictions on the A1088. It is recognised that this measure would have a potential negative impact outside of West Suffolk jurisdiction and would require very careful consideration and environmental assessment.

2.3 PM_{2.5} – Local Authority Approach to Reducing Emissions and/or Concentrations

As detailed in Policy Guidance LAQM.PG16 (Chapter 7), local authorities are expected to work towards reducing emissions and/or concentrations of PM_{2.5} (particulate matter with an aerodynamic diameter of 2.5µm or less). There is clear evidence that PM_{2.5} has a significant impact on human health, including premature mortality, allergic reactions, and cardiovascular diseases.

West Suffolk is taking the following measures to address PM_{2.5}:

We do not have the facility to measure PM_{2.5}, but given the relatively low recorded levels of Nitrogen Dioxide and DEFRA modelled levels of PM₁₀ we do not expect PM_{2.5} to be above guideline levels. However we believe that many of the measures listed in Table 2.2, above, would contribute to a reduction in exposure to PM_{2.5}, especially the measures promoting the uptake of zero emission vehicles and the promotion of better domestic solid fuel burning. We will continue to consult with Suffolk County Council Public Health colleagues and be advised by them, and national guidance, on any relevant measures that will reduce exposure.

3 Air Quality Monitoring Data and Comparison with Air Quality Objectives and National Compliance

3.1 Summary of Monitoring Undertaken

This section sets out what monitoring has taken place and how it compares with objectives.

3.1.1 Automatic Monitoring Sites

West Suffolk does not undertake automatic (continuous) monitoring.

National monitoring results are available at <https://uk-air.defra.gov.uk/>.

3.1.2 Non-Automatic Monitoring Sites

West Suffolk councils undertook non- automatic (passive) monitoring of NO₂ at 58 sites during 2017. Table A.1 in Appendix A shows the details of the sites.

Maps showing the location of the monitoring sites are provided in Appendix D.

Further details on Quality Assurance/Quality Control (QA/QC) for the diffusion tubes, including bias adjustments and any other adjustments applied (e.g. “annualisation” and/or distance correction), are included in Appendix C.

3.2 Individual Pollutants

The air quality monitoring results presented in this section are, where relevant, adjusted for bias, “annualisation” and distance correction. Further details on adjustments are provided in Appendix C.

3.2.1 Nitrogen Dioxide (NO₂)

Table A.2 in Appendix A compares the ratified and adjusted monitored NO₂ annual mean concentrations for the past 5 years with the air quality objective of 40µg/m³.

For diffusion tubes, the full 2017 dataset of monthly mean values is provided in Appendix B. All data on the below graphs is concentrations of Nitrogen Dioxide in µg/m³.

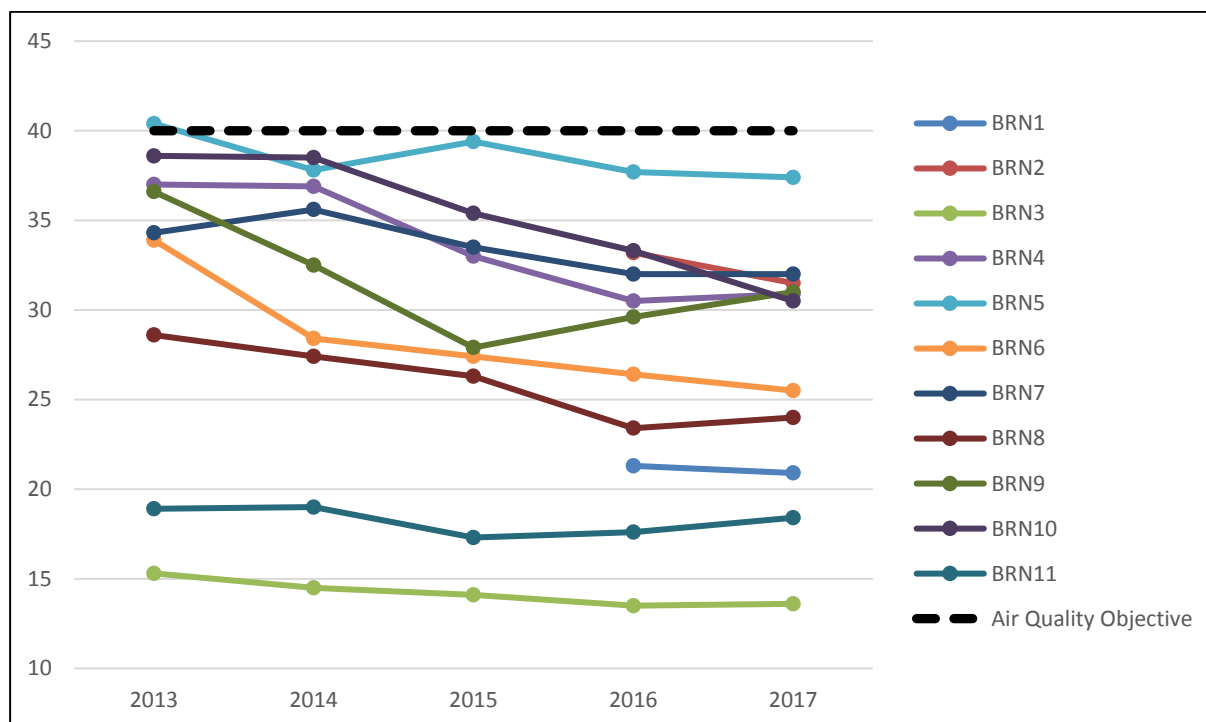
Brandon

Brandon continues to show gradual improvement in air quality as can be seen in Figure 1, below. All sites where monitoring has occurred over the last five years are

Forest Heath District and St Edmundsbury Borough councils

recording lower concentrations of pollutants now than in 2013. This reduction in pollution has been more noticeable in some sites than others; for example BRN10 ('Boots', High Street) has dropped by $8.1\mu\text{g}/\text{m}^3$ or 21% over 5 years whilst BRN5 (52 London Road) has only dropped by $3.0\mu\text{g}/\text{m}^3$ or 7%. None of the monitoring locations have exceeded the annual mean objective since BRN5 (52 London Road) recorded a very slight exceedance of $40.4\mu\text{g}/\text{m}^3$ (compared to an objective of $40.0\mu\text{g}/\text{m}^3$) in 2013, although this is not at a relevant receptor location. BRN5 remains the highest recorded monitoring location in Brandon at $37.4\mu\text{g}/\text{m}^3$, with no other monitoring locations being above $32.0\mu\text{g}/\text{m}^3$. It is therefore not considered necessary to undertake a detailed assessment in Brandon.

Figure 1. Trends in Concentration of Air Pollution in Brandon (not adjusted to façade)



However, we are aware that there the residents of Brandon and their representatives are still concerned by the level of traffic using the A1065 through the town, especially the levels of Heavy Goods Vehicles (HGVs). Residents also have concerns about the air quality given the volume of traffic. Recent Suffolk County Council traffic monitoring has shown that a proportion of traffic has, since the dualling of the A11, shifted from the A1065 London Road to the B1106 Bury Road, but that traffic using the High Street has remained relatively stable. The same monitoring conclude that the majority of the HGV traffic coming to Brandon does so for business uses and is not through traffic. We have continued to engage where possible to further reduce

Forest Heath District and St Edmundsbury Borough councils

the levels of pollution and have put up additional monitoring locations within Brandon following engagement during 2017.

Bury St Edmunds

Bury St Edmunds is the only town in West Suffolk to show exceedances of the annual mean air quality objective for Nitrogen Dioxide. Exceedances were recorded along Sicklesmere Road (A134) to the south of the town ($44.7\mu\text{g}/\text{m}^3$ - BSE1 at 2 Sicklesmere Road) which is within the newly declared AQMA.

All other locations were below the annual mean objective, although another 3 monitoring locations, including a second monitoring point within the Sicklesmere Road AQMA (BSE15) were within 10% of the objective. The other two sites, BSE6 (Kings Road Roundabout) and BSE9 (Fornham Road Tollgate) reduce to $34.4\mu\text{g}/\text{m}^3$ and $31.4\mu\text{g}/\text{m}^3$ respectively when distance adjusted to the nearest relevant receptor.

A number of new monitoring locations were introduced in 2015 and 2016 and a long term trend at these sites remains unclear given that only two or three years of data exists. However, where monitoring has been in place for at least 5 years, the trend does appear to be a slow reduction in concentrations of pollution.

No detailed assessment is considered necessary in Bury St Edmunds based on the 2017 monitoring results, although given the expected growth of Bury St Edmunds we will continue to undertake significant monitoring throughout the town.

Great Barton

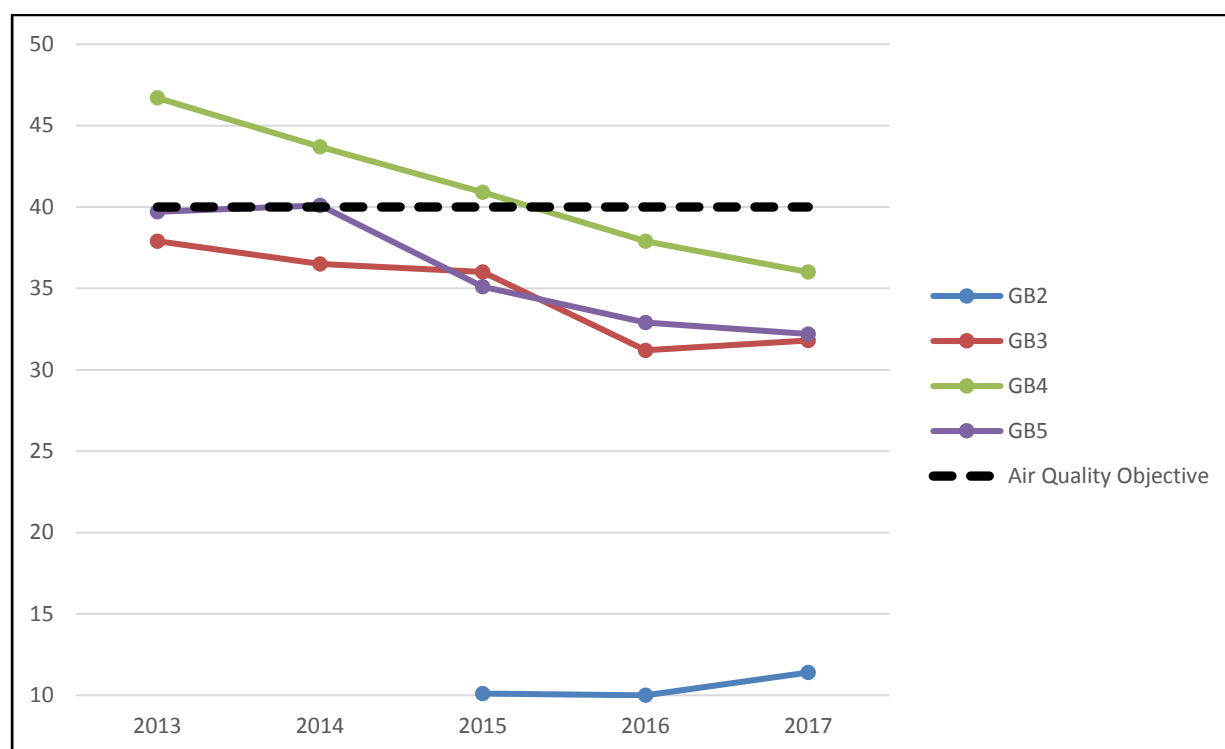
Significant monitoring continues in Great Barton along the main road (A143), which cuts through the village. A row of cottages either side of, and including, the Post Office are situated close to this road, in contrast to the majority of the housing in the village which is situated back from the main road. An AQMA was in place between 2009 and 2012 when it was revoked on a technicality. The AQMA was re-declared on the 18th April 2017 following a full review.

Monitoring in 2017 showed a continued reduction in recorded levels of Nitrogen Dioxide, with the levels at the AQMA (GB4) just below the annual mean objective for the second year, being $36.0\mu\text{g}/\text{m}^3$ in 2017. The reduction in concentrations of Nitrogen Dioxide at the AQMA has been significant and sustained, with a 23% reduction in the last 5 years at GB4.

Forest Heath District and St Edmundsbury Borough councils

However, the monitoring point for the AQMA has always been just beyond the end of the row of cottages that comprise the AQMA and therefore two additional monitoring points have been introduced within the main body of the AQMA at the start of 2018. Preliminary data from these new monitoring points suggests that pollution levels within the main AQMA area are likely to be greater than the AQO of $40\mu\text{g}/\text{m}^3$. The status of the AQMA will be reassessed in 2019 when the data from the two new monitoring points is available.

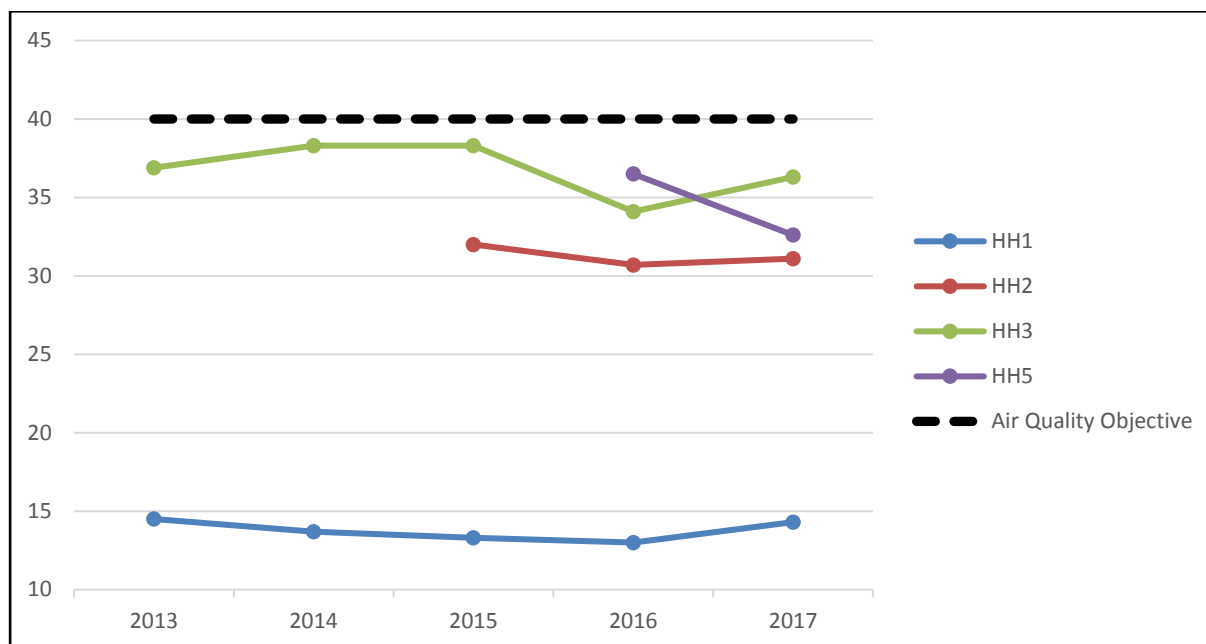
Figure 2 Trends in Concentration of Air Pollution in Great Barton (not adjusted to façade of buildings)



Haverhill

Monitoring in Haverhill continues to show compliance with the annual air quality objectives in all locations. The main area of concern is Withersfield Road (A1307) where levels have been close to the objectives in recent years with the highest recorded value of Nitrogen Dioxide being $36.3\mu\text{g}/\text{m}^3$ (HH3, 29 Withersfield Road). The long term monitoring at this location does not indicate a particular trend with levels fluctuating over the last 5 years.

Figure 3. Trends in Concentration of Air Pollution in Haverhill (not adjusted to façade of buildings).



A north west Haverhill relief road has planning permission linked to a strategic housing site. The relief road must be finished within 5 years of the commencement of the strategic housing development, which commenced in March 2018. The completion of the relief road is anticipated to significantly reduce the traffic, and therefore pollution levels on Withersfield Road.

As concentrations are below the objective and medium term improvements are expected, there is not considered the need for a detailed assessment in Haverhill.

Icklingham and Lakenheath

Monitoring in the villages of Icklingham and Lakenheath has recorded levels of nitrogen dioxide well within the objective levels. The concentrations recorded in Icklingham ($23.2\mu\text{g}/\text{m}^3$) were significantly below the AQO to confirm that no statutory problems exist and therefore monitoring will not be undertaken moving forward. Although monitoring in Lakenheath is also significantly below the AQO, monitoring will continue due to the potential for significant growth in the locality.

Mildenhall

Mildenhall continues to show concentrations of pollutants within the air quality objective levels, however, the site at Kingsway (MLD3) doesn't fit the long term trend of declining pollution levels that is apparent at many of the other locations throughout

Forest Heath District and St Edmundsbury Borough councils

West Suffolk, with 2017 monitoring ($36.4\mu\text{g}/\text{m}^3$) being the highest concentration recorded since 2012. The other two monitoring locations in Mildenhall were both new in 2016 and both show a slight increase in 2017 when compared to 2016, although it is difficult to make any conclusions regarding the long term trend for these sites based on two years worth of data.

We will continue to monitor Mildenhall carefully and any further increase in concentrations of Nitrogen Dioxide may prompt the need for a detailed assessment.

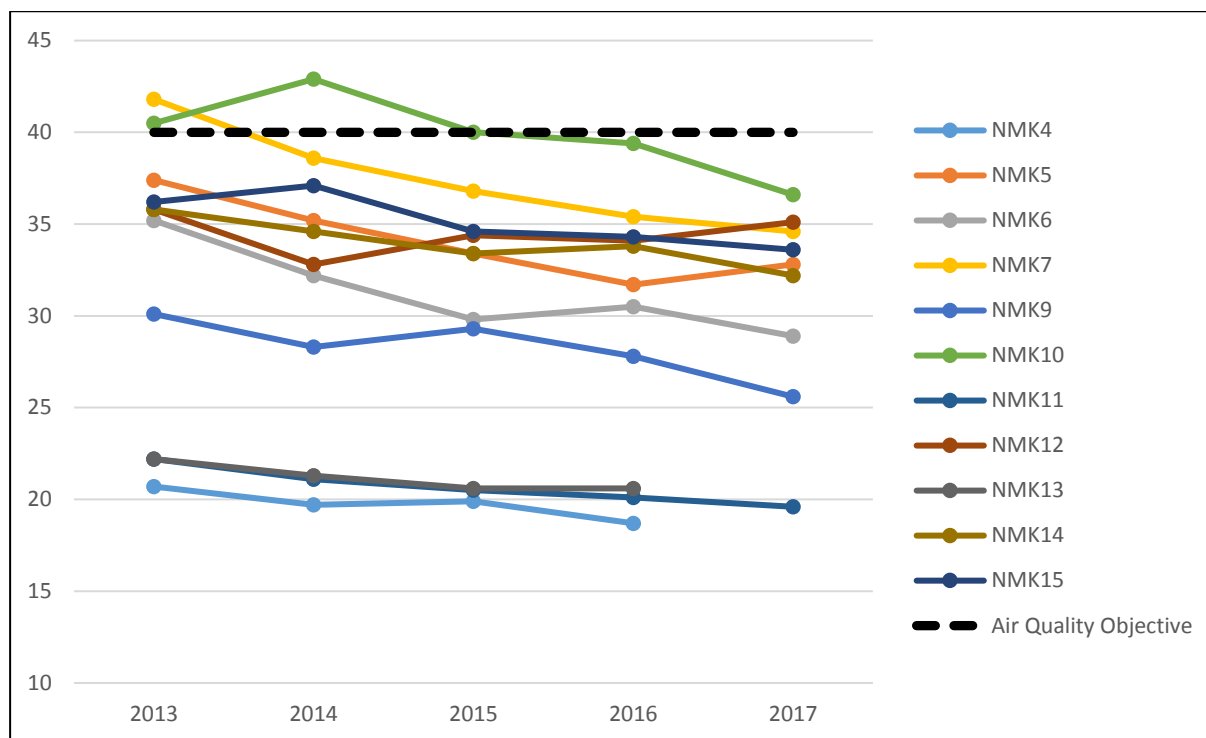
Newmarket Town Centre

Newmarket town centre has shown steady air quality improvements since the declaration of an AQMA along the High Street and Old Station Road in 2009 and the AQMA was reduced in size in April 2017 to reflect this improvement.

Following the changes to the AQMA, the High Street is no longer included within the boundaries of the AQMA. The steady reduction in pollution levels along the High Street can be seen in Figure 4 below. It should also be noted that many of these readings are taken at kerbside and would be relevant to the hourly objective, which is only considered when the annual mean is greater than $60\mu\text{g}/\text{m}^3$, whilst the annual mean of $40\mu\text{g}/\text{m}^3$ should only apply at the façade of residential properties. The recorded values have been 'distance adjusted' to the nearest façade and are provided in Appendix B for information. It should be noted that two of the monitoring locations with the lowest concentrations were relocated away from the High Street at the end of 2016.

NMK10, The Taxi Rank, has recorded a drop from $39.4\mu\text{g}/\text{m}^3$ to $36.6\mu\text{g}/\text{m}^3$ from 2016 to 2017, which represents a 9% reduction in Nitrogen Dioxide concentrations in one year. This is the greatest drop in concentrations within Forest Heath and may in part be attributable to the actions detailed in the previous sections.

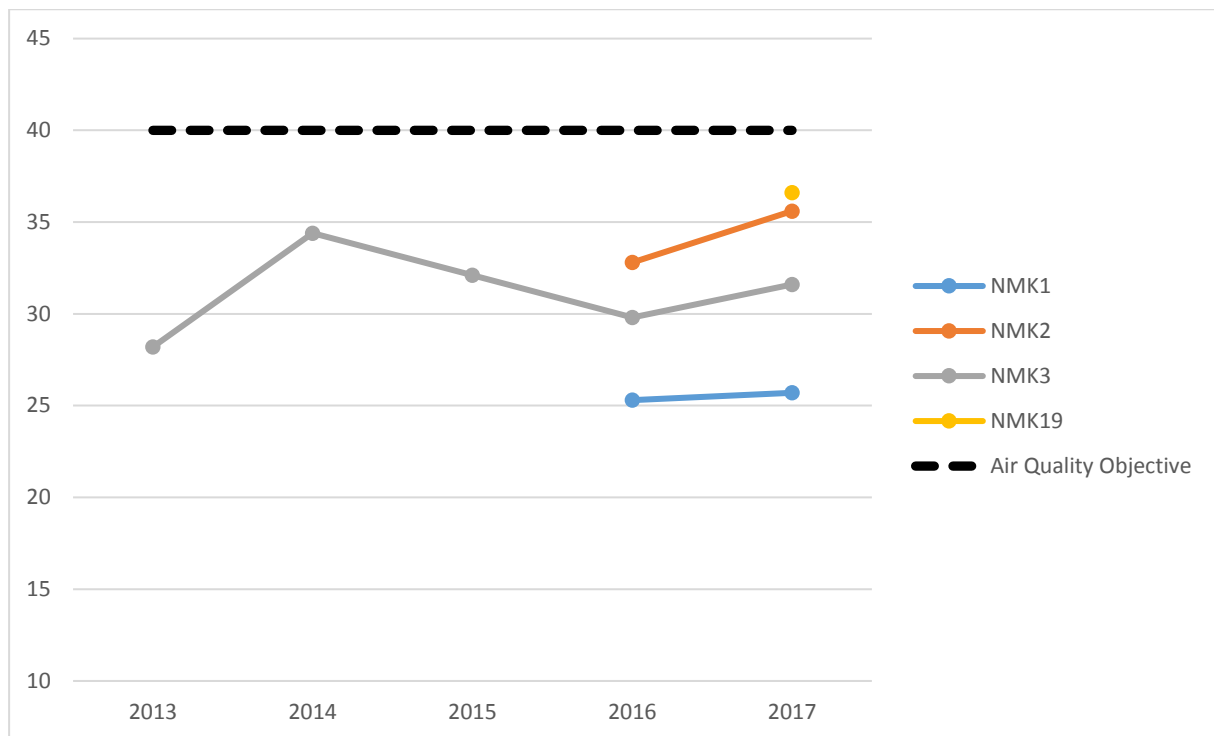
Figure 4. Trends in Concentration of Air Pollution on Newmarket High Street (not adjusted to façade of buildings)



The AQMA has been retained along Old Station Road due to insufficient confidence in the data along this road. Prior to 2016 there was only a single monitoring location on Old Station Road, but this location suffered from poor recovery rates and therefore required annualisation on several occasions. Although this location was below (compliant with) the air quality objective, it may not have been located to represent the worst case scenerio for Old Station Road. Therefore two further locations were added on Old Station Road at the beginning of 2016 and a third new location at the beginning of 2017. None of the four monitoring points within the remaining AQMA have recorded an exceedance and the need for retaining the AQMA will be reassessed once 2018 data is available and all monitoring locations have at least two years of data.

Whilst the monitoring indicates there are no concentrations of Nitrogen Dioxide above or close to the AQO, there is not considered a need to progress the action plan.

Figure 5. Trends in Concentration of Air Pollution on Newmarket Old Station Road (not adjusted to façade of buildings)



Appendix A: Monitoring Results

Table A.1 – Details of Non-Automatic Monitoring Sites

Site ID	Site Name	Site Type	X OS Grid Ref	Y OS Grid Ref	Pollutants Monitored	In AQMA?	Distance to Relevant Exposure (m) ⁽¹⁾	Distance to kerb of nearest road (m) ⁽²⁾	Tube collocated with a Continuous Analyser?	Height (m)
BRN1	Brandon – 6 Church Road	Roadside	578044	286249	NO ₂	NO	1.1	1.7	NO	2.1
BRN2	Brandon – 104 London Road	Roadside	577993	286163	NO ₂	NO	3.3	1.7	NO	2.2
BRN3	Brandon - Town Hall	Urban centre	578406	286460	NO ₂	NO	0 - hourly N/A -annual	N/A	NO	2.4
BRN4	Brandon – London Road / Stores St	Roadside	578351	286503	NO ₂	NO	2.7 ⁽³⁾	1.6	NO	2.2
BRN5	Brandon - 52 London Road	Roadside	578206	286407	NO ₂	NO	7	1.1	NO	2.2
BRN6	Brandon - London Rd/Coulson Lane	Roadside	578270	286467	NO ₂	NO	7.6	1.5	NO	2.1
BRN7	Brandon - London Rd/Church Road	Kerbside	578073	286254	NO ₂	NO	8	<1.0	NO	2.1
BRN8	Brandon - Hellesdon House, High Street	Roadside	578372	286774	NO ₂	NO	0	1.5	NO	2.3

Forest Heath District and St Edmundsbury Borough councils

Site ID	Site Name	Site Type	X OS Grid Ref	Y OS Grid Ref	Pollutants Monitored	In AQMA?	Distance to Relevant Exposure (m) ⁽¹⁾	Distance to kerb of nearest road (m) ⁽²⁾	Tube collocated with a Continuous Analyser?	Height (m)
BRN9	Brandon - Riverside Lodge, High Street	Kerbside	578372	286867	NO ₂	NO	3.3	<1.0	NO	2.4
BRN10	Brandon - 'Boots', High Street	Roadside	578395	286633	NO ₂	NO	0 - hourly 0.5 -annual	2.5	NO	2.3
BRN11	Brandon - 175 Thetford Rd	Roadside	579160	286357	NO ₂	NO	8.5	1.7	NO	2.1
LAK1	Lakenheath - Zebra Crossing	Kerbside	571378	282855	NO ₂	NO	3.5	<1.0	NO	2.1
LAK2	Lakenheath - Albert Rolph Drive	Suburban	572071	281607	NO ₂	NO	20	1	NO	2.2
MLD1	Mildenhall – 8 North Terrace	Roadside	571136	274878	NO ₂	NO	1.5	1.9	NO	2.1
MLD2	Mildenhall – 2 Queensway	Roadside	571092	274785	NO ₂	NO	0	1.8	NO	2.1
MLD3	Mildenhall - 14 Kingsway	Roadside	571326	274780	NO ₂	NO	0.5	2	NO	2.1
ICK1	Icklingham	Roadside	577266	272907	NO ₂	NO	0.3	1	NO	2.1
NMK1	Newmarket – 23 Old Station Road	Roadside	564716	263502	NO ₂	YES	0	2	NO	2.2
NMK2	Newmarket – 36 Old Station Road	kerbside	564689	263500	NO ₂	YES	2.2	0.3	NO	2.2

Forest Heath District and St Edmundsbury Borough councils

Site ID	Site Name	Site Type	X OS Grid Ref	Y OS Grid Ref	Pollutants Monitored	In AQMA?	Distance to Relevant Exposure (m) ⁽¹⁾	Distance to kerb of nearest road (m) ⁽²⁾	Tube collocated with a Continuous Analyser?	Height (m)
NMK3	Newmarket - Old Station Rd / Rous Road	Roadside	564707	263493	NO ₂	YES	2	1.7	NO	2.2
NMK4 ⁽⁶⁾	Newmarket - Sun Lane	Urban Centre	564347	263340	NO ₂	NO	0 – hourly 12 - annual	10	NO	2.4
NMK5	Newmarket - 'Café Nero' crossing	Kerbside	564337	263343	NO ₂	NO	0 – hourly N/A -annual	<1.0	NO	2.4
NMK6	Newmarket - 'KFC' downpipe	Roadside	564307	263338	NO ₂	NO	0 – hourly 0 - annual	6.5	NO	2.3
NMK7	Newmarket - 'White Hart' crossing	Kerbside	564233	263274	NO ₂	NO	0 – hourly 5.9 - annual	<1.0	NO	2.4
NMK8	Newmarket - Park area	Urban Background	564138	263301	NO ₂	NO	0 – hourly N/A - annual	N/A	NO	2.5
NMK9	Newmarket - Blackbear lane/High St	Kerbside	564043	263159	NO ₂	NO	3	<1.0	NO	2.2
NMK10	Newmarket - Taxi rank	Roadside ⁽⁴⁾	564362	263381	NO ₂	NO	0 – hourly N/A -annual	<1.0	NO	2.5
NMK11	Newmarket - Market St 'EE'	Urban Centre	564380	263407	NO ₂	NO	0 – hourly N/A - annual	11	NO	2
NMK12	Newmarket - Clock tower crossing	Roadside	564550	263544	NO ₂	NO	0 – hourly 0.3 - annual	2.5	NO	2.4

Forest Heath District and St Edmundsbury Borough councils

Site ID	Site Name	Site Type	X OS Grid Ref	Y OS Grid Ref	Pollutants Monitored	In AQMA?	Distance to Relevant Exposure (m) ⁽¹⁾	Distance to kerb of nearest road (m) ⁽²⁾	Tube collocated with a Continuous Analyser?	Height (m)
NMK13 ⁽⁶⁾	Newmarket - 'Cancer Research' downpipe	Urban Centre	564516	263474	NO ₂	NO	0 – hourly N/A - annual	13	NO	2.4
NMK14	Newmarket - 'Rutland Arms' crossing	Kerbside	564480	263464	NO ₂	NO	0 – hourly N/A - annual	<1.0	NO	2.4
NMK15	Newmarket - 'Savers' lamppost	Roadside ⁽⁴⁾	564383	263381	NO ₂	NO	0 – hourly 5.5 -annual	2.5	NO	2.3
NMK16	Newmarket - Station Approach	Kerbside	564375	262849	NO ₂	NO	N/A	<1.0	NO	2.4
NMK17	Newmarket – Exning Road/Depot Road	Roadside	563397	264498	NO ₂	NO	6.1	1.8	NO	2.1
NMK18	Newmarket - Nimbus Way	Other (A14 Back-ground)	563205	265853	NO ₂	NO	16	<1.0 (Nimbus Way)	NO	2.3
NMK19	Newmarket - Old Station Road, Nancy's Tearoom	Kerbside	564626	263525	NO ₂	YES	1.9	0.5	NO	2.1
BSE1	2 Sicklesmere Road	Roadside	586253	263147	NO ₂	YES	0	1.7	NO	2.1
BSE2	14 Sicklesmere Road	Roadside	586320	263053	NO ₂	NO	0	4	NO	2

Forest Heath District and St Edmundsbury Borough councils

Site ID	Site Name	Site Type	X OS Grid Ref	Y OS Grid Ref	Pollutants Monitored	In AQMA?	Distance to Relevant Exposure (m) ⁽¹⁾	Distance to kerb of nearest road (m) ⁽²⁾	Tube collocated with a Continuous Analyser?	Height (m)
BSE3	Cullum Road roundabout	Roadside	585236	263746	NO ₂	NO	0	3.4	NO	2
BSE4 ⁽⁶⁾	Vinery Road	Roadside	584776	263440	NO ₂	NO	1.5	2	NO	2.1
BSE5	Horringer Road lights	Roadside	584703	263483	NO ₂	NO	2	1.5	NO	2.2
BSE6	Kings Road roundabout	Roadside	584905	264171	NO ₂	NO	2.4	2.4	NO	2.1
BSE7	Northgate Lodge Roundabout	Roadside	585446	264956	NO ₂	NO	0 ⁽³⁾	1.8	NO	2
BSE8	Fornham Road (Northgate roundabout)	Roadside	585461	265050	NO ₂	NO	6	1.5	NO	2
BSE9	Fornham Road (Tollgate)	Roadside	585085	265924	NO ₂	NO	2.8	1.5	NO	2.2
BSE10	Samson Close	Suburban	584498	266084	NO ₂	NO	9.5	1.4	NO	2.2
BSE11	Eastgate Street (Vinefields junction)	Roadside	585940	264618	NO ₂	NO	0	2.7	NO	2.1
BSE12	8 Mustow Street	Roadside	585728	264371	NO ₂	NO	1.8	2.6	NO	2.2
BSE14	19F Mustow Street	Roadside	585624	264334	NO ₂	NO	0.2	2.3	NO	2.2
BSE15	⁷ Sicklesmere Road	Roadside	586273	263135	NO ₂	YES	0	1.2	NO	1.8

Forest Heath District and St Edmundsbury Borough councils

Site ID	Site Name	Site Type	X OS Grid Ref	Y OS Grid Ref	Pollutants Monitored	In AQMA?	Distance to Relevant Exposure (m) ⁽¹⁾	Distance to kerb of nearest road (m) ⁽²⁾	Tube collocated with a Continuous Analyser?	Height (m)
BSE16	Northgate Lodge Roundabout	Roadside	585424	264977	NO ₂	NO	0.4	1.2	NO	1.9
BSE17	Tayfen Road	Roadside	585264	264921	NO ₂	NO	N/A	2.1	NO	1.9
BSE18	Southgate Street	Roadside	586126	263328	NO ₂	NO	0.2	1.6	NO	1.9
GB2	Downing Drive	Suburban	588917	267370	NO ₂	NO	16	1.5	NO	1.9
GB3	The Forge Bungalows ⁽⁵⁾	Roadside	589163	267013	NO ₂	NO	4	1.4	NO	2.2
GB4	Post Office ⁽⁵⁾	Roadside	589130	266969	NO ₂	YES	0	1.4	NO	2.2
GB5	Church Road junction ⁽⁵⁾	Roadside	588993	266838	NO ₂	NO	22	1.3	NO	2.2
HH1	Shetland Road	Suburban	568609	245575	NO ₂	NO	8.7	1.7	NO	2.1
HH2	Wratting Road	Roadside	567270	245981	NO ₂	NO	3	1.8	NO	2.1
HH3	29 Withersfield Road	Roadside	566891	245892	NO ₂	NO	2.4	1.7	NO	2.2
HH5	22 Withersfield Road	Roadside	566941	245850	NO ₂	NO	0.3	1.4	NO	2.1

Notes:

(1) 0m if the monitoring site is at a location of exposure (e.g. installed on/adjacent to the façade of a residential property).

(2) N/A if not applicable.

(3) Receptor not adjacent to tube, but distances correct if monitoring location transposed along road to receptor location

(4) Where tubes are located adjacent to indented parking bays along Newmarket High Street, the distance to the kerb has been taken as the distance from the edge of the carriageway with flowing traffic rather than from the physical kerb.

(5) Locations are triplicates

(6) Locations no longer monitored, but information provided as historic monitoring data included.

Table A.2 – Annual Mean NO₂ Monitoring Results

Site ID	Site Type	Monitoring Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2017 (%) ⁽²⁾	NO ₂ Annual Mean Concentration (µg/m ³) ⁽³⁾				
					2013	2014	2015	2016	2017
BRN1	Roadside	Diffusion Tube	100	100	-	-	-	21.3	20.9
BRN2	Roadside	Diffusion Tube	100	100	-	-	-	33.2	31.5
BRN3	Urban centre	Diffusion Tube	100	100	15.3	14.5	14.1	13.5	13.6
BRN4	Roadside	Diffusion Tube	66	66	37	36.9	33	30.5	30.9
BRN5	Roadside	Diffusion Tube	83	83	40.4	37.8	39.4	37.7	37.4
BRN6	Roadside	Diffusion Tube	100	100	33.9	28.4	27.4	26.4	25.5
BRN7	Kerbside	Diffusion Tube	92	92	34.3	35.6	33.5	32	32
BRN8	Roadside	Diffusion Tube	75	75	28.6	27.4	26.3	23.4	24
BRN9	Kerbside	Diffusion Tube	50	50	36.6	32.5	27.9	29.6	31
BRN10	Roadside	Diffusion Tube	100	100	38.6	38.5	35.4	33.3	30.5
BRN11	Roadside	Diffusion Tube	83	83	18.9	19	17.3	17.6	18.4
LAK1	Kerbside	Diffusion Tube	100	100	21.4	19.2	18.7	20	19
LAK2	Suburban	Diffusion Tube	100	100	12.2	14.3	12.7	12	12
MLD1	Roadside	Diffusion Tube	92	92	-	-	-	23.3	23.7

Forest Heath District and St Edmundsbury Borough councils

Site ID	Site Type	Monitoring Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2017 (%) ⁽²⁾	NO ₂ Annual Mean Concentration (µg/m ³) ⁽³⁾				
					2013	2014	2015	2016	2017
MLD2	Roadside	Diffusion Tube	100	100	-	-	-	26.8	28.6
MLD3	Roadside	Diffusion Tube	100	100	35.6	33.5	35.5	34.3	36.4
ICK1	Roadside	Diffusion Tube	100	100	-	-	-	20.7	23.2
NMK1	Roadside	Diffusion Tube	100	100	-	-	-	25.3	25.7
NMK2	Kerbside	Diffusion Tube	75	75	-	-	-	32.8	35.6
NMK3	Roadside	Diffusion Tube	92	92	28.2	34.4	32.1	29.8	31.6
NMK4	Urban Centre	Diffusion Tube	0	0	20.7	19.7	19.9	18.7	- ⁽⁴⁾
NMK5	Kerbside	Diffusion Tube	100	100	37.4	35.2	33.4	31.7	32.8
NMK6	Roadside	Diffusion Tube	100	100	35.2	32.2	29.8	30.5	28.9
NMK7	Kerbside	Diffusion Tube	100	100	41.8	38.6	36.8	35.4	34.6
NMK8	Urban Background	Diffusion Tube	100	100	17	14.3	14	14.6	14.4
NMK9	Kerbside	Diffusion Tube	92	92	30.1	28.3	29.3	27.8	25.6
NMK10	Roadside	Diffusion Tube	100	100	40.5	42.9	40	39.4	36.6
NMK11	Urban Centre	Diffusion Tube	83	83	22.2	21.1	20.5	20.1	19.6
NMK12	Roadside	Diffusion Tube	83	83	35.8	32.8	34.4	34.1	35.1

Forest Heath District and St Edmundsbury Borough councils

Site ID	Site Type	Monitoring Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2017 (%) ⁽²⁾	NO ₂ Annual Mean Concentration (µg/m ³) ⁽³⁾				
					2013	2014	2015	2016	2017
NMK13	Urban Centre	Diffusion Tube	0	0	22.2	21.3	20.6	20.6	- ⁽⁴⁾
NMK14	Kerbside	Diffusion Tube	100	100	35.8	34.6	33.4	33.8	32.2
NMK15	Roadside	Diffusion Tube	92	92	36.2	37.1	34.6	34.3	33.6
NMK16	Kerbside	Diffusion Tube	92	92	15.9	13.1	13.9	12.5	13.7
NMK17	Roadside	Diffusion Tube	100	100	-	-	-	24.3	25.1
NMK18	Other (A14 Back-ground)	Diffusion Tube	100	100	33	22.7	25.4	22.2	21
NMK19	Kerbside	Diffusion Tube	100	100	-	-	-	-	36.6
BSE1	Roadside	Diffusion Tube	100	100	-	-	45.3	42.1	44.7
BSE2	Roadside	Diffusion Tube	100	100	-	-	31.2	30.0	29.5
BSE3	Roadside	Diffusion Tube	100	100	32.9	31.7	32.5	29.5	28.5
BSE4	Roadside	Diffusion Tube	0	0	-	-	25.8	23.6	- ⁽⁴⁾
BSE5	Roadside	Diffusion Tube	92	92	-	-	26.4	28.6	26.2
BSE6	Roadside	Diffusion Tube	100	100	-	-	37.5	41.5	38.7
BSE7	Roadside	Diffusion Tube	92	92	28.3	26.5	29.4	28.2	29.3
BSE8	Roadside	Diffusion Tube	92	92	-	-	29.1	30.3	29.9

Forest Heath District and St Edmundsbury Borough councils

Site ID	Site Type	Monitoring Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2017 (%) ⁽²⁾	NO ₂ Annual Mean Concentration (µg/m ³) ⁽³⁾				
					2013	2014	2015	2016	2017
BSE9	Roadside	Diffusion Tube	100	100	-	-	38.0	36.5	36.8
BSE10	Suburban	Diffusion Tube	83	83	14.6	14.1	13.4	12.9	13.5
BSE11	Roadside	Diffusion Tube	92	92	-	-	24.2	23.2	21.3
BSE12	Roadside	Diffusion Tube	83	83	-	-	24.2	23.5	22.4
BSE14	Roadside	Diffusion Tube	83	83	-	-	-	32.1	33.0
BSE15	Roadside	Diffusion Tube	100	100	-	-	-	41.5	37.6
BSE16	Roadside	Diffusion Tube	66	66	-	-	-	36.4	35.8
BSE17	Roadside	Diffusion Tube	83	83	-	-	-	33.0	35.6
BSE18	Roadside	Diffusion Tube	83	83	-	-	-	35.3	30.0
GB2	Suburban	Diffusion Tube	100	100	-	-	10.1	10.0	11.4
GB3	Roadside	Diffusion Tube	100	100	37.9	36.5	36	31.2	31.8
GB4	Roadside	Diffusion Tube	94	94	46.7	43.7	40.9	37.9	36.0
GB5	Roadside	Diffusion Tube	100	100	39.7	40.1	35.1	32.9	32.2
HH1	Suburban	Diffusion Tube	100	100	14.5	13.7	13.3	13.0	14.3
HH2	Roadside	Diffusion Tube	92	92	-	-	32.0	30.7	31.1

Forest Heath District and St Edmundsbury Borough councils

Site ID	Site Type	Monitoring Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2017 (%) ⁽²⁾	NO ₂ Annual Mean Concentration (µg/m ³) ⁽³⁾				
					2013	2014	2015	2016	2017
HH3	Roadside	Diffusion Tube	92	92	36.9	38.3	38.3	34.1	36.3
HH5	Roadside	Diffusion Tube	92	92	-	-	-	36.5	32.6

☒ Diffusion tube data has been bias corrected

☒ Annualisation has been conducted where data capture is <75%

Notes:

Exceedances of the NO₂ annual mean objective of 40µg/m³ are shown in **bold**.

NO₂ annual means exceeding 60µg/m³, indicating a potential exceedance of the NO₂ 1-hour mean objective are shown in **bold and underlined**.

(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).

(3) Means for diffusion tubes have been corrected for bias. All means have been “annualised” as per Boxes 7.9 and 7.10 in LAQM.TG16 if valid data capture for the full calendar year is less than 75%. See Appendix C for details.

(4) Sites removed at end of 2016, but data retained for information.

Appendix B: Full Monthly Diffusion Tube Results for 2017

Table B.1 – NO₂ Monthly Diffusion Tube Results - 2017

Page 53

Site ID	NO ₂ Mean Concentrations (µg/m ³)														
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Mean		
													Raw Data	Bias Adjusted (0.77) and Annualised ⁽¹⁾	Distance Corrected to Nearest Exposure ⁽²⁾
BRN1	41.1	32.3	29.8	23.9	22.1	21.8	21.1	18	26.7	27	36.6	25	27.1	20.9	19.9
BRN2	53.9	47.5	43.5	41.5	33.1	35.2	32.6	29.9	40.9	40.0	47.2	45.4	40.9	31.5	26.8
BRN3	20.5	20.5	18	16.3	13.2	12.5	11	13	16.5	21.2	27.1	21.8	17.6	13.6	13.6
BRN4	50.5	36.6	37	-	36.6	29.7	33.6	35.2	39.1	-	-	-	37.3	30.9	26.7
BRN5	53.6	52.6	45.3	46.8	34.7	42.6	-	42	49.5	-	64.6	54.1	48.6	37.4	27.0
BRN6	48.4	34.4	34.6	29.1	25.1	25.8	24.5	26.3	34.1	36.2	39.2	39.8	33.1	25.5	20.2
BRN7	61.6	49.1	43.6	39.1	-	39.8	35.2	35	42.9	40.1	38.3	31.8	41.5	32.0	23.1
BRN8	44.4	36.8	-	-	28.1	11	-	27.9	31.8	31.4	31.6	38.1	31.2	24.0	24.0
BRN9	51.9	-	30.6	34.8	-	29.6	35.2	32.7	-	-	-	-	35.8	31.0	25.4
BRN10	52.3	51.1	40.4	36.1	42.5	37.5	35.1	31.3	39.9	32.1	44	32.4	39.6	30.5	29.7
BRN11	40	28.7	23.5	17.8	-	-	14.6	15.8	19.7	21.2	27.8	30.5	24.0	18.4	15.8
LAK1	45.3	27.5	25.4	23.4	22.2	15.2	17.6	19.1	25.5	21.6	27.3	26.7	24.7	19.0	16.9
LAK2	27.7	18.5	16.5	12.4	11.2	8.5	9.4	9.8	14.3	16.6	22	20.7	15.6	12.0	12.0
MLD1	48.3	34.6	29.1	-	25.2	23.7	22.8	21.4	30.8	29.5	38.3	34.9	30.8	23.7	22.1
MLD2	49.1	44.7	42.5	30.6	34.9	32	27.8	30	37.4	36.3	40.5	40.2	37.2	28.6	28.6
MLD3	74.2	50.5	55.1	39.9	42.8	42.9	36.6	40	46.2	44.6	53.1	41.1	47.3	36.4	35.1

Forest Heath District and St Edmundsbury Borough councils

Site ID	NO ₂ Mean Concentrations (µg/m ³)														
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Mean		
													Raw Data	Bias Adjusted (0.77) and Annualised ⁽¹⁾	Distance Corrected to Nearest Exposure ⁽²⁾
ICK1	47	31.4	27.1	25.3	22	25.2	20.3	23.8	30.7	32.4	42.2	34.5	30.2	23.2	22.6
NMK1	48.6	34.8	33.7	33.3	30.6	23.7	27.6	25.8	30.3	32.3	47.5	32.7	33.4	25.7	25.7
NMK2	64	47.2	45.8	56.3	35.5	39.6	-	39	-	43.7	-	45.4	46.3	35.6	27.5
NMK3	61.5	42.6	41.6	37.8	34.1	38.2	34.2	35.1	42.1	40.3	-	44.5	41.1	31.6	28.2
NMK5	58.2	50.5	43.7	37.6	38.7	34.1	33.4	33.7	41.4	45.7	56.3	38	42.6	32.8	24.0
NMK6	51.1	38.7	37.1	38	32.9	32	29.5	32	32.1	37.6	54.9	33.8	37.5	28.9	28.9
NMK7	51.8	48.1	46.7	45	35.6	41.3	32.2	40.4	43.2	42.1	64.8	47.7	44.9	34.6	25.8
NMK8	33.3	24.5	21.1	16.6	14	11.7	11.9	11.6	17.6	19.1	27.6	15.5	18.7	14.4	14.4
NMK9	48.2	35.9	32.2	28.4	-	25	26.5	27.6	30	32.6	46.7	32.6	33.2	25.6	21.8
NMK10	63.1	47.5	46.6	56.1	34.3	41.3	38.7	39.6	41.1	49.6	71.3	40.9	47.5	36.6	31.3
NMK11	42.5	27.6	27.3	19.9	-	15	18.6	16.5	-	27.5	33.4	25.8	25.4	19.6	19.6
NMK12	63	47.6	49.2	45.4	39.2	-	38.3	38.9	37.3	-	43.6	53.5	45.6	35.1	34.5
NMK14	59.1	44.6	42.9	39.6	34.2	30.3	33.9	34.1	42	45.7	56.2	39.3	41.8	32.2	25.1
NMK15	59.7	49.7	45.7	34.3	36.1	-	33.1	31.3	41	44.7	57.7	46	43.6	33.6	27.4
NMK16	33.6	23.1	16.5	12.4	12.7	9.4	11.6	-	15.8	16.7	24.3	19.6	17.8	13.7	
NMK17	49	37.9	34.5	28.2	24.2	26.1	25.7	23	28.3	34.5	47.4	32.7	32.6	25.1	20.7
NMK18	39.6	27.9	31.1	30.4	23.9	18.5	19.8	21.6	25	22.3	38.1	29.3	27.3	21.0	15.9
NMK19	65.1	51.2	47.5	43.6	41.5	42	40.3	41.6	49.9	44	59.7	44.3	47.6	36.6	29.8
BSE1	76.7	59.9	60.5	62.1	47	50.3	48.2	52.5	57.3	54.1	72.8	56	58.1	44.7	44.7
BSE2	51.8	44.4	36	36.9	27.8	32.5	30.8	32	38.7	39.6	49.4	39.8	38.3	29.5	29.5

Forest Heath District and St Edmundsbury Borough councils

Site ID	NO ₂ Mean Concentrations (µg/m ³)														
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Mean		
													Raw Data	Bias Adjusted (0.77) and Annualised ⁽¹⁾	Distance Corrected to Nearest Exposure ⁽²⁾
BSE3	49.7	45.7	47.1	41.5	31.4	32.3	25.3	26.6	27.2	33.8	42.2	41	37.0	28.5	28.5
BSE5	42.8	40.7	37.8	39	27.9	26.1	21.9	24.3	27.7	-	48.8	36.8	34.0	26.2	23.8
BSE6	69.5	57.9	55.6	53.9	43	38.9	32.4	42.8	50.8	49.7	59.7	48.8	50.3	38.7	34.4
BSE7	51.9	39.2	44.2	38.7	29.9	34.5	-	31.4	36.2	33.5	41.6	37.4	38.0	29.3	29.3
BSE8	54.8	-	44.8	38.6	35.4	34.7	30.3	31.1	35.9	37.6	46.2	38.2	38.9	29.9	24.1
BSE9	55.6	56.6	56	44.5	49.7	43.1	33.5	42.9	46.7	43.3	54.6	47.3	47.8	36.8	31.4
BSE10	26.4	22.3	18.6	14.8	-	-	9.3	9.8	14.4	17	24	19.1	17.6	13.5	13.5
BSE11	-	37.7	36.1	26.1	26.4	22.8	18.4	22.2	27.1	26.4	33.7	28	27.7	21.3	21.3
BSE12	28.8	35.3	24.1	33.4	29	27.3	20.6	-	30.8	27.6	-	33.4	29.0	22.4	21.2
BSE14	59.6	52.9	49.5	40.6	-	41.6	32.6	36.1	44	36	-	35.2	42.8	33.0	32.6
BSE15	70.3	54.5	54.7	47.5	44.5	44.5	27.7	39.4	46.3	48.5	60.8	47.4	48.8	37.6	37.6
BSE16	71.1	58.1	57.6	-	-	43	37.9	35.4	-	-	48.3	44.1	49.4	35.8	34.5
BSE17	59.7	51.4	55.8	-	43.6	42.8	-	40.6	43.9	39.5	47.5	38.1	46.3	35.6	
BSE18	-	48	46.4	40.1	33.4	39	35.4	37	37.4	33.9	-	39.1	39.0	30.0	29.6
GB2	24.2	16.7	15.7	11.1	14.9	8.9	7.4	10.6	13.1	15.5	21.1	17.9	14.8	11.4	11.4
GB3a	52.9	42.4	42.5	38.8	30.8	36.5	31.5	32.9	38.2	45.3	51.6	46.8	40.9	31.8	25.8
GB3b	44.8	45.6	45.6	42.1	33	36.3	31.1	33.6	40.3	49.2	51.1	50.1	41.9		
GB3c	52.6	44.6	41.5	36.9	32.2	37	30.8	30.8	40.8	46.2	54.8	46.6	41.2		

Forest Heath District and St Edmundsbury Borough councils

Page 56

Site ID	NO ₂ Mean Concentrations (µg/m³)														
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Mean		
													Raw Data	Bias Adjusted (0.77) and Annualised ⁽¹⁾	Distance Corrected to Nearest Exposure ⁽²⁾
GB4a	66.7	49.9	48.3	49.5	42.9	38.1	38.2	35.7	45.9	49.6	59.9	44.7	47.5	36.0	36.0
GB4b	48.6	50.7	53.8	48	42.7	45.2	34.6	41.7	42.5	45.8	59.6	53	47.2		
GB4c	59.1	51.5	45.8	49.8	41	44.8	39.6	37.3	45	-	-	44.2	45.8		
GB5a	55.5	46.5	38.9	39.8	45.1	40.5	34.7	35.6	42.9	43.6	47.7	39.8	42.6	32.2	19.4
GB5b	53.2	39.8	43.7	38.6	41.8	40.8	34.7	36.4	41.8	43.3	51.5	34.7	41.7		
GB5c	60.4	47.4	40.4	38.4	42.1	39.9	34.9	29.6	40.8	43.5	41	37.4	41.3		
HH1	32.8	22.7	21.2	13	13.2	11.3	10.1	10.2	14.7	20	26.9	26.5	18.6	14.3	14.3
HH2	58.7	49.7	45	32.4	-	36.8	30.5	31.2	38.9	40.1	44.1	36.8	40.4	31.1	27.3
HH3	71	-	52.8	45.8	39.2	37.1	36.2	35.3	47	44.5	57.2	52	47.1	36.3	31.9
HH5	69.9	46.7	44.5	38.7	41.8	34.5	27.9	34.1	-	37.6	50.3	39.6	42.3	32.6	31.8

☒ National bias adjustment factor used

☒ Annualisation has been conducted where data capture is <75%

☒ Where applicable, data has been distance corrected for relevant exposure

Notes:

Exceedances of the NO₂ annual mean objective of 40µg/m³ are shown in **bold**.

NO₂ annual means exceeding 60µg/m³, indicating a potential exceedance of the NO₂ 1-hour mean objective are shown in **bold and underlined**.

(1) See Appendix C for details on bias adjustment and annualisation.

(2) Distance corrected to nearest relevant public exposure.

Appendix C: Supporting Technical Information / Air Quality Monitoring Data QA/QC

Bias Adjustment

Bias adjustment was calculated from the national Bias adjustment spreadsheet as published by Defra. A local Bias adjustment factor was not considered as there was no local continuous monitoring. A screenshot of the bias adjustment spreadsheet is provided below for information.

National Diffusion Tube Bias Adjustment Factor Spreadsheet						Spreadsheet Version Number: 03/18				
Follow the steps below in the correct order to show the results of relevant co-location studies						This spreadsheet will be updated at the end of June 2018				
Data only apply to tubes exposed monthly and are not suitable for correcting individual short-term monitoring periods						Whenever presenting adjusted data, you should state the adjustment factor used and the version of the spreadsheet				
This spreadsheet will be updated every few months; the factors may therefore be subject to change. This should not discourage their immediate use.						LAQM Helpdesk Website				
The LAQM Helpdesk is operated on behalf of Defra and the Devolved Administrations by Bureau Veritas, in conjunction with contract partners AECOM and the National Physical Laboratory.						Spreadsheet maintained by the National Physical Laboratory. Original compiled by Air Quality Consultants Ltd.				
Step 1:		Step 2:		Step 3:		Step 4:				
Select the Laboratory that Analyses Your Tubes from the Drop-Down List		Select a Preparation Method from the Drop-Down List		Select a Year from the Drop-Down List		Where there is only one study for a chosen combination, you should use the adjustment factor shown with caution. Where there is more than one study, use the overall factor ² shown in blue at the foot of the final column.				
If a laboratory is not shown, we have no data for this laboratory.		If a preparation method is not shown, we have no data for this method at this laboratory.		If a year is not shown, we have no data.		If you have your own co-location study then see footnote ³ . If uncertain what to do then contact the Local Air Quality Management Helpdesk at LAQMHelpdesk@uk.bureauveritas.com or 0800 0327953				
Analysed By ¹	Method ²	Year ³	Site Type	Local Authority	Length of Study (months)	Diffusion Tube Mean Conc. (Dm) (µg/m ³)	Automatic Monitor Mean Conc. (Cm) (µg/m ³)	Bias (B)	Tube Precision ⁴	Bias Adjustment Factor (A) (Cm/Dm)
ESG Didcot	50% TEA in acetone	2017	R	Suffolk Coastal DC	12	45	37	21.7%	G	0.82
ESG Didcot	50% TEA in acetone	2017	R	Dumfries and Galloway Council	12	36	29	23.3%	G	0.81
ESG Didcot	50% TEA in acetone	2017	KS	Manglebone Road Intercomparison	12	106	79	34.3%	G	0.74
ESG Didcot	50% TEA in acetone	2017	R	Vale of White Horse District Council	11	31	25	26.0%	G	0.79
ESG Didcot	50% TEA in acetone	2017	UB	Cardiff City Council	10	29	21	35.1%	G	0.74
ESG Didcot	50% TEA in acetone	2017	R	Cambridge City Council	12	45	33	37.7%	G	0.73
ESG Didcot	50% TEA in acetone	2017	R	Wrexham County Borough Council	12	20	17	14.5%	G	0.87
ESG Didcot	50% TEA in acetone	2017	UI	North Lincolnshire Council	12	22	16	40.7%	G	0.71
ESG Didcot	50% TEA in acetone	2017	KS	Caerphilly CBC	12	37	32	15.8%	G	0.86
ESG Didcot	50% TEA in acetone	2017	R	Caerphilly CBC	11	44	29	51.2%	G	0.66
ESG Didcot	50% TEA in acetone	2017	UB	City of York Council	12	23	15	53.4%	G	0.65
ESG Didcot	50% TEA in acetone	2017	R	City of York Council	10	37	28	30.8%	G	0.76
ESG Didcot	50% TEA in acetone	2017	R	City of York Council	11	32	23	41.0%	G	0.71
ESG Didcot	50% TEA in acetone	2017	R	City of York Council	12	40	25	58.6%	G	0.63
ESG Didcot	50% TEA in acetone	2017	R	Hambleton District Council	10	21	20	4.0%	G	0.96
ESG Didcot	50% TEA in acetone	2017	R	Horsham District Council	11	35	29	18.1%	G	0.85
ESG Didcot	50% TEA in acetone	2017	R	Horsham District Council	12	31	26	21.3%	G	0.82
ESG Didcot	50% TEA in acetone	2017	R	Horsham District Council	11	33	23	41.1%	G	0.71
ESG Didcot	50% TEA in acetone	2017	UC	Leeds City Council 1	12	41	32	28.5%	G	0.78
ESG Didcot	50% TEA in acetone	2017	R	Leeds City Council 10	11	48	38	25.1%	S	0.80
ESG Didcot	50% TEA in acetone	2017	R	Leeds City Council 2	12	47	35	34.4%	S	0.74
ESG Didcot	50% TEA in acetone	2017	R	Leeds City Council 4	11	56	43	29.1%	S	0.77
ESG Didcot	50% TEA in acetone	2017	R	Leeds City Council 7	11	38	27	39.8%	S	0.72
ESG Didcot	50% TEA in acetone	2017	R	Slough Borough Council	12	45	35	26.4%	G	0.79
ESG Didcot	50% TEA in acetone	2017	UB	Slough Borough Council	12	32	25	28.6%	G	0.78
ESG Didcot	50% TEA in acetone	2017	UB	Slough Borough Council	11	39	33	19.2%	G	0.84
ESG Didcot	50% TEA in acetone	2017	R	Tunbridge Wells	12	56	40	38.2%	G	0.72
ESG Didcot	50% TEA in acetone	2017		Overall Factor ² (27 studies)					Use	0.77

Annualisation

Three sites were annualised due to data collection being lower than 75%. These were Northgate Lodge in Bury St Edmunds (BSE16) and London Road/Stores Street and Riverside Lodge, both Brandon (BRN4 and BRN9).

Given no continuous monitoring is located in West Suffolk, three background diffusion tube sites with 100% data collection were selected to act as a comparison. These sites are Downing Drive in Great Barton (GB2), Shetland Road in Haverhill (HH1) and Albert Rolph Drive in Lakenheath (LAK2).

Forest Heath District and St Edmundsbury Borough councils

The calculations for working out the annualisation factor are given below. The period mean is the mean for the background sites in the months where data was collected for the annualised site.

Northgate Lodge (BSE16):

Background Site	Annual Mean	Period Mean	Ratio
GB2	14.8	15.3	0.96
HH1	18.6	20.2	0.92
LAK2	15.6	16.6	0.94
Average Ratio (annualisation factor applied)			0.94

Brandon, London Road/Stores Street (BRN4):

Background Site	Annual Mean	Period Mean	Ratio
GB2	14.8	13.9	1.06
HH1	18.6	17.0	1.09
LAK2	15.6	14.5	1.08
Average Ratio (annualisation factor applied)			1.076

Brandon, Riverside Lodge (BRN9):

Background Site	Annual Mean	Period Mean	Ratio
GB2	14.8	13.0	1.14
HH1	18.6	16.4	1.13
LAK2	15.6	14.1	1.11
Average Ratio (annualisation factor applied)			1.126

Distance Correction

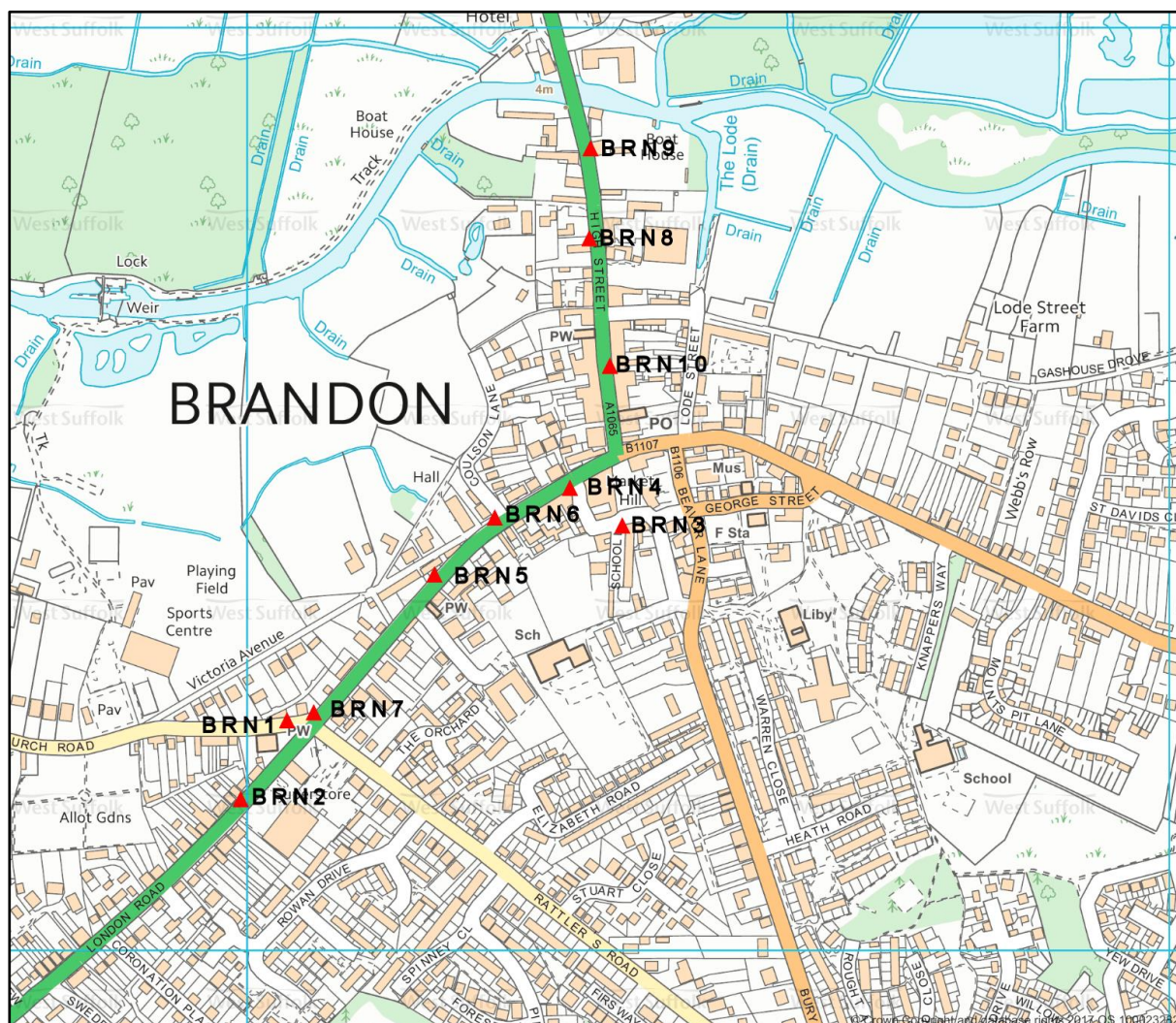
Distance correction was carried out on all sites where the monitoring was not carried out at a relevant receptor location. For Newmarket High Street, the hourly objective applies at the monitored sites, but the sites were adjusted to the façade of the nearest property so that the annual objective could also be assessed.

For all calculations, the Defra NO₂ fall off with distance tool (March 2018) was used. For the mean annual background concentration the following sites were used:

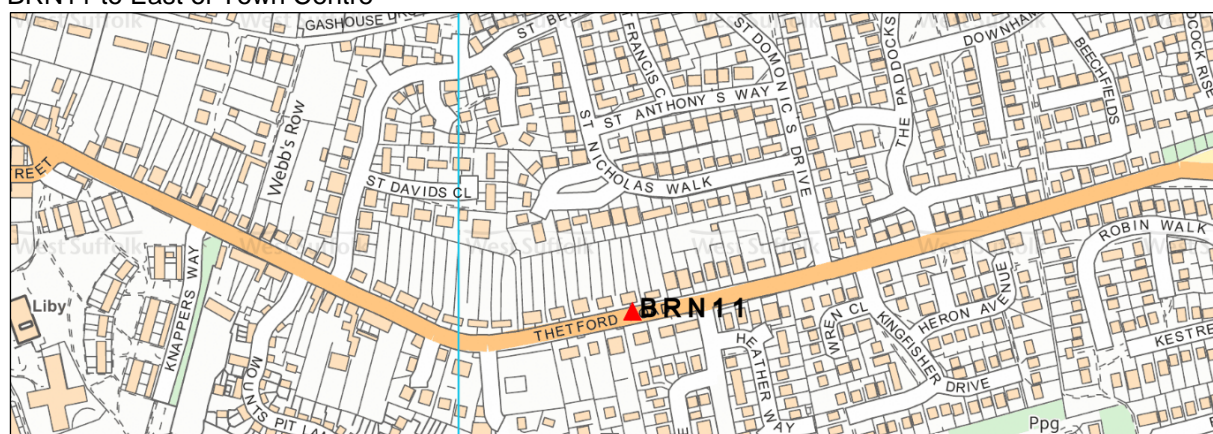
- Brandon, Lakenheath, Icklingham and Mildenhall – LAK2
- Newmarket – NMK8
- Bury St Edmunds – BSE10
- Great Barton – GB2
- Haverhill – HH1

Appendix D: Map(s) of Monitoring Locations and AQMAs

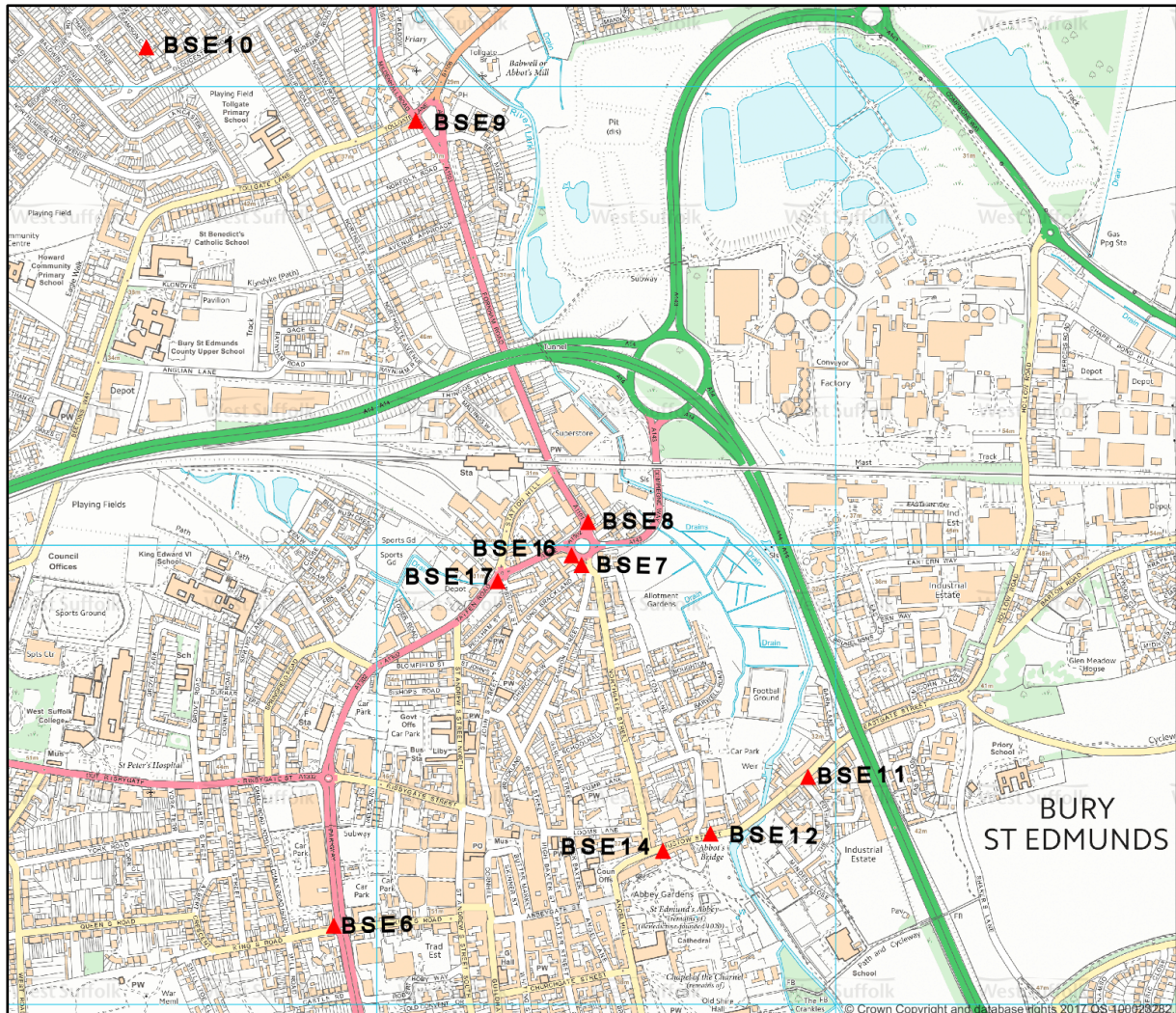
Brandon Diffusion Tube Locations



BRN11 to East of Town Centre

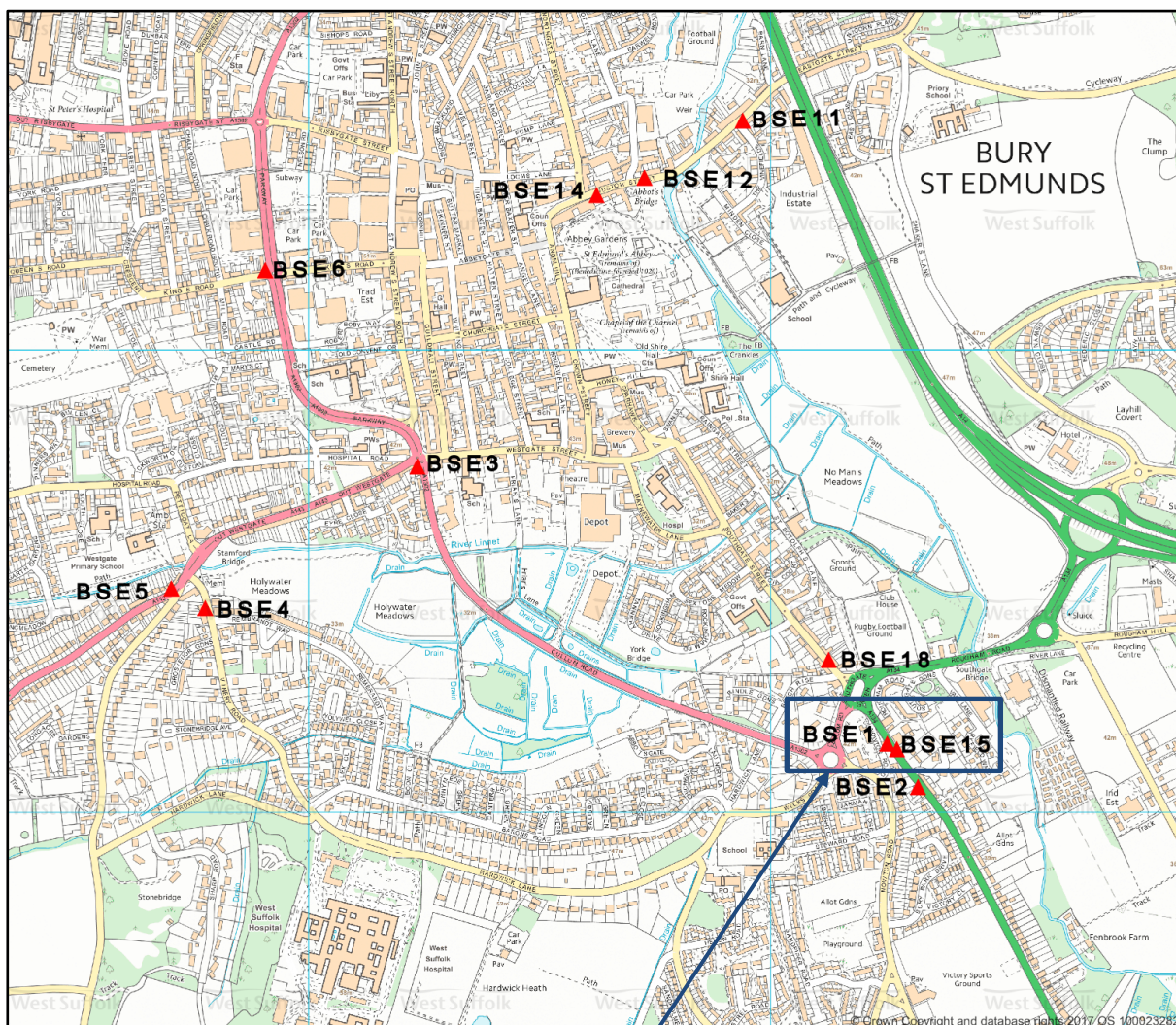


Bury St Edmunds (north) Diffusion Tube Locations



Forest Heath District and St Edmundsbury Borough councils

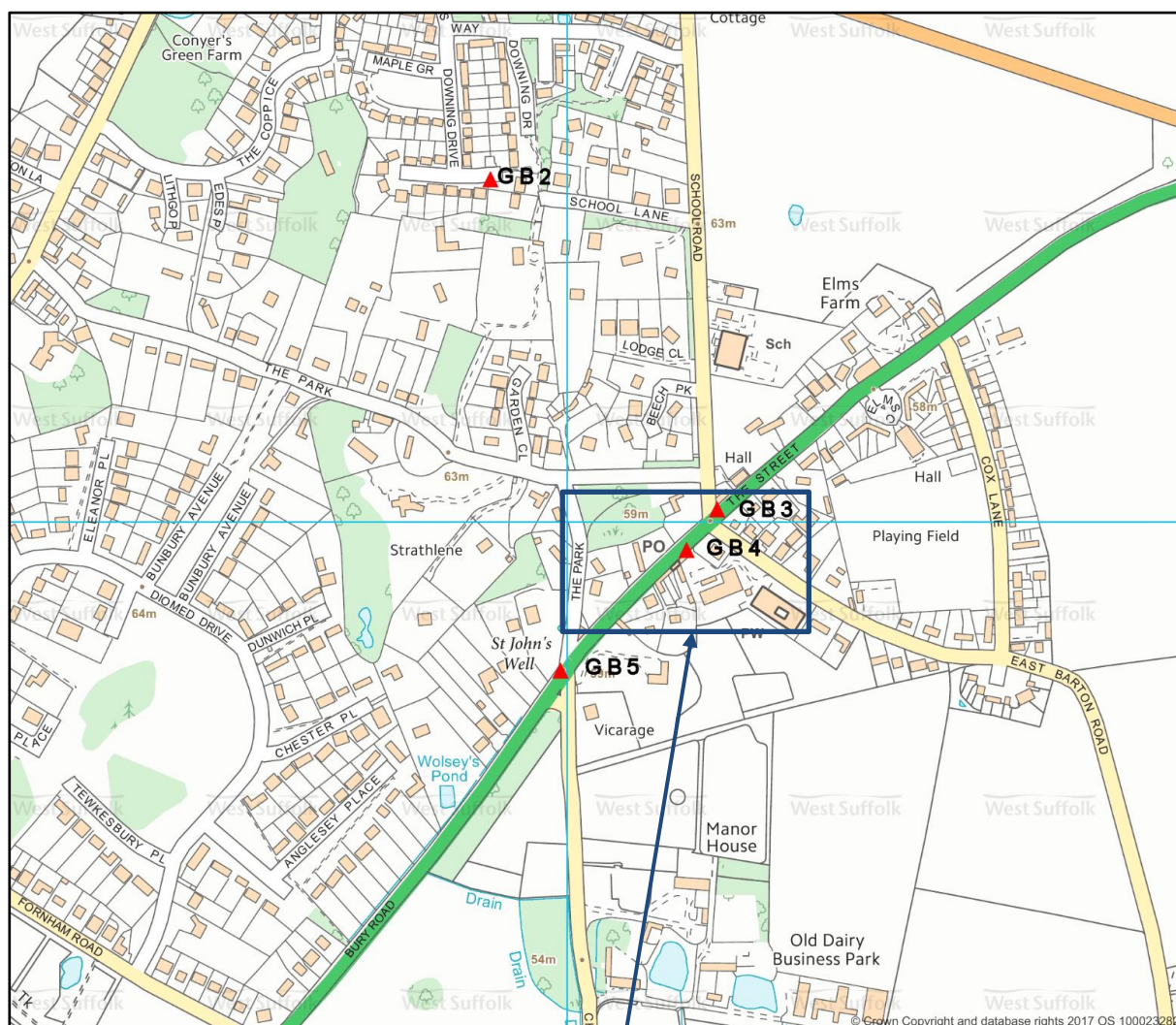
Bury St Edmunds (south) Diffusion Tube Locations



Sicklesmere Road AQMA Location



Great Barton Diffusion Tube Locations



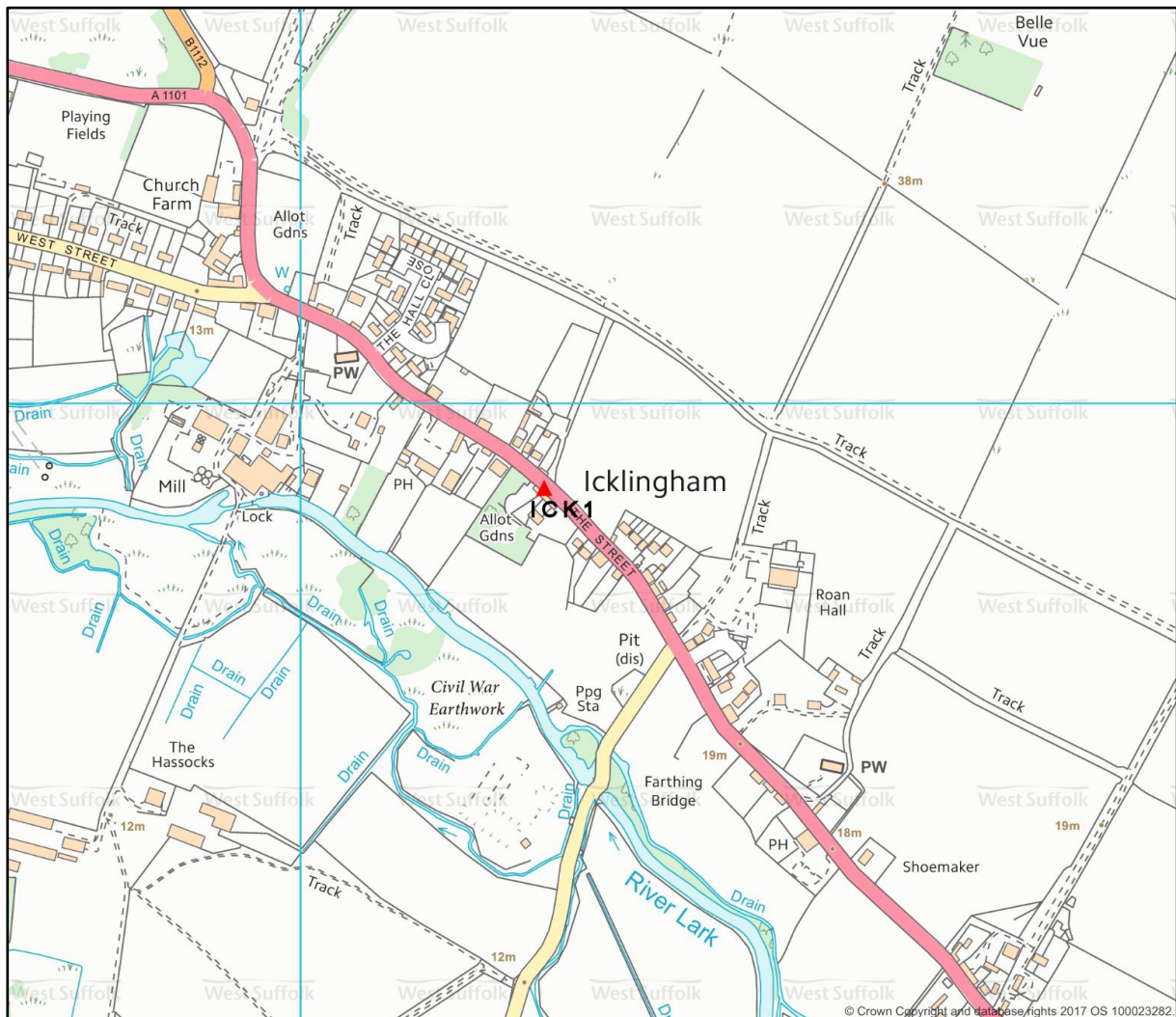
Great Barton AQMA Location



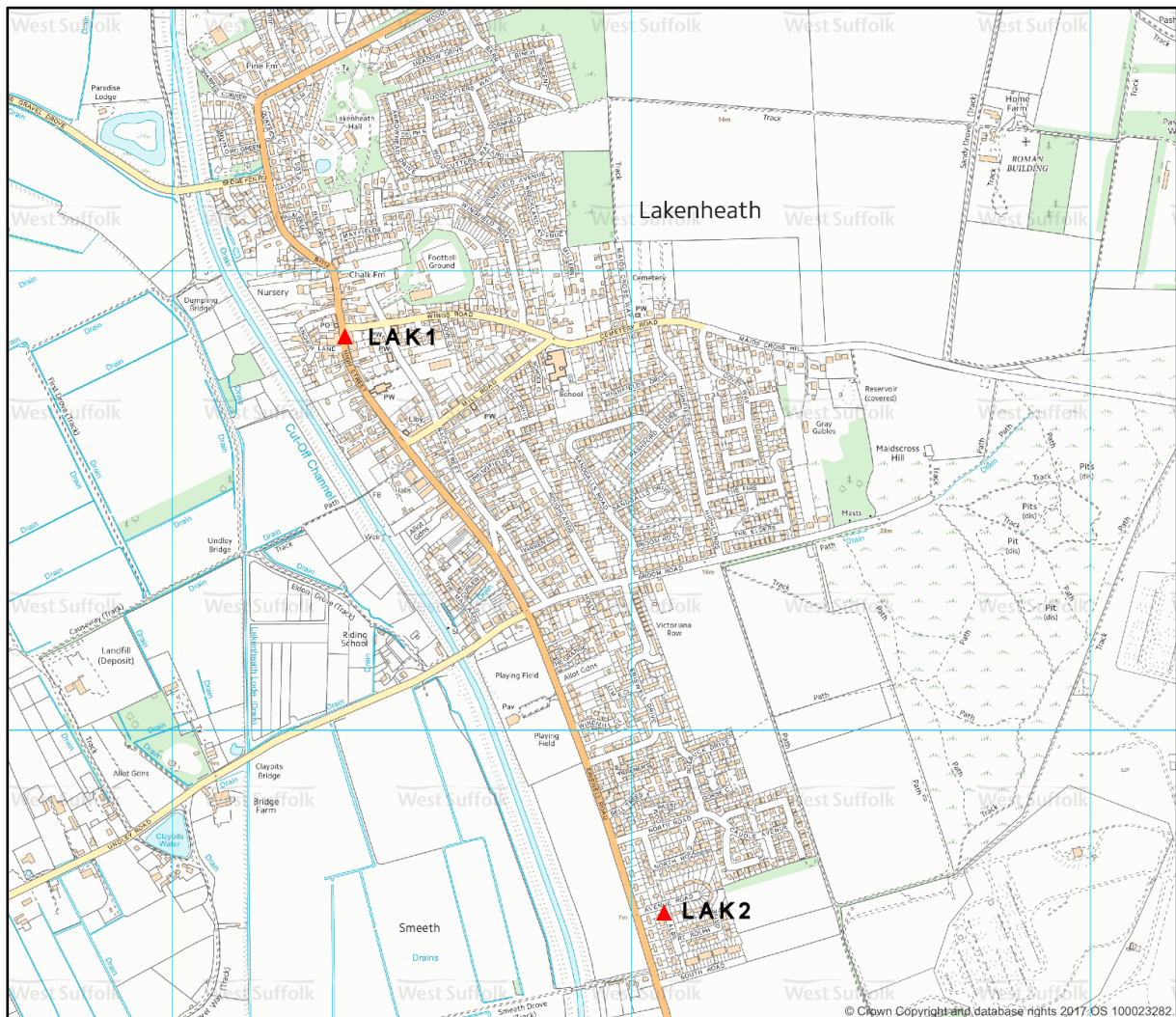
Haverhill Diffusion Tube Locations



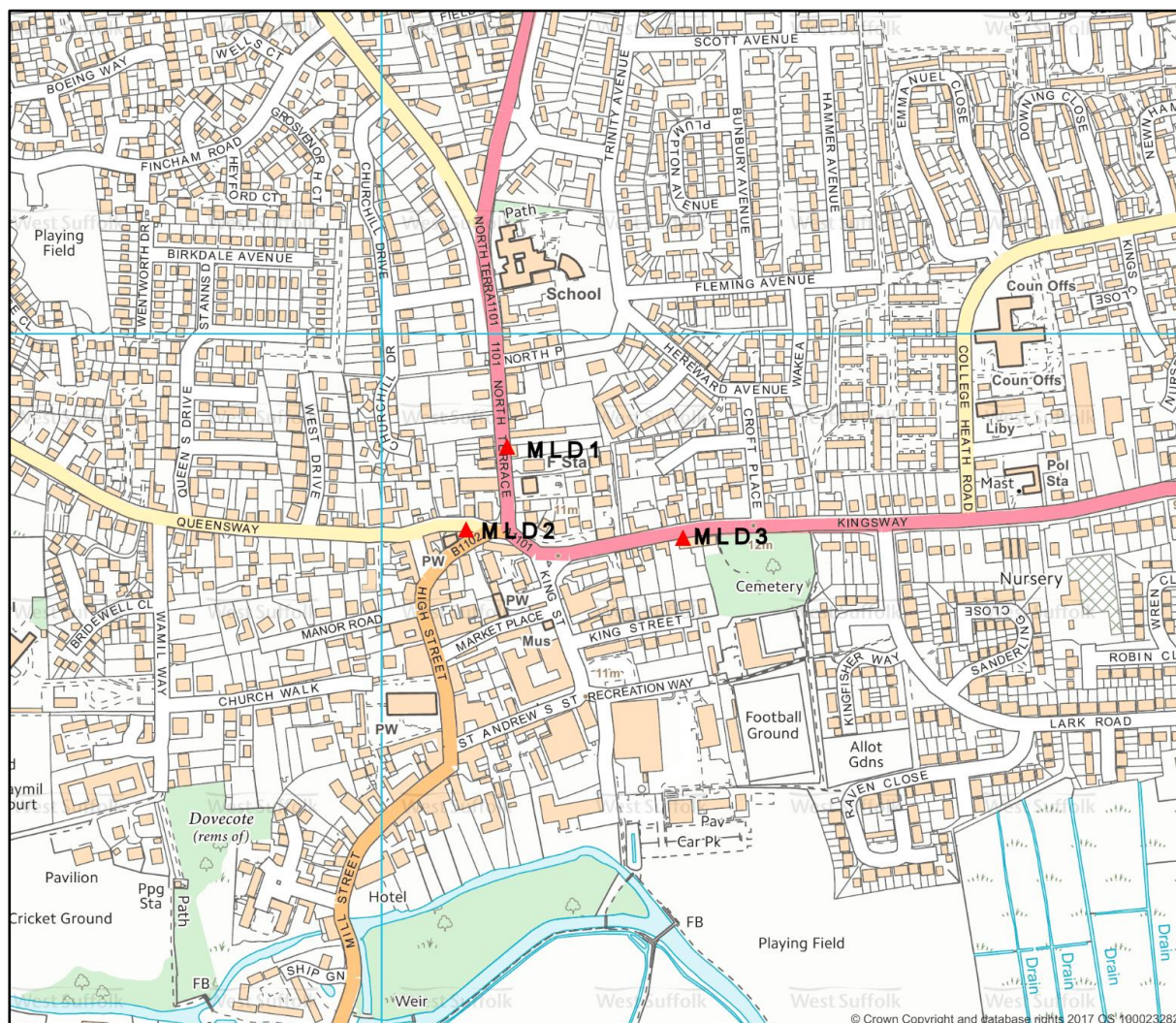
Icklingham Diffusion Tube Location



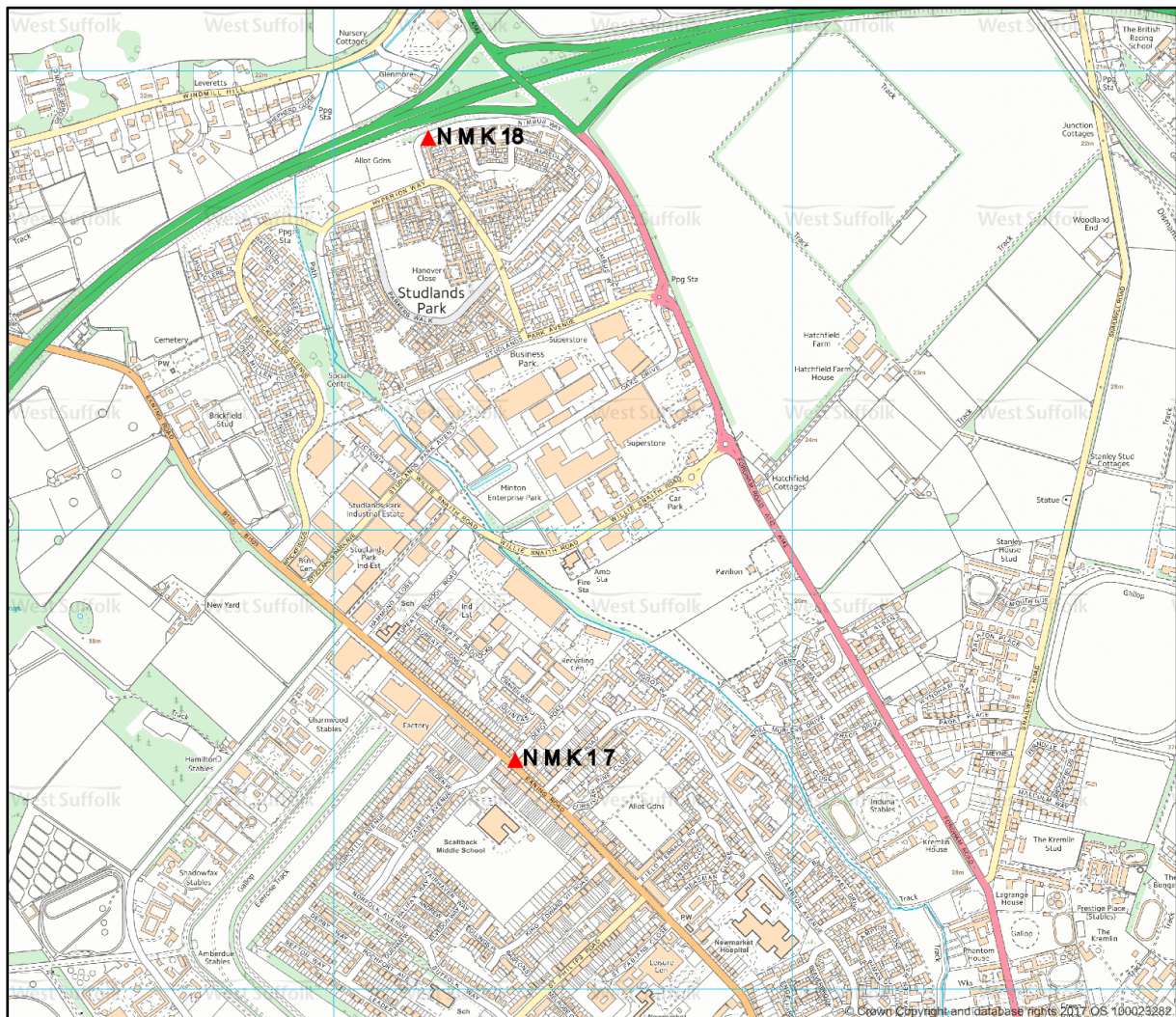
Lakenheath Diffusion Tube Locations



Mildenhall Diffusion Tube Locations

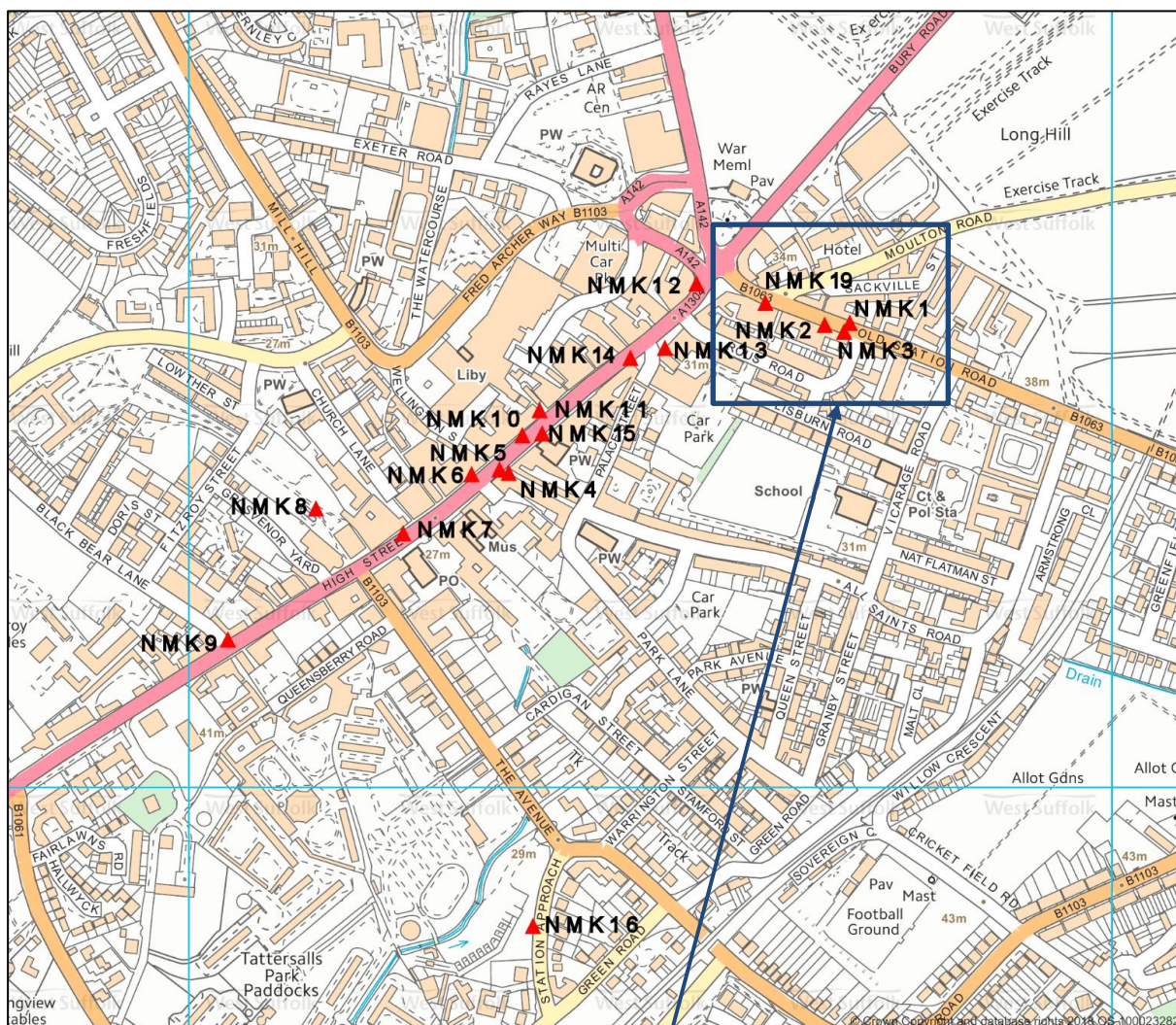


Newmarket (north) Diffusion Tube Locations

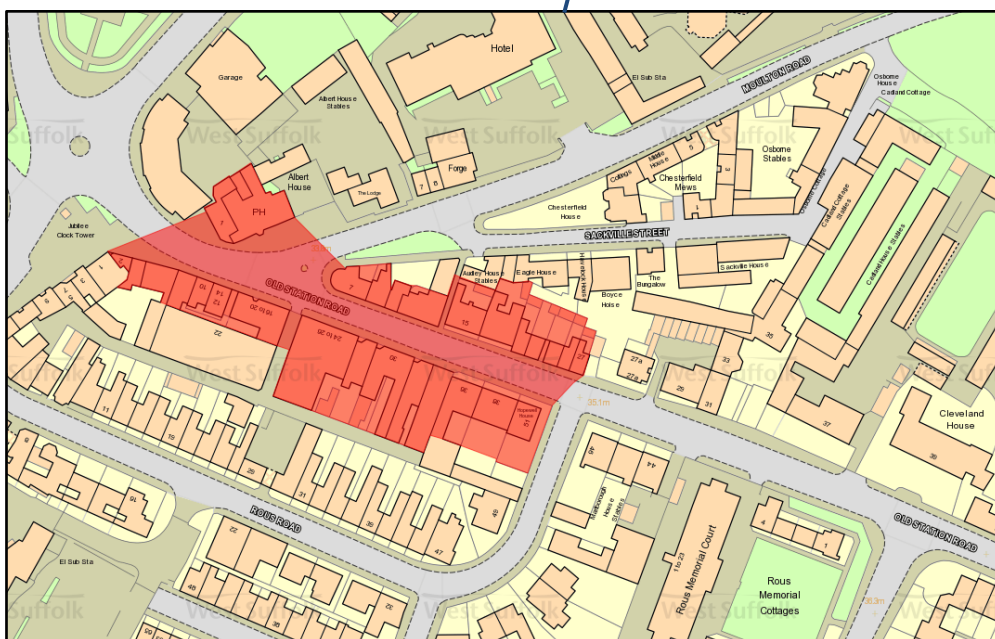


Forest Heath District and St Edmundsbury Borough councils

Newmarket (centre) Diffusion Tube Locations



Newmarket AQMA Location



Appendix E: Summary of Air Quality Objectives in England

Table E.1 – Air Quality Objectives in England

Pollutant	Air Quality Objective ⁴	
	Concentration	Measured as
Nitrogen Dioxide (NO ₂)	200 µg/m ³ not to be exceeded more than 18 times a year	1-hour mean
	40 µg/m ³	Annual mean
Particulate Matter (PM ₁₀)	50 µg/m ³ , not to be exceeded more than 35 times a year	24-hour mean
	40 µg/m ³	Annual mean
Sulphur Dioxide (SO ₂)	350 µg/m ³ , not to be exceeded more than 24 times a year	1-hour mean
	125 µg/m ³ , not to be exceeded more than 3 times a year	24-hour mean
	266 µg/m ³ , not to be exceeded more than 35 times a year	15-minute mean

⁴ The units are in microgrammes of pollutant per cubic metre of air (µg/m³).

Appendix F: Air Quality Improvement Plan

Air Quality Improvement Plan

1. Introduction:

1.1 This plan outlines a variety of actions that West Suffolk councils (St Edmundsbury Borough Council and Forest Heath District Council) are delivering in order to reduce concentrations of air pollutants and exposure to air pollution; thereby positively impacting on the health and quality of life of residents and visitors to the West Suffolk area.

1.2 The plan is not the same as the Air Quality Action Plan identified as required where there is an Air Quality Management Area (such as in Great Barton), but rather an overview of what we are doing across West Suffolk to improve air quality. The improvement plan sets out what we have already achieved and how improving air quality links with other council plans and strategies.

1.3 The key pollutants in West Suffolk are Nitrogen Dioxide (NO₂) and Particulate Matter. In West Suffolk, the majority of the air pollution comes from road transport, but there is a small contribution from industry, conventional heating and domestic solid fuel burning. As the West Suffolk population continues to grow, it is important that there is a plan in place to ensure a coordinated and focused approach to improving air quality.

1.4 Due to continued improvements in vehicle engines, there is a general long term decrease in pollution levels in West Suffolk and there are limited areas where a statutory air quality problem exists. However, improving air quality further will continue to benefit both the health of residents and visitors as well as making our towns and villages more attractive places.

1.5 Progress on measures set out within this Plan will be reported on annually within West Suffolk's Air Quality Annual Status Report.

2. Health effects of poor air quality

2.1 Air quality is one of the most important environmental issues of the present day. In the UK, around 40,000 early deaths annually are attributable to exposure to outdoor air pollution⁵. Air pollution is associated with a number of

⁵ Royal College of Physicians and Royal College of Paediatrics and Child Health, Every Breath we take – The lifelong impact of air pollution, Report of a working party, 2016

Forest Heath District and St Edmundsbury Borough councils

adverse health impacts, for instance, it is recognised as a contributing factor in the onset of heart disease and cancer and has also been linked to stroke and heart disease, diabetes, obesity and changes linked to dementia¹. Air pollution particularly affects the most vulnerable in society; children and older people, and those with heart and lung conditions. There is also a strong correlation with equalities issues, indicating that areas with poor air quality often occur in less affluent areas^{6 7}.

2.2 Public Health England estimate that for the West Suffolk area, the proportion of adult deaths attributable to particulate air pollution in 2015 is slightly above the English average of 4.7%⁸.

3. Supporting plans and strategies

3.1 A number of West Suffolk Councils plans and strategies support the Air Quality Improvement Plan:

- The **West Suffolk Sustainability Strategy 2013-2018** specifies West Suffolk councils' commitment to reducing CO₂ emissions and other environmental impacts.
- The **Bury St Edmunds Town Centre Masterplan**, which sets where growth will happen and the design of streets and spaces in the town centre, all of which can impact air quality.
- The **St Edmundsbury Local Plan** and **Forest Heath Local Plan** play a key role in shaping future development which enables people and goods to move around efficiently and safely to the benefit of the economy and community, with minimum harm to the environment.
- The **West Suffolk Strategic Framework 2018-20** includes our commitment to maximising energy efficiency for our key growth sectors as well as improving the health and wellbeing of families and communities.
- The **Suffolk Health and Wellbeing Board** aims to narrow health inequalities in our affluent and poorer areas across Suffolk.

⁶Environmental equity, air quality, socioeconomic status and respiratory health, 2010

⁷ Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006

⁸ www.phoutcomes.info/

Forest Heath District and St Edmundsbury Borough councils

- The **Suffolk County Council Local Transport Plan 2011-2031** outlines how the county council will work with partners to achieve environmental objectives focussed around reducing air pollution and carbon dioxide emissions. This includes improving travel options such as walking and cycling to reduce congestion and improve air quality across Suffolk.
- The **Emerging West Suffolk Energy Framework** aims to identify the future energy infrastructure demand and supply in relation to a number of factors, including electric vehicles.

The plan is also in line with the **Air Quality Strategy for England, Scotland, Wales and Northern Ireland** which sets out in detail the legislative controls which local government can implement to improve air quality.

4. Partnership working

4.1 We will continue to work with central government and other Suffolk councils to maintain and improve air quality.

4.2 The responsibilities of the two tiers of UK government (central government and local government) are:

- **Central Government** - The Department for Environment Food and Rural Affairs (Defra) manages air quality nationally. It is responsible for the UK Air Quality Standards and for reporting to EU on progress with meeting the European limit values. The Department of Transport are responsible for a number of factors that influence air quality, such as setting the rates for vehicle taxation and funding major transport schemes and infrastructure projects. The Office of Low Emission Vehicles (OLEV) is responsible for promoting and funding electric and other low emission vehicles.
- **Local Government** – Local councils are responsible for Local Air Quality Management, which involves monitoring and reporting on air pollution, and delivering on an Action Plan, if an Air Quality Management Area is identified.
 - **Lower tier** authorities have responsibility for reporting on air quality in an annual status report and preparing Air Quality Action Plans under Local Air Quality Management where necessary.

Forest Heath District and St Edmundsbury Borough councils

- **Upper tier** authorities have control over many aspects responsible for poor air quality, notably transport⁹, but also public health and highways¹⁰.

5. Air Quality Improvement Plan

5.1 As well as performing statutory duties to monitor air quality, reporting the findings and declaring management areas where exceedances of nationally set objectives occur, West Suffolk councils will continue to undertake non-statutory work by promoting cleaner forms of transport and working with Suffolk County Council to promote other sustainable modes of travel such as walking, cycling and public transport. West Suffolk councils will also run campaigns to positively influence the behaviour of the public in areas where air quality benefits will be seen, such as with driving style, vehicle idling and domestic fuel burning.

5.2 The actions set out below are grouped under the following themes:

- 1) Monitoring and reporting air quality in West Suffolk.
- 2) Encourage and enable cleaner and more sustainable travel throughout West Suffolk.
- 3) Limit emissions from existing and new domestic, industrial and traffic sources.

The actions identify initiatives and projects to be implemented by the councils to reduce air pollution from road transport, industry and conventional heating and domestic solid fuel burning, with an overall aim of improving air quality across West Suffolk.

⁹ Review of Local Air Quality Management (LAQM), Defra, 2015

https://consult.defra.gov.uk/communications/lagm_changes/supporting_documents/Consultation%20Impact%20Assessment.pdf

¹⁰ Local Air Quality Management, Policy Guidance, Defra, 2016

Theme 1 - Monitoring and reporting air quality in West Suffolk			
Current position	Action (Planned/Aspirational/Review)	Time-frame	Opportunity to improve air quality (HML)
<p>Monitor air quality throughout West Suffolk</p> <p>Monitoring for the pollutant Nitrogen Dioxide (NO₂) via a network of diffusion tubes. NO₂ is considered the main pollutant of concern and is a known proxy for other pollutants. The majority of pollution in West Suffolk is from road traffic and the majority of the monitoring occurs adjacent to busy roads.</p> <p>Monitoring occurs in approximately 65 locations within the towns and villages of:</p> <ul style="list-style-type: none"> • Brandon • Bury St Edmunds • Great Barton • Haverhill • Lakenheath • Mildenhall • Newmarket <p>Monitoring has historically been carried out in Icklingham, Red Lodge, Elveden, Beck Row and Kentford although monitoring in these locations was discontinued following sustained compliance with the annual objectives.</p>	<p>Review the applicability of NO₂ as a proxy for other pollutants and consider monitoring for other pollutants (e.g. particulates - PM₁₀ or PM_{2.5}) where appropriate.</p> <p>Review locations of monitoring and react to any new information or concerns that may alter the monitoring locations.</p> <p>Review the need for continuous monitoring of NO₂.</p>	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>	<p>Medium</p> <p>Low</p> <p>Low</p>

Forest Heath District and St Edmundsbury Borough councils

<p>Reporting of air quality levels</p> <p>Monitoring results are published on a yearly basis and compared to the Annual Mean Objective for NO₂ in an Annual Status Report, in a template as specified by the Department for Environment, Food & Rural Affairs (DEFRA).</p> <p>Our annual reports are be published on our website (www.westsuffolk.gov.uk/airquality) and, as well as containing the results of our monitoring regime, will also contain details of any specific actions, campaigns or material considerations undertaken in the previous year.</p>	<p>Review statutory reporting requirements and react accordingly.</p> <p>Review the need for publishing clearer or specific data where requested.</p>	<p>Ongoing</p> <p>Ongoing</p>	<p>Low</p> <p>Low</p>
<p>Declare Air Quality Management Areas and maintain Action Plans as necessary</p> <p>Air Quality Management Areas (AQMA) are declared where the annual mean objective is consistently exceeded at relevant receptors.</p> <p>AQMAs currently exist in Great Barton, Newmarket, and on Sicklesmere Road in Bury St Edmunds. Action Plans specifically to address the issues within these AQMAs are being produced.</p>	<p>Planned to publish Air Quality Action Plans for the AQMAs in Great Barton and Sicklesmere Road.</p> <p>Review the need for the Newmarket AQMA following the completion of 2018 annual monitoring.</p> <p>Review the need for further AQMAs where monitoring results indicate this is necessary.</p>	<p>2018</p> <p>2019</p> <p>Ongoing</p>	<p>High</p> <p>Low</p> <p>Low</p>

Theme 2 – Encourage and enable cleaner and more sustainable travel throughout West Suffolk			
Current position	Action (Planned/Aspirational/Review)	Time-frame	Opportunity to improve air quality (HML)
<p>Promote zero Emission Electric Vehicles (EVs) to the general public and businesses</p> <p>In both 2016 and 2017, West Suffolk councils held EV Showcases in the Arc shopping centre in Bury St Edmunds. These events have promoted the range of vehicles available and their air quality benefits, with a focus on providing information on the abilities of these vehicles and challenging preconceptions.</p> <p>These events have been used to help gather information on the current opinions of members of the public with regards to EVs, such as barriers to EV uptake for West Suffolk residents.</p>	<p>Planned to run further EV promotional events aimed at members of the public in partnership with local (West Suffolk) dealerships.</p> <p>Review the venue and timing of events to ensure maximum exposure to the widest audience.</p> <p>Planned to run EV promotional events aimed specifically at businesses, in tandem with the wider business events such as the West Suffolk Business Festival.</p>	<p>Yearly (Summer)</p> <p>Yearly</p> <p>Yearly (Autumn)</p>	<p>Medium</p> <p>Low</p> <p>Medium</p>
<p>Invest in Electric Vehicle charging infrastructure</p> <p>Standard 7kWh charging infrastructure is available to the public in the following West Suffolk owned car parks:</p> <ul style="list-style-type: none"> • Ram Meadow, Bury St Edmunds • Parkway Multi-Storey Car Park, Bury St Edmunds 	<p>Aspire to install on street charging in areas where residents have no off street charging options (i.e. no driveways) to enable these residents to be able to purchase EVs. This will be achieved through the OLEV On-Street Residential Chargepoint Scheme.</p>	<p>2018</p>	<p>Medium</p>

Forest Heath District and St Edmundsbury Borough councils

<ul style="list-style-type: none"> • The Guineas, Newmarket • Ehringshausen Way, Haverhill <p>Lack of charging infrastructure was the main barrier to EV uptake identified through the survey at the 2017 West Suffolk EV showcase and therefore West Suffolk councils need to invest in additional charging infrastructure.</p>	<p>Planned to install a rapid chargepoint in the centre of Bury St Edmunds with funding assistance from Highways England.</p>	Summer 2018	Medium
	<p>Aspire to install rapid charging infrastructure in Newmarket public car parks.</p>	2018 / 2019	Low
	<p>Aspire to install standard charging in public car parks in towns with no current provision (Mildenhall, Brandon and Clare)</p>	2018 / 2019	Low
<p>Work with Suffolk County Council Highways</p> <p>We regularly work with Suffolk County Council Highways, who have a designated contact for air quality.</p>	<p>Planned to continue working with Suffolk County Council in a proactive and positive manner, responding to consultations and requests where appropriate.</p>	Ongoing	Low
<p>Promote and provide grants for Electric Vehicles to West Suffolk businesses</p> <p>West Suffolk Greener Business Grant, (up to £1,000 funding) and the regional BEE Anglia Grant (up to £50,000 funding) are promoted to local businesses.</p> <p>A targeted campaign to local taxi firms has already been undertaken.</p>	<p>Review grants that are applicable to electric vehicles and promote new grants to businesses as and when they become available.</p>	Ongoing	Low

Forest Heath District and St Edmundsbury Borough councils

We have also undertaken cost / benefit analysis for local organisations who are looking to move to Electric Vehicles.			
Theme 3 - Limit emissions from existing and new domestic, industrial and traffic sources			
Current position	Action (Planned/Aspirational/Review)	Time-frame	Impact on air quality (HML)
<p><i>Environmental Permitting Regulations</i></p> <p>Environmental Permits are issued by West Suffolk councils under Part B of the Environmental Permitting Regulations for businesses that could impact on the local air quality Pollutants from these facilities are controlled and monitored in line with the permit and action is taken where these permits are not followed to ensure that any air quality impacts are limited.</p>	<p>Review the area periodically to identify any new businesses that may require Environmental permitting and issue where necessary.</p> <p>Planned to continue inspection duties at all permitted sites.</p>	<p>Ongoing</p> <p>Yearly</p>	<p>Low</p> <p>Low</p>
<p><i>Assess impact on air quality from new developments</i></p> <p>West Suffolk councils assess all planning applications to determine whether they require an air quality assessment, using the criteria within the EPUK document "<i>Land-Use Planning & Development Control: Planning For Air Quality</i>" to determine appropriate action.</p> <p>Bespoke actions are taken where an Air Quality Assessment identifies a potentially significant impact from or to developments.</p>	<p>Planned to continue reviewing all planning applications to assess their impact on air quality and take action where necessary.</p>	<p>Ongoing</p>	<p>Medium</p>

<p><i>Request Electric Vehicle charging points for new developments through the planning regime</i></p> <p>All major applications (in terms of planning – i.e. 10 or more dwellings or greater than 1000m² of commercial floorspace) are subject to measures to help reduce the impact on Local Air Quality. All major developments are targeted as there are very few developments which will show a direct impact on local air quality, but all developments will have a cumulative effect. This is justified by a combination of local and national guidance such as the NPPF, Suffolk parking standards and the West Suffolk Core Strategy.</p> <p>Currently we request:</p> <ul style="list-style-type: none"> • All dwellings with off street parking should be provided with an operational electric vehicle charge point, with an electric supply to the charge point capable of providing a 7kW charge. • 5% of spaces within commercial developments shall be equipped with electric vehicle charging points. • Charging points at 'destinations' (such as hotels) or publically available facilities (such as out of town fast food restaurants) requested on a bespoke basis 	<p>Planned to strengthen the need for EV charging points within new developments by incorporating this within updated local strategies. High level work on this has begun and a coordinated approach throughout Suffolk has been discussed.</p>	<p>2018</p>	<p>Medium</p>
---	--	-------------	---------------

Forest Heath District and St Edmundsbury Borough councils

depending on the exact nature of the facility and the intended uses.			
Undertake behavioural change campaigns We are working on and promoting a number of behavioural change campaigns including: <ul style="list-style-type: none"> • Anti-Idling Campaign aimed at reducing vehicle idling, especially outside schools. • Eco Driving courses provided free by the Energy Savings Trust were promoted at the EV promotional event and have been offered to West Suffolk Staff. 	Planned to launch the anti-idling campaign, initial targeting schools. Planned to continue promoting eco driving courses both to West Suffolk staff as well as to external individuals and companies.	2018 2018	Low Low
Promote better domestic fuel burning We provide useful information on efficient fuel burning on our website and distribute on social media or by other means where possible and appropriate. The information materials are produced by Defra.	Review guidance and promotional materials and update website as and when necessary.	Ongoing	Medium

Glossary of Terms

Abbreviation	Description
AQAP	Air Quality Action Plan - A detailed description of measures, outcomes, achievement dates and implementation methods, showing how the local authority intends to achieve air quality limit values'
AQMA	Air Quality Management Area – An area where air pollutant concentrations exceed / are likely to exceed the relevant air quality objectives. AQMAs are declared for specific pollutants and objectives
ASR	Air quality Annual Status Report
Defra	Department for Environment, Food and Rural Affairs
DMRB	Design Manual for Roads and Bridges – Air quality screening tool produced by Highways England
EU	European Union
FDMS	Filter Dynamics Measurement System
FHDC	Forest Heath District Council
LAQM	Local Air Quality Management
NO ₂	Nitrogen Dioxide
NO _x	Nitrogen Oxides
PM ₁₀	Airborne particulate matter with an aerodynamic diameter of 10µm (micrometres or microns) or less
PM _{2.5}	Airborne particulate matter with an aerodynamic diameter of 2.5µm or less
QA/QC	Quality Assurance and Quality Control
SEBC	St Edmundsbury Borough Council
SO ₂	Sulphur Dioxide
...	...



St Edmundsbury Borough Council Air Quality Action Plan

Great Barton Air Quality Management Area

In fulfilment of Part IV of the
Environment Act 1995
Local Air Quality Management

June 2018

Local Authority Officer	Matthew Axton
Department	Environment and Energy Team Planning & Regulatory Service
Address	West Suffolk House Western Way Bury St Edmunds IP33 3YU
Telephone	01284 757400
E-mail	Environment@westsuffolk.gov.uk
Report Reference number	GB AQAP 001
Date	June 2018

Executive Summary

This Air Quality Action Plan (AQAP) has been produced as part of our statutory duties required by the Local Air Quality Management framework. It outlines the action we will take to improve air quality in Great Barton between 2018 and 2022. This is the first air quality action plan produced for Great Barton.

Air pollution is associated with a number of adverse health impacts. It is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions.

The annual health cost to society of the impacts of particulate matter alone in the UK is estimated to be around £16 billion¹. St Edmundsbury Borough Council and Suffolk County Council are committed to reducing the exposure of people in Great Barton to poor air quality in order to improve health.

We have developed actions that can be considered under 4 broad topics:

- Traffic management
- Promoting low emission transport
- Public information
- Transport planning and infrastructure

Our priorities are improving traffic flow through the AQMA. The only feasible identified project to achieve this being the moving of the pedestrian crossing away from the AQMA. We are also exploring ways of reducing HGV's travelling through the AQMA (for example, by removing restrictions on the A1088).

In this AQAP we outline how we plan to effectively tackle air quality issues within our control. However, we recognise that there are a large number of air quality policy areas that are outside of our influence (such as vehicle emissions standards agreed in Europe), but for which we may have useful evidence, and so we will continue to work with regional and central government on policies and issues beyond St Edmundsbury's direct influence.

¹ Defra. Abatement cost guidance for valuing changes in air quality, May 2013

Responsibilities and Commitment

This AQAP was prepared by the Environment and Energy Team of St Edmundsbury Borough Council with the support and agreement of Suffolk County Council.

This AQAP has been approved by:

- David Collinson (St Edmundsbury Borough Council)
- Sue Roper (Suffolk County Council)

This AQAP will be subject to an annual review, appraisal of progress and reporting to the Licensing and Regulatory Council Committee. Progress each year will be reported in the Annual Status Reports (ASRs) produced by West Suffolk councils (St Edmundsbury Borough Council and Forest Heath District Council), as part of our statutory Local Air Quality Management duties.

If you have any comments on this AQAP please send them to Matthew Axton using the details contained on the contact page above.

Table of Contents

Executive Summary	i
Responsibilities and Commitment	ii
1 Introduction	1
2 Summary of Current Air Quality in the Great Barton Air Quality Management Area.....	2
3 St Edmundsbury Borough Council's Air Quality Priorities	6
3.1 Public Health Context.....	6
3.2 Planning and Policy Context.....	6
3.3 Source Apportionment.....	7
3.4 Key Priorities	8
4 Development and Implementation of St Edmundsbury Borough Council Great Barton AQAP	10
4.1 Consultation and Stakeholder Engagement.....	10
4.2 Steering Group	11
5 AQAP Measures	12
Appendix A: Response to Consultation	16
Appendix B: Reasons for Not Pursuing Action Plan Measures	24
Glossary of Terms	25

List of Tables

Table 1 - Summary of Traffic Data from the Department of Transport website* (Count Point 26704) – Number of vehicles per day	5
Table 2 - Source apportionment by vehicle type.....	8
Table 3 - Consultation Undertaken	10
Table 4 – Air Quality Action Plan Measures	13

List of Figures

Figure 1 - Trends in Concentration of Nitrogen Dioxide in Great Barton (2012 to 2017)	3
Figure 2 - Air Quality Monitoring Points	4
Figure 3 - AQMA and Air Quality Monitoring Points.....	4

1 Introduction

This report outlines the actions that St Edmundsbury Borough Council will deliver between 2018 and 2022 in order to reduce concentrations of air pollutants and exposure to air pollution; thereby positively impacting on the health and quality of life of residents and visitors within the Great Barton Air Quality Management Area.

It has been developed in recognition of the legal requirement on the local authority to work towards Air Quality Strategy (AQS) objectives under Part IV of the Environment Act 1995 and relevant regulations made under that part and to meet the requirements of the Local Air Quality Management (LAQM) statutory process.

This Plan will be reviewed every five years at the latest and progress on measures set out within this Plan will be reported on annually within West Suffolk councils' air quality Annual Status Report.

2 Summary of Current Air Quality in the Great Barton Air Quality Management Area

Please refer to the latest ASR from West Suffolk councils for more detailed information on the current air quality throughout the borough.

Great Barton is a village approximately 4km north east of the centre of Bury St Edmunds, which is the largest town in west Suffolk. The A143 cuts through the centre of Great Barton. The A143 is the main road linking Bury St Edmunds to a number of rural areas as well as south Norfolk towns such as Diss and Great Yarmouth. The A143 is a designated Strategic Lorry Route on the Suffolk lorry route network (<https://www.suffolk.gov.uk/assets/Roads-and-transport/lorry-management/Lorry-Route-Map-Amended-FEB17.pdf>).

Along the A143 in Great Barton, monitoring for nitrogen dioxide (NO₂), using diffusion tubes, has taken place since 2007. Exceedances have been recorded throughout that time and an AQMA was previously in place between 2009 and 2012, however, this was revoked on the basis of legal advice at that time. The AQMA was reinstated after a review following the publication of national guidance in April 2016 and was formerly re-declared on 18th April 2017. Current monitoring locations and the extent of the AQMA are shown in figures overleaf.

The AQMA is limited in size, comprising numbers 1 to 8 and Gatehouse Cottage, The Street, Great Barton. These properties are almost the only dwellings in Great Barton where the building has a roadside frontage, with most other dwellings in the village generally being set back from the road behind medium to large front gardens.

Opposite the AQMA, the road is bordered by a flint and brick wall, wooden fence and heavy vegetation, which restrict dispersion of pollutants. The only controlled crossing of the A143 in Great Barton is also adjacent to the AQMA, which disturbs traffic flow in the area. Two minor roads also join the A143 just to the east of the AQMA, which also causes further disturbance of traffic flow and acceleration through the sensitive area. The pedestrian crossing and junctions are often especially busy during the school pick up and drop off period due to the proximity of the village school. Traffic also queues (during the afternoon peak period) through the village due to congestion at a junction to the east of the village.

The most recent (2017) annual mean value for nitrogen dioxide at the key monitoring location is $36.0\mu\text{g}/\text{m}^3$, which is marginally below the Air Quality Objective (AQO) of $40.0\mu\text{g}/\text{m}^3$. However, it should be recognised that this monitoring point is just beyond the end of the row of cottages and therefore a further two monitoring locations (GB6 and GB7) have been added within the AQMA at the beginning of 2018. Initial data from these two points suggests that these new locations will be above the AQO of $40.0\mu\text{g}/\text{m}^3$ being approximately 30% higher than the existing monitoring location of GB4. An annual mean for this data will not be available until a full year of data is collected at the end of 2018.

The concentration of NO_2 has fallen steadily over the past few years as shown in the below graph. This reduction in pollution has been at a quicker rate than average for the monitoring points in the West Suffolk councils' area.

Figure 1 - Trends in Concentration of Nitrogen Dioxide in Great Barton (2012 to 2017)

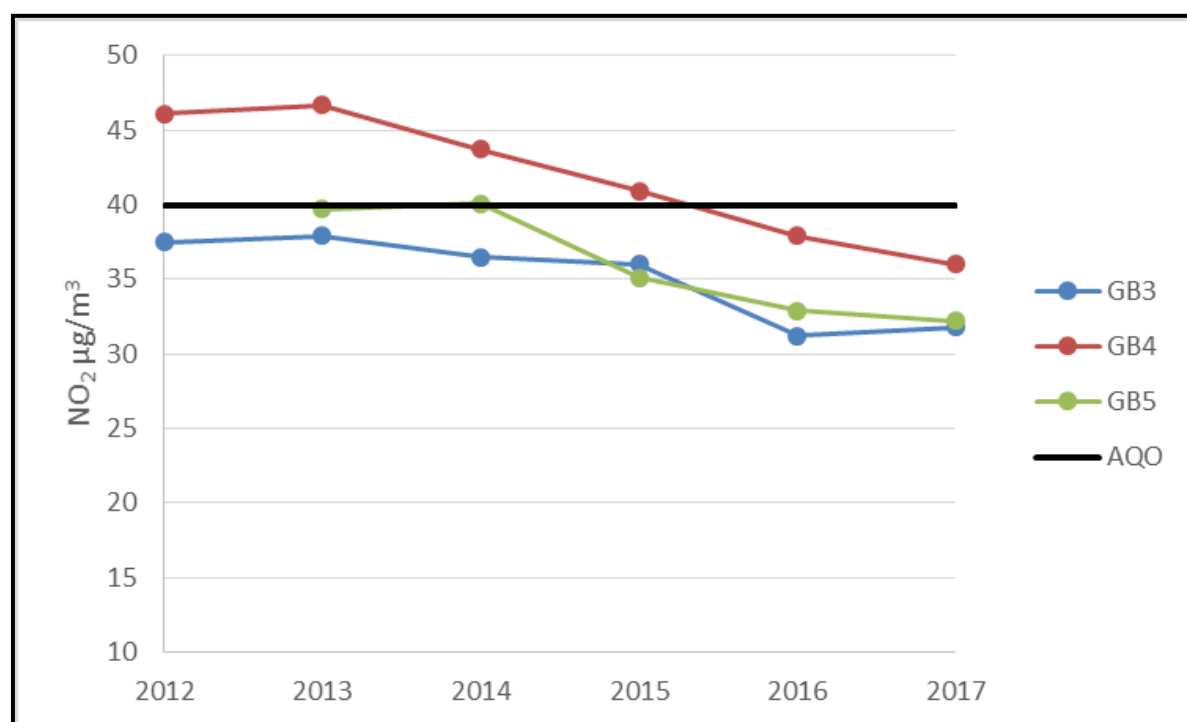


Figure 2 - Air Quality Monitoring Points

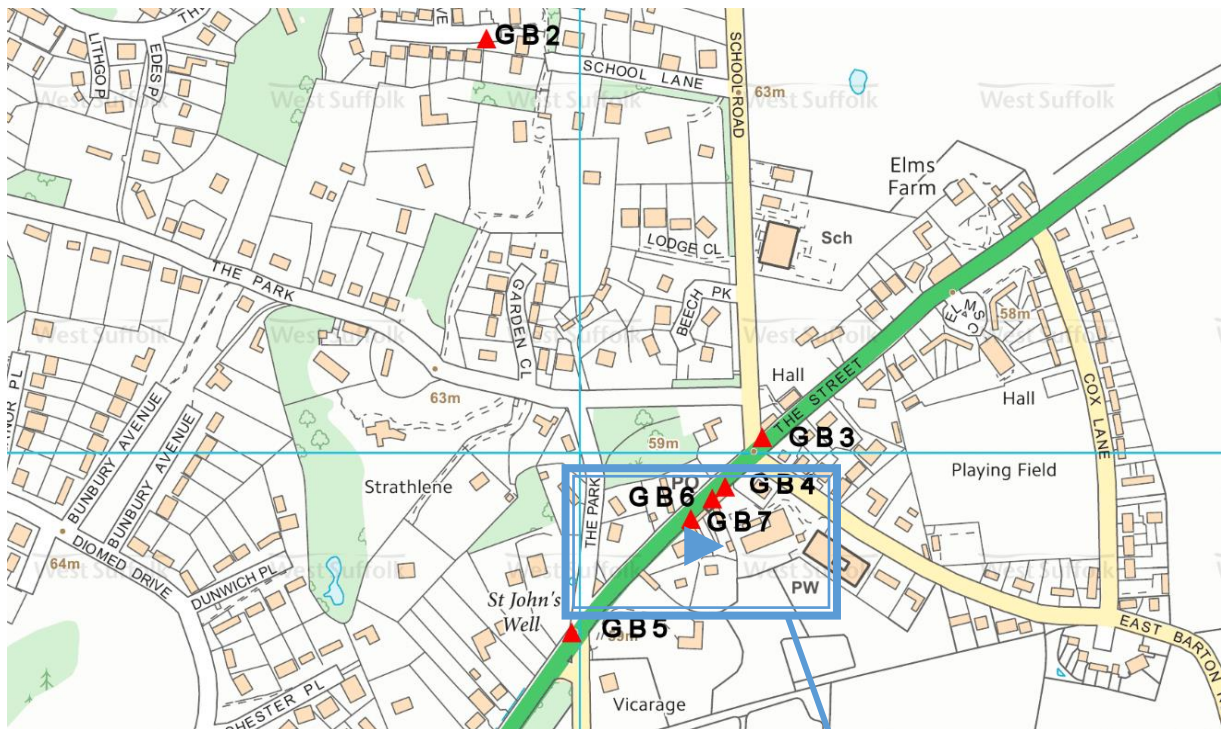
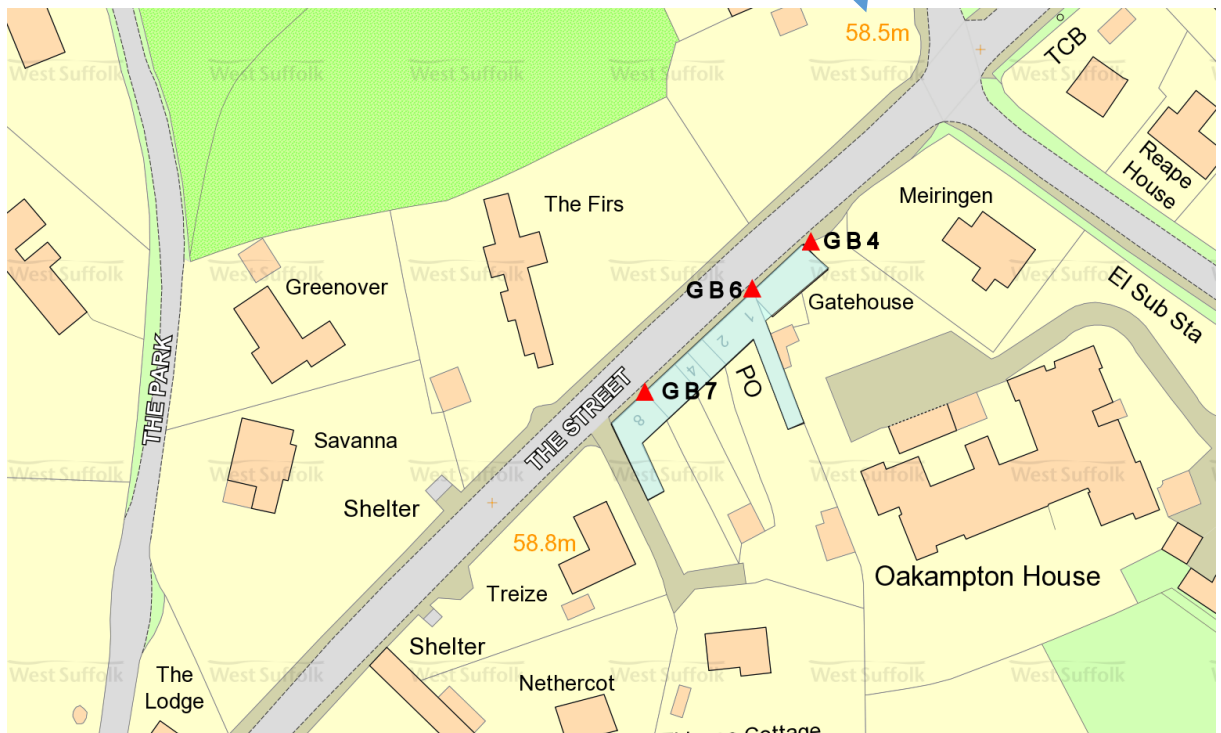


Figure 3 - AQMA and Air Quality Monitoring Points



St Edmundsbury Borough Council

Traffic data from the Department of Transport, shows a slight increase in overall traffic volumes along the A143 over the last 5 years.

Table 1 - Summary of Traffic Data from the Department of Transport website* (Count Point 26704) – Number of vehicles per day

Year	Motor Cycles	Cars	Buses / Coaches	Light Goods Vehicles	Heavy Goods Vehicles	Total Motor Vehicles
2012	97	11002	104	1843	1168	14214
2013	100	10977	102	1907	1161	14248
2014	106	11386	138	1953	1057	14640
2015	106	11307	140	2127	1115	14793
2016	100	11416	141	2260	1124	15041

*www.dft.gov.uk/traffic-counts/

3 St Edmundsbury Borough Council's Air Quality Priorities

3.1 Public Health Context

Local air quality is a clear public health issue and following a reform of public health services, local authorities now have a duty to carry out a public health function in relation to air quality. Local authorities therefore need to promote links with departments including public health, environmental protection, transport, planning and sustainability to raise awareness of the effect of air pollution on public health and to encourage local action to be taken. St Edmundsbury Borough Council, as part of the Suffolk Air Quality Group, is working with the Public Health division within the County Council on ways to better integrate and promote LAQM work across these disciplines as well as working with Suffolk County Council Travel Planners and Borough and District Planning Policy teams to ensure that air quality is appropriately considered and integrated into local travel plans and planning policy documents.

The Department for Health's Public Health Outcomes Framework includes an indicator related to air pollution on the "fraction of mortality attributable to Particulate air pollution", broken down by local authority. In St Edmundsbury Borough Council this fraction is reported as 5.0% which is slightly higher than the English average of 4.7%. Actions that are considered to reduce road traffic related emissions of NO₂ are also likely to address emissions of particulates thus contributing to an improvement in this indicator.

3.2 Planning and Policy Context

St Edmundsbury Borough Council have adopted site allocation documents Bury St Edmunds, Haverhill and Rural vision 2031 which form part of the local plan and were adopted in 2014. The Core Strategy for St Edmundsbury Borough Council was adopted in 2010, whilst the West Suffolk Joint Development Management Policy Document was adopted by St Edmundsbury Borough and Forest Heath District councils in 2015. Planning Policy documents can be found at:

www.westsuffolk.gov.uk/planningpolicy

A number of allocated development sites are of particular relevance to Great Barton, including the North-East Bury St Edmunds Strategic Site (Policy BV6, Bury St

Edmunds Vision 2031), which is proposed to deliver approximately 1250 homes between Bury St Edmunds and Great Barton, directly adjacent to the A143. This development is not expected to deliver a by-pass for Great Barton, but should facilitate the future provision of an A143 Great Barton by-pass. An allocated site within Great Barton, Land at School Road (Policy RV18, Rural Vision 2031), allows for the provision of 40 dwellings up to 2031. Policy RV18 states that the development on Land at School Road “*will need to respect and respond appropriately to issues of congestion, air quality...*”

General policies relevant to air quality include Policy CS2 E) of the Core Strategy which states:

“A high quality, sustainable environment will be achieved by designing and incorporating measures appropriate to the nature and scale of development, including: ...

E) conserving and, wherever possible, enhancing other natural resources including, air quality and the quality and local distinctiveness of soils”

Policy DM14 of the Joint Development Management Policy Document, which states:

“Proposals for all new developments should minimise all emissions and other forms of pollution (including light and noise pollution) and ensure no deterioration to either air or water quality.”

3.3 Source Apportionment

The AQAP measures presented in this report are intended to be targeted towards the predominant sources of emissions within the Great Barton Air Quality Management Area.

A source apportionment exercise undertaken by West Suffolk in line with Defra guidelines in 2017 using 2016 traffic data and air quality data. This identified that within the AQMA, the percentage source contributions are detailed in Table 2:

Table 2 - Source apportionment by vehicle type

	Motor Cycles	Cars	Buses / Coaches	Light Goods Vehicles	Heavy Goods Vehicles	Total Motor Vehicles
Percentage as volume of traffic	0.7	75.9	0.9	15	7.5	100
Percentage as roadside NO _x contribution	0.1	43.5	6.4	19.7	30.3	100

Overall, in 2016, roadside contributed 73.6% of the NO_x pollution, whilst background levels contributed to 26.4%. It should be noted that when data is available from the new monitoring locations, this background percentage contribution may reduce due to the likely higher overall concentration.

3.4 Key Priorities

The only significant source of air pollution at the site is the traffic travelling along the A143, with cars causing over 40% of this pollution and HGVs causing over 30%, however HGVs make up less than 10% of the overall traffic volume. Reducing the number of HGVs travelling through the AQMA would therefore be the most effective way to reduce the levels of pollution being produced.

It is also apparent that the very local circumstances of the AQMA contribute significantly to the problem, as monitoring locations on the A143 outside the AQMA are noticeably lower. Therefore measures to improve the flow of traffic through the AQMA, such as moving the pedestrian crossing, could also benefit the Air Quality.

- Reduce HGV numbers by investigating lifting of restrictions on other routes and engaging with local businesses.
- Improve flow of traffic by, for example, moving the pedestrian crossing out of the immediate proximity of the AQMA and by making improvements to junctions that impact on the AQMA
- Ensure local developments take into account and contribute positively to the local air quality.

The provision of a by-pass will undoubtedly solve the air quality issues within Great Barton and the principle of a by-pass is generally supported by local residents, St Edmundsbury Borough Council and Suffolk County Council. However, it is recognised that this would constitute a multi-million pound investment and that the

funding is not currently available and is unlikely to become available as a result of inclusion within this Air Quality Action Plan. We therefore recognise that action on more achievable measures is considered appropriate.

4 Development and Implementation of St Edmundsbury Borough Council Great Barton AQAP

4.1 Consultation and Stakeholder Engagement

When consulting on the declaration of the AQMA, we requested comments on potential causes of the high pollution levels and potential measures for inclusion in the AQAP. This consultation went out to all the bodies listed in Table 3 below, as required by Schedule 11 of the Environment Act 1995. In addition, we directly consulted all residents within approximately 300m of the centre of the proposed AQMA.

The response to our consultation stakeholder engagement is given in Appendix A.

Table 3 - Consultation Undertaken

Yes/No	Consultee
Yes	the Secretary of State
Yes	the Environment Agency
Yes	the highways authority
Yes	all neighbouring local authorities
Yes	other public authorities as appropriate, such as Public Health officials
Yes	bodies representing local business interests and other organisations as appropriate

Responses to the consultation highlighted numerous issues, which have been grouped into the following topics:

- General volume of traffic (5 respondents)
- Lack of space for dispersion (3 respondents)
- Location of crossing (7 respondents – 3 respondents highlighting the importance of the crossing)

- Traffic movements with the East Barton Road and School Road (5 respondents)
- Traffic build up due to junctions away from key area (1 respondent)
- Bus stops disturbing flow of traffic (5 respondents)
- Proposed additional housing (4 respondents)
- Proximity of the school (1 respondent)
- Need for by-pass (2 respondents)

4.2 Steering Group

The steering Group has now met on three occasions and consists of the following key people:

- St Edmundsbury Borough Council Air Quality Officer
- Suffolk County Council Highways Engineer
- St Edmundsbury Borough Council Principal Planning Officer
- St Edmundsbury Borough Council Ward Member for Great Barton (Chair)
- Great Barton Parish Council Chairman
- Great Barton Local Plan member responsible for Environment
- Great Barton Primary Academy representative
- Local Representatives (x2)

5 AQAP Measures

Error! Reference source not found. shows the St Edmundsbury Borough Council AQAP measures relating to the Great Barton AQMA. It contains:

- a list of the actions that form part of the plan
- the responsible individual and departments/organisations who will deliver this action
- expected benefit in terms of pollutant emission and/or concentration reduction
- the timescale for implementation
- how progress will be monitored

NB: Please see future ASRs for regular annual updates on implementation of these measures

Table 4 – Air Quality Action Plan Measures

Measure No.	Measure	EU Category	EU Classification	Lead Authority	Planning Phase	Implementation Phase	Key Performance Indicator	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
1	Great Barton bypass	Traffic Management	Strategic highway improvements, Re-prioritising road space away from cars, inc Access management, Selective vehicle priority, bus priority, high vehicle occupancy lane	Suffolk County Council	N/A	N/A	N/A	N/A	N/A	N/A	Currently unlikely to progress due to insufficient funding
2	Moving of the pedestrian crossing	Traffic Management	UTC, Congestion management, traffic reduction	Suffolk County Council	2018	2019	Reductions in Concentrations to below the objective	Greater reduction in concentrations than at other monitoring location in Great Barton. Study to quantify reduction being commissioned.	Broad feasibility study carried out	2019	Planning condition on DC/17/1166/FUL requires the provision of crossing points linking the existing footways of The Street
3	Improvement of 'Bunbury Arms' junction to Thurston	Traffic Management	Strategic highway improvements, Re-prioritising road space away from cars, inc Access management, Selective vehicle priority, bus priority, high vehicle occupancy lane	Suffolk County Council	2018-2020	2021	Monitoring of queues through Great Barton	To be confirmed.	Outline design completed	2021	Section 106 funding has been secured from developments in Thurston (within Mid Suffolk District Council). This will be the second scheme delivered through this funding.

Measure No.	Measure	EU Category	EU Classification	Lead Authority	Planning Phase	Implementation Phase	Key Performance Indicator	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
4	Amendments to lorry restrictions on A1088	Freight and Delivery Management	Route Management Plans/ Strategic routing strategy for HGV's	Suffolk County Council	Unknown	Unknown	Reduction in lorries using the A143	Approximately 1µg/m³ reduction for every 100 HGVs diverted per day.	None	Unknown	HGV restrictions on the A1088 mean more HGV's use the A143. Investigations ongoing into the reasoning for and current applicability of the restrictions on the A1088. It is recognised that this measure would have a potential negative impact outside of West Suffolk jurisdiction and would require very careful consideration and environmental assessment.
5	Amendments to School Road to make one way traffic	Traffic Management	Strategic highway improvements, Re-prioritising road space away from cars, inc Access management, Selective vehicle priority, bus priority, high vehicle occupancy lane	Suffolk County Council	N/A	N/A	N/A	N/A	Assessed and considered not currently feasible	N/A	Preventing traffic from exiting School Road on to the A143 would allow smoother traffic flow on A143 and prevent fast acceleration from School Road through the AQMA – Not currently feasible – See Appendix B
6	Anti-idling campaigns	Public Information	Via other mechanisms	West Suffolk	2017 / 2018	2018	Reduction in vehicle idling	Minimal	Awareness Campaign under development	Spring 2018	West Suffolk wide campaign. Unlikely to have a direct impact on the AQMA, although could reduce background levels.

Measure No.	Measure	EU Category	EU Classification	Lead Authority	Planning Phase	Implementation Phase	Key Performance Indicator	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
7	Targeted HGV campaigns	Public Information	Via other mechanisms	West Suffolk	2018	2018 / 2019	Reduction in HGVs through AQMA at busy periods	1-2%	n/a	Summer 2018	Campaign to target companies that have lorries that use the A143 on a regular basis to avoid peak times.
8	Section 106 improvements	Transport Planning and Infrastructure	Cycle network / Bus route improvements	West Suffolk	2018	TBC	Better sustainable access to Bury St Edmunds	To be confirmed once detailed applications are submitted.	None	TBC	Advocate for more sustainable transport links with Bury St Edmunds through section 106 agreements on local strategic development sites.
9	Increased electric vehicle charge points (West Suffolk wide project)	Promoting Low Emission Transport	Procuring alternative Refuelling infrastructure to promote Low Emission Vehicles, EV recharging, Gas fuel recharging	West Suffolk	Ongoing	Ongoing	Number of charge points within West Suffolk	Unknown	Numerous charge points secured through planning conditions	Ongoing	Schemes to increase the number of charge points throughout West Suffolk, including through planning and through direct West Suffolk investment.
10	Filters / screens for directly affected residents	No Suitable Category	N/A	West Suffolk	2018	2018	Filters / screens installed	N/A	N/A	2018	Provision of filters or screens for the front windows of directly affected residents.

Appendix A: Response to Consultation

Table A.1 – Summary of Responses to AQMA declaration Consultation

Topic	Responses	Discussion
General volume of traffic (including a significant proportion of HGVs)	<p>① Most prevalent factors are the density of traffic during peak hours</p> <p>② We moved to The Street 50 years ago, the traffic volume has increased so much it can take 10 minutes to leave our property (next to no.X) between 7am and 9am and 4pm and 6pm. The traffic just crawls, at night almost to a standstill despite the crossing not used and the shop closes at 1pm every day. Our garden plants are black with pollution.</p> <p>③ Ticked</p> <p>④ The traffic volume is such that it is dangerous to walk on The Street.</p> <p>⑤ As well as pollution, the volume of traffic, particularly lorries, has a massive impact on these historic row of cottages, now almost 200 years old - they shake and vibrate when lorries drive past. The main issue is</p>	<p>Five respondents noted the general volume of traffic along The Street, two specifically mentioning the rush hour traffic. This is the key factor and most difficult to effectively change. There are measures that could be investigated to spread the volume of traffic to prevent such a build-up during the rush hours or alternatively improving the flow of traffic by, for example, upgrading the Bunbury Arms junction. However, the only really effective method of reducing the traffic flow would be to divert the traffic. None of the current routes for diversion are suitable in their current state so the logical conclusion is that a bypass is required. Officers are aware that this is not realistically forthcoming, however, we will take this to the steering group to discuss further and agree preferred routes.</p>

	traffic queueing in rush hour - this is now daily (considerably worse than 3 years ago).	
Buildings being close to the roadside preventing dispersion of pollutants	<p>① Crossing in area of dense overhanging vegetation preventing dispersal of pollutants. ② In summer when trees are in full leaf the canopy over "The Street" must effect the dispersal of pollutants. ③ In your list of reasons for the air quality being problematic you include in item 'b.' buildings being close to the road preventing the dispersion of pollutants. In this respect (dispersion of pollutants), you have missed the fact that there are tall trees, opposite the village shop, that also provide a "wind shelter" that prevents the dispersion of pollutants. How you have missed this very obvious point is puzzling. Please take it into consideration when you formulate your proposals. Cutting down these trees should be the first point in any proposals</p>	Three respondents noted that the tree canopy would also likely prevent the dispersion of pollutants. We agree this is likely to be a factor, however, trees can also be beneficial in 'soaking up' pollutants, and provide significant amenity. Removing the trees would not provide any secondary benefits. We will take this forward to the steering group but Officers would not support removal of the trees.
The traffic flow being disturbed by the pedestrian	① Crossing in area of dense overhanging vegetation	Seven respondents made note of the crossing. In terms of air quality, the crossing is not ideally located, because westbound traffic accelerate (and thus cause greatest emissions)

crossing

preventing dispersal of pollutants. ② The pedestrian traffic lights are the next ③ School Children and parents ④ This is essential to avoid people (including children) having to "dodge" the traffic which will not stop for any pedestrians trying to cross the road. Before the traffic lights, we took our lives in to our hands trying to cross the road. ⑤ Traffic Lights are contributing to this, they need to be moved towards church institute. ⑥ The pedestrian crossing assists in reducing speeding traffic on "The Street". ⑦ The pedestrian crossing is essential. Many years ago a child was killed crossing the main road to the shop. With a large proportion of villagers living on the Conyers Green side of the village losing the pedestrian crossing will be an accident waiting to happen. Lots of the users of public transport, including many elderly, have to cross the road to get to the bus stop.

immediately adjacent to the area of concern, where there is no space for pollutants to disperse. Eastbound traffic would be stationary in the area of concern waiting for the green light. As two respondents note, the crossing is essential to allow people to cross the road and Officers would not support removing all crossings from Great Barton, as this is obviously a vital piece of infrastructure. However, we will take this to the steering group to investigate the possibility of moving the crossing or adding a further crossing to take some pressure off the existing crossing point.

The traffic flow being disturbed by traffic entering and exiting the School Road and East Barton Road junctions	<p>① traffic movements at the junction of The Street with School Lane and East Barton Road</p> <p>② Dangerous, yellow lines need extending</p> <p>③ The traffic does not have priority at all times</p> <p>④ Ticked</p> <p>⑤ The Yellow hatching at the junction of East Barton Road and The Street is practically invisible and frequently ignored.</p>	Five respondents noted the junction of East Barton Road / School Road with The Street. Detailed comments mainly related to the safety aspects of the junction. This will be taken forward to the steering group to discuss further.
Traffic building up and queueing through the problematic area from the Thurston (Bunbury Arms) junction during afternoon rush hour	Most prevalent factors are the density of traffic during peak hours	Two respondents specifically noted the rush hour traffic, however, this has been covered above under point a.
Cars parking outside the Post Office and disturbing traffic flow	<p>① To a much lesser extent, vehicles parking either outside of the post office or elsewhere.</p> <p>② ticked</p> <p>③ For several months the Post Office has only been opening in the morning and this has reduced the number of cars parking outside the PO.</p>	Three respondents noted parking outside the post office, with one noting that there has been a recent reduction in levels and another comment noting that this was much less of a factor than other factors. This will be taken forward to the steering group to discuss.
Bus Stop stopping flow of traffic	<p>① The affect occasionally of the bus stops disturbing the traffic flow</p> <p>② Two Bus shelters in area of question.</p> <p>③ There are also 2 bus stops</p>	Five respondents noted the proximity of the bus stops as being a potential issue. This will be taken forward to the steering group for discussion

	near. ④ Buses and school buses. ⑤ There are bus stops either side of The Street, near to the Post Office that affect the traffic flow.	
Proposed housing developments	<p>① Projecting forward the Orttewell bridge area will cause traffic build up into Bury when the NE development is underway and the Berkeley Transport study should factor this into their rationale.</p> <p>② In addition to the existing likely causes of the poor air quality there is a likelihood that the situation will be exacerbated by the currently proposed developments</p> <p>③ housing developments (Bekerley Homes/ The Triangle in Great Barton/Thurston) adding yet more.</p> <p>④ Inevitably the volume of traffic and therefore pollution will increase due to the various housing developments in and around Great Barton.</p>	This will be taken forward to the steering group to ensure that there is joined up thinking prior to any formal response being made by either air quality officers or transport officers once any formal application is received for additional housing developments.
Proximity of the School	The proximity of the school and the use of the immediate area by children and parents	It is understood that a number of parents currently park on East Barton Road and use this crossing to gain access to the school. Discouraging this practice would not only reduce the use of the pedestrian crossing and therefore allow for the flow of traffic to be disturbed less, it would also prevent the school children from being exposed to the pollutants in this area. This will be taken forward to the steering group for further discussion.
Road condition	① Loose drain lids, bumps in	The condition of the road and short term road improvement works will have little impact on

	roads, noise issues near crossing because of bump ② Disturbed traffic flow for maintenance of man hole cover opposite church road	the air quality in the long term, although we will pass these comments to the Highway Authority
East Barton Road	Has a number of elderly people and just walking to the P.O. you take your life in your hands. The corner of Cox Lane is waiting for an accident to happen. Leaves are a danger to young and old and should be swept up. Parking on the road is dangerous.	These issues are not directly related to the air quality problem and will be passed to the appropriate departments
Danger / Speeding	① Frequent non-adherence to speed limit ② Resident who puts life at risk walking on the pavement (like hard shoulder of M1). Daren't cycle on the road, can not use front garden because of noise and fumes. Would not allow children to walk to school. The traffic volume is such that it is dangerous to walk on the Street. If it was a railway line you would be prosecuted for endangering your life. ③ I fear it is only a matter of time until a lorry crashes into our house. Speed should be cut to 20mph. Erratic driving speeds (many people drive at	Five respondents specifically noted the dangerous nature of the A143 and the speed of traffic. This is also a matter Officers have noted during the course of the duties changing diffusion tubes on a monthly basis. Speeding traffic does not necessarily produce additional air pollution, however, we note that there are specific and significant concerns about the speed and nature of the traffic. We will look for any solution to be holistic in its nature and if we can help to reduce speeds or improve the safety then we will.

	<p>excessive speeds erratically).</p> <p>④ I would also like to highlight the danger caused by the high volume of HGV's travelling in excess of 30mph with school children walking along the path on the A143</p> <p>⑤ Vehicles regularly breach the 30mph speed limit on "The Street".</p>	
Mill Road	<p>It is not acceptable to suggest the diversion of traffic via the B1106 (Mill Road and Barton Bottom) to reduce traffic through the Street.</p>	<p>One respondent suggested that it was not appropriate to divert the traffic via the B1106. Officers agree with this comment.</p>
Bypass	<p>① The Cure of the problem has been obvious for the 50+ years I have used the village - until Great Barton gets a bypass the problem will only get worse!</p> <p>② Another very obvious point is that if there was a Great Barton bypass then your other problem areas would disappear i.e. a., c., d., and e.</p>	<p>This point is covered above when considering the general volume of traffic.</p>
West Suffolk Operational Hub	<p>The proposed WSOH (Hollow Road Farm) would dramatically increase traffic density</p>	<p>One respondent specifically made note of the WSOH. We have considered this matter at length. The proposals for the WSOH are unlikely to affect the density of traffic in Great Barton. Bin lorries or operational vehicles servicing villages to the NE of Great Barton (e.g. Stanton and Ixworth) are currently based at Olding Road in Bury St Edmunds and have to travel through Great Barton via the A143 to reach these villages, this will be unchanged by the proposed move to Hollow Road Farm or any other location in Bury St Edmunds. Moving the depot/transfer station will not create any additional refuse collections in the villages to</p>

		the NE of Great Barton and so the number of movements are unlikely to be affected. Lorries transporting waste to the EFW facility at Great Blakenham will travel directly from Hollow Road to the A14 and will not therefore go via Great Barton. Traffic accessing the proposed HWRC at Hollow Road Farm is again predominantly not new traffic, but traffic that was previously accessing the Rougham Hill site. It is likely that traffic accessing the Hollow Road Farm site that has to travel through Great Barton, would have previously travelled through Great Barton to reach Rougham Hill. There may be some exceptions to this, but these will not be a significant percentage or volume of traffic. We appreciate that there are some concerns regarding 'rat-running' through the village to reach the Hollow Road Farm site, however this will not have a negative impact on the small area of particular air quality concern, which is located on the main road (A143).
Other Comments	Dustbin lorries doing their rounds. Many emergency vehicles. Given the number of elderly residents living in Oakhampton House and Montana, air quality is an important issue.	

Table A.2 – Summary of Responses to Consultation and Stakeholder Engagement on the AQAP

Consultee	Category	Response
*		

*Consultation yet to take place.

Appendix B: Reasons for Not Pursuing Action Plan Measures

Table B.1 – Action Plan Measures Not Pursued and the Reasons for that Decision

Action category	Action description	Reason action is not being pursued (including Stakeholder views)
Traffic Management	Great Barton Bypass	A Great Barton bypass would be a multi-million pound project and no funding source is currently available.
Traffic Management	Amendments to School Road to make one way traffic	<p>Considered not currently feasible as making School Road one-way would require vehicles to make a right turn at the northern end of School Road, which is not a movement that is encouraged due to poor visibility. The northern end of School Road is designed to encourage a left turn only. To enable a fully safe right turn at the northern end of School Road Highway Engineers have confirmed this would require purchase of private land and engineering works. The cost of this project could therefore be significant. The purchase of land would require compulsory purchase orders the legal requirements of which are unlikely to be met unless it can be proved that there are no other feasible options.</p> <p>Our assessment has concluded that this solution would also add significantly to overall carbon emissions as it would add over a mile to each journey for traffic heading towards Bury St Edmunds. It is also noted that traffic heading towards Bury St Edmunds would still end up travelling through the AQMA (assuming they didn't rat run), albeit likely to be at a more steady speed and therefore producing slightly lower emissions than if they had exited School Road from the southern end and gone directly through the AQMA. Air quality benefits are therefore likely to be limited.</p>

Glossary of Terms

Abbreviation	Description
AQAP	Air Quality Action Plan - A detailed description of measures, outcomes, achievement dates and implementation methods, showing how the local authority intends to achieve air quality limit values'
AQMA	Air Quality Management Area – An area where air pollutant concentrations exceed / are likely to exceed the relevant air quality objectives. AQMAs are declared for specific pollutants and objectives
AQS	Air Quality Strategy
ASR	Air quality Annual Status Report
Defra	Department for Environment, Food and Rural Affairs
EU	European Union
LAQM	Local Air Quality Management
NO ₂	Nitrogen Dioxide
NO _x	Nitrogen Oxides
PM ₁₀	Airborne particulate matter with an aerodynamic diameter of 10µm (micrometres or microns) or less
PM _{2.5}	Airborne particulate matter with an aerodynamic diameter of 2.5µm or less

Licensing and Regulatory Committee



Title of Report:	West Suffolk Food Safety Service Plan 2018-2019	
Report No:	LIC/SE/18/005	
Report to and date:	Licensing and Regulatory Committee	3 July 2018
Portfolio holder:	Councillor Alaric Pugh Portfolio Holder for Planning and Growth Tel: 07930 460899 Email: Alaric.pugh@stedsbcc.gov.uk	
Lead officer:	Richard Smith Team Leader (Commercial Environmental Health) Tel: 01284 757626 Email: richard.smith@westsuffolk.gov.uk	
Purpose of report:	To consider and support the delivery of a West Suffolk Food Safety Service Plan for West Suffolk, required under the Food Law Code of Practice 2017.	
Recommendation:	Licensing and Regulatory Committee: The Committee is requested to <u>note</u> the contents of the report and support the delivery of the Food Safety Service Plan.	
Key Decision:	<i>Is this a Key Decision and, if so, under which definition?</i> No, it is not a Key Decision - <input checked="" type="checkbox"/>	

Consultation:	<ul style="list-style-type: none"> • The Food Law Code of Practice does not require regulatory authorities to consult on plans required under the Code of Practice. • Open-ended dialogue with stakeholders is being undertaken as part of service delivery with a focus on the Food Safety Service Plan. • Informal consultations have been undertaken with stakeholders and other regulatory authorities throughout the last 12 months regarding the proposed implementation of charging for FHRS re-rating, to ensure consistency of approach.
Alternative option(s):	<ul style="list-style-type: none"> • Modify the form of the Plan – This would leave the West Suffolk councils open to regulatory challenge by the Food Standards Agency since the format is based on their guidance.
Implications:	
Are there any financial implications? If yes, please give details	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> <ul style="list-style-type: none"> • Minor financial benefit to West Suffolk Councils • Minor financial cost to businesses for FHRS re-rating •
Are there any staffing implications? If yes, please give details	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> <ul style="list-style-type: none"> •
Are there any ICT implications? If yes, please give details	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> <ul style="list-style-type: none"> •
Are there any legal and/or policy implications? If yes, please give details	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> <ul style="list-style-type: none"> • It is a requirement of the 2017 Food Law Code of Practice that regulatory authorities prepare, adopt and review a Food Safety Service Plan for their area. • The intention to offer of fast-tracked Food Hygiene Rating Scheme re-rating inspections on a charged basis in line with other local authorities.
Are there any equality implications? If yes, please give details	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> <ul style="list-style-type: none"> •
Risk/opportunity assessment:	(potential hazards or opportunities affecting corporate, service or project objectives)

Risk area	Inherent level of risk (before controls)	Controls	Residual risk (after controls)
Statutory Responsibilities	Medium	Delivering the statutory responsibilities will help reduce the inherent level of risk of challenge by stakeholders	Low
Reputational	Medium	The Council's work will help achieve a creditable pathway to protecting human health and improving food hygiene standards.	Low
Financial	Low	The service is delivered within the 2018/19 council budget provision. Some minor additional income generation through FHRS re-rating.	Low
Community	High	Delivering a food hygiene service in accordance with the Food Safety Service Plan will help protect public health.	Low
Ward(s) affected:		All Wards	
Background papers: <i>(all background papers are to be published on the website and a link included)</i>		Link to 2017 Food Law Code of Practice (England) available at: https://www.food.gov.uk/other/food-and-feed-codes-of-practice Link to FSA Framework Agreement on Local Authority Food Law Enforcement available at: https://www.food.gov.uk/about-us/local-authorities	
Documents attached:		Appendix A – Food Safety Service Plan 2018-2019	

1. Key issues and reasons for recommendation(s)

1.1 The Food Law Code of Practice (England) 2017

- 1.1.1 Through its Food Law Code of Practice, the Food Standards Agency requires each regulatory authority to prepare, adopt and regularly review a Food Safety Service Plan (**Appendix A**). This report presents a West Suffolk Food Safety Service Plan that covers both the regulatory and support work undertaken by the Environmental Health Service to protect public health in West Suffolk in respect of the food chain, whether working in food business or are a food consumer.
- 1.1.2 The Code of Practice does not prescribe a format for the plan; however, local authorities have adopted a standard template on which this plan is based. The plan includes elements of review of the year just ended as well as setting out the work for the coming year. The Code also states that, although not a requirement, endorsement of the plan by elected members is considered good practice.

1.2 Stakeholder consultation

- 1.2.1 The Code does not require local authorities, nor have officers identified it as common practice in other local authority areas, to consult with stakeholders on their plan prior to adoption by the respective Council. Officers feel it important, however, that the Council continues to build on its ongoing dialogue with both local food businesses and their customers to ensure that we meet their needs, improve the understanding of the various roles of stakeholders in food safety and also to help improve our services. To do this, officers have put in place a food safety communications plan.
- 1.2.2 Given the Food Safety Service Plan is an operational document, it will undergo regular review and change in future years. Officers, therefore, will continue to maintain and enhance dialogue with stakeholders which will help inform any revision to the plan as well as helping to improve the services that the council delivers.

1.3 The Introduction of fast-tracked Food Hygiene Rating Scheme (FHRS) re-rating on a chargeable basis

- 1.3.1 The Service Plan sets out the introduction of a fast-track re-rating inspection under the Food Hygiene Rating Scheme. Currently, following a food inspector down-rating a business because of poor performance during a programmed inspection a standstill period of 90 days applies during which time the business is supported by your officers to make improvements. The inspector has not been allowed by FSA rules to re-rate until that standstill period has expired. This creates reputational worries for the business who in turn may apply unreasonable demands on the service leading to at times pressure on long-standing working relationships. Annually, of the 750 programmed inspections we undertake around 20-30, or 4%, result in down-rating.
- 1.3.2 As with other local authorities across England, under FSA changes we can now provide a fast track re-rating service which is discretionary and above

and beyond our statutory inspection services. Given that the Food Hygiene Rating Scheme as a whole falls within the general power of the Localism Act 2011 FSA guidance advocates a charge being applied to access this service.

- 1.3.3 The proposed charge will only apply to re-rating inspections and not when we conduct an official control revisit to check on essential work / improvements or programmed inspections required to comply with the law.
- 1.3.4 The introduction of charging for FHRS re-rating visits can significantly benefit businesses by removing the 3-month standstill period following an inspection if the issues identified relate to procedural or management matters. The introduction of the charges would enable businesses to apply for re-rating at any time following a routine inspection although inspectors set the date for the inspection based on promptness and practicality.
- 1.3.5 This could enable businesses to avoid any negative publicity that may arise from a poor rating being given, which could impact business profitability. Officers have spoken to many of the local businesses that we regulate as part of day-to-day work and there appears to be general support for a charged service in particular from smaller business where the reputational impact is higher given the impact of disruption on trade. It is anticipated that there will be an added benefit to consumers within West Suffolk, in that businesses should seek to rectify contraventions and issues quickly to secure a better rating, improving the safety and quality of food to their consumers.
- 1.3.6 Some businesses may perceive that the charge entitles them to 'buy more stars' within the rating system. This is not the case. Clear information will be available and provided to businesses to explain that the charge is for a full inspection and re-rating of their food business, which will be scored against the same criteria, following the same guidance, as the initial inspection. Businesses will be advised that their FHRS rating could drop if improvements have not been made or additional contraventions are identified.
- 1.3.7 At this time, no announcement has been made about when mandatory display of FHRS ratings will be introduced; however this could significantly increase the number of businesses who may opt for a fast-tracked visit. Should the FSA decide to introduce mandatory display of scores, the service will review and adapt accordingly.

2. Additional supporting information (if required)

- 2.1 The work of the Commercial Environmental Health Team, as the designated Food Safety service, contributes to the following corporate priorities:

Priority 1: Growth in West Suffolk's economy for the benefit of all our residents and UK plc. The plan ensures that the council's regulatory approach is fair and transparent with regard to regulated businesses in West Suffolk. Further, it actively encourages and supports good businesses to grow by regulating in a proportionate manner and rewarding good practice through such initiatives as Eat Out Eat Well.

Priority 2: Resilient families and communities that are healthy and active

The work of the Service as set out in the plan is undertaken to protect the health of the public by ensuring effective regulation of the food chain to the benefit of consumers.

- 2.2 The proposed plans are in line with the 2018-2019 budget identified for this Council function.
- 2.3 The service plan has been drafted in accordance with the Food Standards Agency framework agreement and the Regulator's Code¹ and fulfils local authority obligations under guidance issued by the FSA.

1

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/300126/14-705-regulators-code.pdf

Appendix A

West Suffolk Food Safety Service Plan 2018/19

Preface

The Food Standard Agency (FSA) Framework Agreement sets out what the FSA expects from local authorities in their delivery of official controls on food law including within service plans.

The Food Law Code of Practice states that each Competent Authority must have an up-to-date, documented Food Service Plan which is readily available to food business operators and consumers. The Plan must be subject to regular review and clearly state the period of time during which the Plan has effect.

The Plan must cover all areas of food law that the Competent Authority has a duty to enforce and set out how the authority intends to deliver Official Controls within its area. The Plan must include imported food responsibilities and the control arrangements in place. The Plan must include reference to the authority's approach to enforcement including its Alternative Enforcement Strategy for dealing with those premises rated as low risk under the Food Establishment Intervention Rating Scheme set.

Working together, Forest Heath District Council and St Edmundsbury Borough Council have developed this document with due regard to all available regulations, conditions, codes of practice, statutory guidance and practical experience of legislation. Should anything in future publications, legislative/regulatory changes or case law impact upon the content of this service plan document, then it will be taken into account and the document may be updated at a later stage and with due consideration to the resource implications for the Regulating Food Authority.

Since 2011, the West Suffolk councils have adopted a single delivery approach whilst retaining political sovereignty. In May 2018, following an application to Government, an Order to dissolve St Edmundsbury Borough Council and Forest Heath District Council and create a new West Suffolk Council was approved by Parliament. It is anticipated that the new West Suffolk Council will become an official legal entity on 1 April 2019.

A new West Suffolk Council will not fundamentally alter the way the food team operates, which are bound by the requirements of the Food Standards Agency's Framework Agreement and the Food Law Code of Practice, with the shared services programme having matured during operation over the previous 7 years.

Throughout this service plan the term "West Suffolk councils" and "The Team" should be read as jointly applying to both Councils' and their Food Authority function. Where the Statement applies to only one of the Councils, it will be stated which one.

This Food Safety Service Plan is meant to be read in conjunction with the Planning and Regulatory Services Business Plan for 2018/19, an extract of which is presented at Appendix 1.

For further information please refer to:

www.food.gov.uk

www.westsuffolk.gov.uk

If you require this information in another format or language, please phone 01284 757400 or email food&safety@westsuffolk.gov.uk to discuss your need.

1.0 VISION, PURPOSE, AIMS AND OBJECTIVES

1.1 Service Vision and Purpose

To protect public health and safety and the environment, by carrying out programmed and reactive interventions, investigations and research to detect, eliminate and/or control hazards by applying fair, transparent and proportionate enforcement.

1.2 Range of functions and activities

The Food Safety function is delivered by the Commercial Environmental Health Team, located within the Environmental Health Service in the Planning and Regulatory Services Directorate.

The range of food safety functions undertaken by the Commercial Environmental Health Team are varied and include the following:

- Programmed interventions/inspections and revisits in food premises for which the West Suffolk councils are the enforcing authority;
- Investigation of complaints concerning food, the full range of food establishments, and food handling practices;
- Providing food safety advice and support to new and existing food business operators, including help by promoting the Food Standards Agency's "Safer Food, Better Business" food safety management system;
- Food sampling in accordance with the programme prepared by the Public Health England and the Eastern Region Food Sampling Group;
- Investigation of suspected and confirmed food poisoning cases and outbreaks, and other notified infectious disease cases;
- Action in respect of Food Alerts issued by Food Standards Agency;
- Acting as "Originating Authority" to food manufacturers and producers within West Suffolk and issuing Health Certificates for those who export foodstuffs;
- Ensuring the removal of unfit food from the food chain by seizure, detention or voluntary surrender;
- Consultees for food safety guidance and policies, planning applications, etc.;
- Food Safety Promotional and Educational Campaigns;
- Health Development in areas related to the functions above, e.g. participation in the Eat Out Eat Well award scheme;
- Checks on inland imported food control at retail, catering and other establishments;
- Registration of all food establishments, including Approvals where appropriate.

1.3 Customers

Our customers are varied; however they mainly include the following:

- All members of the public residing in or visiting West Suffolk;

- Food establishments for which we are the responsible enforcing food authority;
- Public Health England;
- Food Standards Agency;
- Local Authorities;
- Trading Standards;
- Port Health;
- Internal Services.

1.4 Aims and Objectives

Within the broader work covered by the Planning and Regulatory Services Business Plan 2018-19, the West Suffolk councils have responsibilities as Food Authorities.

Our aims are:

- To work with businesses and consumers to promote and secure high standards of food safety, and minimise risks to the health of residents and visitors, by ensuring that all food processes, premises and food handlers within West Suffolk maintain good levels of hygiene
- To seek to continually improve health, safety and welfare standards and to reduce health inequalities of all individuals working in and visiting places of work within the district
- To protect public health and safety by carrying out targeted inspections (interventions), enquiries, investigations and research to detect, eliminate and/or control hazards by applying fair, proportionate and transparent enforcement
- To help businesses through smarter ways of regulation to reduce the burden so that they can make a beneficial contribution to the local economy.

These aims are supported by a number of objectives:

1. Carry out an annual planned programme of food hygiene inspections in accordance with Food Standards Agency framework guidance, codes of practice and relevant statutory requirements.
2. Investigate food and food premises complaints and take appropriate action in accordance with our service standards, procedures and national guidance.
3. Inform businesses of their legal obligations under relevant legislation.
4. Carry out routine microbiological sampling in accordance with national guidance and participate in local, regional and nationally coordinated surveys.

5. Investigate and monitor reports of infections and notifiable diseases in partnership with Public Health England.
6. Respond to food alerts issued by the Food Standards Agency in accordance with local and national guidance.
7. Act as originating authority for certain food businesses and investigate or respond to any enquiries made by other authorities or agencies.
8. Provide advice, assistance, training and development opportunities to both businesses and consumers. Help businesses improve their standards by promoting best practice, self-regulation and enhancing the competence skills of employees.
9. Promote food safety and, where appropriate, participate in local and national campaigns.
10. Provide appropriate training and development opportunities for staff to ensure an appropriate level of competence.
11. Work in partnership with other agencies to help secure and promote good food hygiene.
12. Ensure the work of the Service accords with the West Suffolk councils' policies.

1.5 Links to the Strategic Plan

West Suffolk's Strategic Plan sets out what the councils aim to achieve, with our partners, local businesses, communities and residents. This means focusing our efforts and resources in the areas that are the biggest priorities for West Suffolk.

Our strategic priorities are:

- Increased opportunities for economic growth;
- Resilient families and communities that are healthy and active;
- Homes for our communities.

We review our Strategic Plan regularly in order to ensure that it remains relevant and is kept up to date. Progress towards delivery of our Strategic Plan is set out in the West Suffolk annual report.

More information on the Strategic Plan can be found on our website:

http://www.westsuffolk.gov.uk/Council/Policies_Strategies_and_Plans/strategic_plan.cfm

1.6 Enforcement Policy

The councils currently have separate written enforcement policies. Work is in progress to refresh the West Suffolk Enforcement Policy, providing a framework for all of our regulatory services, including the food safety service.

The refreshed policy will reflect changes brought about by the Regulators' Code which establishes how non-economic regulators should interact with those they are regulating. The Code requires regulators to:

- Carry out their activities in a transparent way that helps those they regulate to comply and grow;
- Design simple and straightforward ways to engage with and hear the views of those they regulate;
- Base their regulatory activities on risk and share information about compliance and risk; and
- Ensure clear information, guidance and advice is available to help those they regulate meet their responsibilities.

Officers, including those with responsibility for the enforcement of food and health and safety laws, have regard to the Enforcement Policy when making enforcement decisions.

2.0 **SERVICE DELIVERY**

2.1 Demands on the Food Safety Service

There are 1,880 food establishments registered/approved under food safety legislation in West Suffolk. A profile of registered/approved food establishments classified in accordance with the Food Standard Agency's main use codes is given in Table 1.

Table 1 - Profiles of registered/approved food establishments in Forest Heath and St Edmundsbury. Source: M3 database 11/04/2018 (2017 figures)

FSA Category	Number of establishments
Primary producers	39 (43)
Manufactures/Processors	65 (78)
Packers	4 (0)
Importers/Exporters	4 (4)
Distributors/Transporters	60 (55)
Retailers	374 (357)
Restaurants and Caterers	1334 (1327)
TOTAL	1880 (1864)

The number of food establishments approved/conditionally approved under EU Regulation 853/2004 is:

Forest Heath: 7 (2017 = 7)
St Edmundsbury: 7 (2017 = 7)

Source: M3 database 11/04/2018

The West Suffolk councils have approved establishments that produce meat, fish, dairy and egg products.

West Suffolk attracts many tourists and visitors due to the range of things to do, from outdoor family fun and historical events to live music. Events and activities such as the Bury St Edmunds Christmas Fayre, Newmarket Races, and Forest Live see the Team working with event organisers and others during the planning and delivery of their events to ensure that the food stored, prepared and served is safe to eat and complies with food safety laws.

The Team perform out-of-hours inspections where this is necessary, e.g. some large outdoor events and Sunday/farmers' markets. Some food businesses that are open for business at night, at weekends or in the early hours of the morning, are identified for occasional inspection at these times.

There are a large number of food businesses associated with and/or operated by the ethnic minorities within West Suffolk - including Chinese/Cantonese, South Asian, Turkish, Greek, Thai, Portuguese and Polish. The majority of food businesses run by these groups are takeaways, restaurants and retail shops. The Team makes use of translated information made freely available by the FSA, e.g. advisory leaflets. Additional translation services may be used where there is a legal requirement to do so, where it is necessary to help ensure that Food Business Operators understand where action needs to be taken to protect against serious risk to public health, or to assist in efficient and effective service delivery. These additional translation services are rarely needed as part of our routine work.

Correspondence with food business operators or customers known to have a poor understanding of English may be provided in appropriate languages/alphabets advising the recipient of the legal importance of the letter and the need to obtain a full translation.

Several food businesses cater specifically for people who are vulnerable e.g. as a result of age or disability. This is taken into account by appropriate risk scoring criteria used in the risk rating of such premises to determine intervention and inspection frequencies.

2.2 Interventions at Food Establishments

The Team aims to ensure that food in the West Suffolk area is fit for human consumption, and that outbreaks of food poisoning and other infectious diseases are controlled. To achieve this, inspections and interventions at food establishments are carried out using a risk-based approach, in accordance with the Food Law Code of Practice. Specialist computer software is used to record all food business establishments. These records are kept up to date and are used to administer the programme of risk-based inspections and other interventions.

The Food Law Code of Practice requires that all food establishments should receive an initial inspection. This should normally take place within 28 days of registration or from when the Authority becomes aware that the establishment is in operation. This reflects the importance of ensuring new food establishments are complying with food law.

Food establishments are risk-rated using criteria set out in the Food Law

Code of Practice. Establishments receive a risk rating according to:

- the nature of their business, e.g. the risk associated with the type of food handled, processing methods, number and vulnerability of customers; and
- the standard of food safety achieved, i.e. compliance with food safety law.

Establishments may be rated as higher risk either because of the high-risk nature of the food and processing methods at their business, because of the low standards of food safety, or a combination of both. Establishments receive a risk rating ranging from A (highest risk) to E (lowest risk). Unrated establishments include new businesses that are waiting for an inspection to be carried out. Some establishments are outside the risk-based intervention and inspection programme, such as primary producers.

Profiles of the food establishments by risk are shown below in table 2.

Table 2 - Profiles of food establishments according to risk. Source: M3 database 11/4/2018 (2017)

Risk Category and number of food establishments in each category					
A	B	C	D	E	Unrated*
8 (7)	41 (38)	234 (238)	647 (648)	690 (708)	260 (230)

*The "Unrated" category consists of either new premises awaiting inspection, outside the inspection programme, or premises requiring database recoding e.g. as a non-food premises.

The minimum intervention frequency as required by the Food Law Code of Practice, and the estimated time per intervention for each risk category, are set out below in table 3.

It should be noted that all estimated times in the following sections are based on our previous experience.

The range of available interventions for food establishments includes inspections, monitoring, surveillance, verification, audit, sampling, education, advice, coaching, information and intelligence gathering. The regulatory burden is minimised by selecting the most appropriate intervention for the risk category of the establishment. Alternative enforcement strategies include the use of questionnaires for lower risk category E food business establishments.

Table 3 – Food Law Code of Practice minimum intervention frequency and locally estimated time per intervention for each risk category.

Category	Minimum intervention frequency	Estimated time per intervention (hours)
A	6 months	6
B	12 months	6
C	18 months	5

D	24 months	3
E	Alternative enforcement every 3	2
Unrated / Uncategorised	-	2

The numbers of food interventions due (including outstanding) for 2018/19 by risk category are shown in Table 4.

Table 4 - Number of food interventions due, including outstanding 2018/19 (2017/18). Source: M3 database 11/04/2018 (2017)

Risk Category	Number Due 2018/19	Estimated Time to complete (Hours)
A	8 (6-monthly inspection) (7 (6-monthly inspection))	96 (84)
B	42 (35)	252 (210)
C	151 (161)	755 (805)
D	290 (394)	870 (1182)
E	375 (422)	750 (844)
Uncategorised	22 (18)	44 (36)
TOTAL	888 (1037)	2767 (3161)

The food interventions at lower-risk premises that were not completed in 2017/18 will be carried forward into 2018/19 and are shown below in table 5.

Table 5 - Number of food interventions being carried forward into 2018/19 (2017/18) Nb. Figures included in Table 4 above. Source: M3 database 11/04/2018 (2017)

Risk Category	Outstanding	Estimated Time to complete (Hours)
A	0 (0)	Included in Table 5
B	0 (0)	
C	0 (13)	
D	67 (90)	
E	187 (191)	
Uncategorised	12 (9)	
TOTAL	266 (303)	

Missed lower-risk inspections, arising as a result of access issues such as infrequent and erratic trading or because the team resources were focused on higher-risk premises during a recent period of staff shortages, will continue to be picked up during 2018/19. Work to clear the outstanding lower-risk inspections is being carried out in close liaison with the Food Standards Agency's Regulatory Delivery Assurance Team as part of their standard review of local authority intervention activity.

Interventions are undertaken following documented procedures. The date of a primary inspection may be brought forward, e.g. in response to a complaint,

a new food registration, a material change in the business, receipt of information from the FSA, an outbreak, or being a seasonal business that may be closed at the time of the next date due. Other reactive interventions are carried out at other times, e.g. in response to customer complaints, alleged cases of food poisoning, food hazard warnings, sampling, revisits and requests for advice.

Most food businesses that supply food direct to the public receive a rating under the Food Hygiene Rating Scheme (FHRS). These ratings range from **0** (urgent improvement necessary) to **5** (very good). Businesses that receive a rating of 0, 1 or 2 have a poor level of compliance with food safety and hygiene law.

Businesses that are broadly compliant with food safety and hygiene law will receive at least a rating of **3** (satisfactory), and on 31 March 2018 over 97% in West Suffolk were rated **3-5**. Businesses that have a good level of compliance with food safety law will receive the top rating of **5**.

Interventions will be undertaken more frequently for poorly compliant businesses as their risk-rating is reviewed. These interventions aim to achieve better and sustained compliance rates at poorly compliant food businesses. Revisits of poorly compliant businesses due in 2018/19 will be carried out as necessary.

Changes to the Food Law Code of Practice in 2017 have enabled local authorities to offer fast-tracked visits at the request of the business for FHRS re-ratings on a chargeable basis. The introduction of fast-tracked visits benefit businesses by removing the initial 3-month standstill period prior to a current FHRS re-rating visit. In addition, there will be no limitation in the number of re-rating requests from a business, which is currently limited to only one FHRS re-rating visit following a routine inspection.

Other Suffolk local authorities charge for FHRS re-ratings; our decision to delay introduction has been in order to allow sufficient experience of other local authorities to inform how we apply charging locally.

To ensure consistency with the other Suffolk local authorities, ensuring fairness and business equality across Suffolk businesses, and to provide businesses with improved opportunities for FHRS re-ratings, a charge is to be introduced for FHRS re-ratings in West Suffolk. The charge will be set at £110 per re-rating visit, consistent with other Suffolk authorities, and will apply to all requests for a FHRS re-rating. Uptake will be monitored with future pricing reviewed periodically based on experience.

For information:

Proposed for West Suffolk	£110
Waveney/Suffolk Coastal	£115
Babergh/Mid Suffolk	£100
Ipswich	£120

The charge of £110 for West Suffolk was chosen as the median of our peer authorities in Suffolk.

Other national charges of note, from data supplied by London Borough of Hackney benchmarking exercise:

Borough of Poole	£71 (lowest in UK)
London Borough of Wandsworth	£206 (highest in UK)
UK average	£156.90.

Research, using data from other Suffolk authorities, indicate that there will be a slight increase in the number of re-rating requests following the introduction of the charges. Our own experience over the last two years is that out of around 750 businesses inspected each year, between 20 and 30 businesses (4%) request a re-rating. A proportion of these could choose to opt for a fast-track re-rating inspection.

At this time, no announcement has been made about when mandatory display of FHRS ratings will be introduced, however this could significantly increase the number of businesses who may opt for a fast-tracked visit. This would impact on the staff resources currently available within the Team and will be reviewed accordingly.

Any fast-tracked re-rating visit will be carried out in accordance with the FHRS Brand Standard and the CEH team work procedures which are being revised to accommodate this change.

The Team have worked closely and successfully with several businesses to actively promote improved ratings following interventions at those businesses, through the use of media and social media.

The Trading Standards Department of Suffolk County Council has responsibility for food standards matters. Liaison arrangements are in place through the Suffolk Food Liaison Group to develop joint work plans and to help ensure that matters of joint interest, such as food labelling, imported food, BSE controls, animal by-products, avian influenza and genetically modified foods are discussed. Joint visits with Trading Standards Officers are made where appropriate. Copies of all food registrations received are forwarded to Suffolk County Council's Trading Standards Department.

2.3 Food hygiene practices/hygiene of premises complaints

Officers investigate food complaints in accordance with documented procedures and, where necessary, liaise with Primary, Originating and Home Authorities during the course of investigations. In determining an appropriate course of action, the Team take into consideration any reports received from the Primary, Home or Originating Authorities, and the food business identified as the cause of the complaint, and will have regard to the Councils' Enforcement Policy.

Table 6 - Food Hygiene Complaints 2017/18 (2016/17). Source: M3 database 11/04/2018 (2017)

2.4

Food Sampling Policy Complaint Type	Number	Estimated Time per Task	Estimated Time to complete (Hours)
Unsatisfactory Practices	53 (44)	6	318 (264)
Unsatisfactory Premises	24 (38)	6	144 (228)
Food Complaint (Biological)	1 (2)	6	6 (12)
Food Complaint (Foreign Body)	14 (14)	6	84 (84)
Food Complaint (Labelling)	2 (0)	5	10 (0)
Food Complaint (Other)	60 (76)	5	300 (380)
Food Complaint (Chemical)	1 (1)	4	4 (4)
Food Complaint (Undercooked)	5 (9)	6	30 (54)
Total	160 (184)		896 (1026)

Microbiological food sampling makes an important contribution in protecting the general public and discharging the Councils responsibility in food law enforcement. Microbiological food sampling is used as part of a planned approach to gather information about the microbiological quality, and possible presence of harmful microorganisms, in particular foods which are produced and/or sold locally. Based on this information appropriate action can be taken to protect the consumers.

The councils are committed to providing the resources necessary to carry out a sampling programme. Environmental Health Officers are responsible for undertaking the food sampling functions. The councils have a food sampling programme for microbiological purposes. The food sampling is prioritised to concentrate upon one or more of the following criteria:

- foods which are produced within the Councils' districts;
- the risk ratings of the premises; and
- any local, regional or national coordinated sampling surveys or programmes.

The majority of food samples, including hygiene swabs, are taken informally, for the purpose of monitoring, surveillance and intelligence gathering. Formal samples will be taken where enforcement action is anticipated and these samples will be taken in full compliance with the legislation, relevant Code of Practice and consideration of the Councils' Compliance and Enforcement Policy.

Official laboratories as designated by the FSA will be used for samples obtained during the sampling programme. The designated laboratory is the Public Health England Laboratory at Collindale, London. Other samples will be sent to the Council's Public Analyst, Public Analyst Scientific Services Limited.

Samples are recorded using the Northgate M3 database. The FSA's UK Food Surveillance system (UKFSS) has now been decommissioned by the FSA due to performance issues, an alternative is likely to be introduced in the next few years.

Samples may be taken during manufacturing/production processes for the purposes of ensuring food safety and establishing the effectiveness of the critical controls in the process. The manufacturer will be notified of the result of any such sample analysis or examination.

The councils do not currently act as a Home Authority or Primary Authority for any food business. Where sampling identifies a problem with food manufactured outside the districts, the relevant primary, home or originating authority will be notified and a copy of the certificate of analysis or examination will be forwarded to them.

Food sampling will not normally be undertaken as a constituent part of food safety inspections. It may take place if, during the inspection, the authorised officer identifies a particular problem that needs further investigation.

Samples of food received as a food complaint may require microbiological examination, chemical analysis or expert identification.

Where a particular premises or food produced in the districts is implicated with a case, or cases, of foodborne disease, food samples may be taken and submitted for examination, for the purpose of identifying any likely source of infection, and controlling any risk to public health. These samples are likely to be formally taken and examined.

Food samples may be taken and submitted as part of a special investigation, e.g. in response to a food hazard warning or other intelligence received about potential food safety and quality issues.

Table 7 - Food Samples 2017/18 (2016/17) against anticipated in 2018/19. Source: M3 database 11/04/2018 (2017)

	Number of Samples	Estimated Time Per Sample (Hrs)	Total Time (Hrs)
Actual 2017/18 (2016/17)	132 (42)	2.5	330 (105)
Anticipated 2018/19	150	2.5	375

2.5 Control and Investigation of Outbreaks and Food Related Infectious Disease

The Team will assess and respond accordingly to reports of communicable diseases, including food-associated illness. The investigation of outbreaks of food poisoning is conducted in liaison with the Consultant in Communicable Disease Control (CCDC), having regard to the Norfolk, Suffolk and

Cambridgeshire Joint Communicable Disease Incident/Outbreak Management Plan. Information relating to certain infections will be collected as a matter of urgency and passed to the Anglia Health Protection Team, Public Health England, in accordance with the East of England Standard Approach to Investigating Gastro-Intestinal Disease Cases.

The Team response to a report of communicable disease, including food-associated illness, is undertaken following documented procedures.

Table 8 - Gastrointestinal disease cases notifications 2017/18 (2016/17) against anticipated in 2018/19. Source: M3 database 11/04/2018 (2017)

	Number of Reported Cases (Individuals)	Time Per Case (average)	Total Time (Hrs)
Actual 2017/18 (2016/17)	93 (145)	2	186 (290)
Anticipated 2018/19	100	2	200

Joint civil contingency and emergency stand-by arrangements exist to respond to suspected or confirmed outbreaks of infectious disease or food poisoning with either the potential to cause serious harm or death to any person, or debilitating illness or disease to significant numbers of people, or illness or disease to particularly vulnerable populations.

2.6 Food Safety Incidents

Arrangements are in place to receive FSA Food Alerts for Action and take specified action on behalf of consumers.

During 2017/18, 78 food alerts were notified by the FSA. Very few of these required formal action, i.e. dedicated visits to local food establishments. All food alerts are logged and recorded on our specialist database.

Table 9 - Food Alerts Requiring Action 2017/18 (2016/17) against anticipated in 2018/19. Source: M3 database 11/04/2018 (2017)

	Number of Alerts requiring local action	Time Per Case (average)	Total Time (Hrs)
Actual 2017/2018 (2016/17)	0 (3)	4	0 (12)
Anticipated 2018/2019	2	4	8

2.7 Primary Authority and Home Authority Schemes

The Regulatory Enforcement and Sanctions Act 2008 introduced into law the principle of the Primary Authority (PA). All local authorities are required, by law, when considering enforcement action against a business with multiple outlets, to follow advice agreed between the business and its PA. The purpose of these requirements is to achieve greater consistency in enforcement action in large, multi-outlet businesses.

The Team supports the PA and Home Authority (HA) schemes. Where PA partnerships are registered with the Regulatory Delivery (formerly the BRDO), an officer will contact the PA to ensure that proposed actions are not contrary to appropriate advice that the PA has previously issued.

2.8 Advice to Business

The Team actively support businesses to help them grow and become a success. The Team provides advice to businesses, for example:

- the promotion of information guidance notes to assist businesses comply with the law and good food hygiene practices;
- directing enquiries to relevant sources of competent and reliable advice, e.g. FSA website;
- distribution of FSA and other guidance to businesses relating to specific and topical issues;
- provision of advice to businesses during and following inspections;
- mailshots;
- through the West Suffolk Environmental Health Facebook page; and
- responding to requests for advice from businesses and members of the public.

Table 10 - Requests for Advice 2017/18 against anticipated in 2018/19. Source: M3 database 11/04/2018 (2017)

	Number	Time Per Case (average)	Total Time (Hrs)
Actual 2017/2018 (2016/17)	212 (248)	4.5	954 (1116)
Anticipated 2018/2019	250	4.5	1125

Many of these enquiries and advice requests take time for the officers to research and compile the advice, often very specialised, with some requiring visits to the premises.

The Team takes all such opportunities to engage with businesses, e.g. when a food registration form is received, etc. to provide advice by telephone or by visits to the premises. The advice visits enable businesses to commence their operations in a safe manner and in compliance with regulations, with appropriate signposting to other departments for further guidance relating to licensing, planning, building control, available grant funding, etc. This proactive support enables the business to receive the higher FHRS food ratings at their initial food hygiene inspection, essential for a new business to present to

customers.

The Team contributes updates to the councils' website pages and social media content. These offer a range of information on setting up a new business, Safer Food Better Business, commonly used forms to download, how to make complaints or make an enquiry, general food safety information and a link to the FSA's website for more information.

The Team recognises the importance of social media as a highly effective means of communicating and engaging with the public. The Team maintains the West Suffolk Environmental Health Facebook page, posting articles relating to all Environmental Health Service teams. The Facebook page is used to provide general food safety information and guidance, to actively promote the Eat Out Eat Well awards and to publicise press articles that relate to our positive support of local businesses. An Eat Out Eat Well award Facebook post in early April 2018 had a reach of over 5,000 people.

2.9 Better Business for All

Supported by Regulator Delivery (RD) within the Department for Business Energy and Industrial Strategy (BEIS), we are working with other regulatory services and the New Anglia Local Enterprise Partnership (LEP), covering Norfolk and Suffolk, to develop better ways of working to improve the effective and efficient delivery of regulatory services. The core aims of the Better Business for All initiative are to:

- Raise the profile of the regulatory services provided by local authorities;
- Improve the co-ordination of information flows between the various regulators;
- Develop a greater understanding of what businesses need from local regulators;
- Improve stakeholder access to regulatory information and guidance.

2.10 Liaison with other Organisations

The Team has extensive liaison in place with a wide range of other organisations. For food safety matters these include:

- Food Standards Agency;
- Suffolk Food Liaison Group;
- Eastern Region Co-Ordinated Food Sampling Group;
- CCDC and the Anglia Health Protection Team, Anglia and Essex Public Health England Centre;
- DEFRA;
- Immigration Compliance and Enforcement Team - East of England (Home Office);
- West Suffolk Council's Planning and Building Control teams (to review relevant applications);
- Trading Standards/Environmental Health Departments nationally as required;
- Care Quality Commission;
- Suffolk Adult Safeguarding Board; and

- Suffolk Regulatory Services and New Anglia Local Enterprise Partnership Working Group.

2.11 Food Safety Promotion

The Team promotes food safety using materials made available by the FSA or produced in-house that are intended for businesses or the public. Examples include:

- helping business operators meet regulations on food hygiene through promoting and supporting the FSA's Safer Food Better Business packs;
- the use of FSA materials during Food Safety Week;
- the development of guidance for market stalls trading in West Suffolk;
- the writing of articles for distribution to businesses by external organisations.

We support the annual Crucial Crew events promoting food safety messages to year 10 school children. In July 2017, 819 children attended the Crucial Crew event in Bury St. Edmunds. The Team plans to participate at Crucial Crew events across West Suffolk as the opportunity arises.

The Team also actively support the Bury St Edmunds Christmas Fayre and other events, with the whole Team carrying out high-profile interventions at relevant stalls each year.

2.12 Healthy eating – Eat Out Eat Well

The Team actively promote the Suffolk Eat Out Eat Well (EOEW) award scheme, encouraging businesses to develop and promote healthier options in their menus and premises. We achieve this by promoting the scheme during routine inspections and other visits, providing information and advice to interested groups and businesses, and by the publication and promotion of EOEW award successes through their social media and corporate media outlets.

As at 30 April 2018, the councils have awarded 58 EOEW awards to businesses in West Suffolk. With some businesses subsequently changing ownership or closing, there are currently 50 West Suffolk businesses holding an award, incorporating 6 Bronze, 20 Silver and 24 Gold (2017 = 29). The total number of awards issued as at 30 April 2018 in Suffolk was 130 (2017 = 77).

We set ourselves an ambitious target to award the 50th EOEW award at the end of August 2017. Whilst this target was just missed, we were able to successfully publicise the 40th EOEW award at the Bury Food and Drink Festival on August bank holiday. The award was presented on the event's main stage by Jo Churchill MP and received wide and positive publicity in the press and on social media.

In November, the West Suffolk business, T'n'S Catering at Stoke College, was become the 100th recipient of an EOEW award in Suffolk. The award was presented at a special event held at the Harbour Inn in Southwold, receiving widespread positive publicity.

In December, the councils presented the 50th EOEW award to the Riverside House Hotel in Mildenhall. This award was positively promoted in the local press and on social media.

The Team have also been involved in the piloting of the Suffolk Take Out Eat Well (TOEW) award scheme due to be launched in the autumn of 2018.

3.0 **RESOURCES**

3.1 Financial Allocation

Details of budgetary provision are included as annual corporate budgets, published annually on our website.

The Councils maintain their own legal services to provide support to service areas. There is also financial provision made to enable the use of external legal services, where appropriate.

3.2 Staffing Allocation

The Team consists of (Full Time Equivalent FTE):

Commercial Environmental Health Team Leader	1.0 FTE;
Environmental Health Officers	3.8 FTE;
Technical Officer	0.4 FTE.

The Councils' current staff allocation is considered sufficient to meet the responsibilities within the service plan. Additional unplanned work may require reprioritisation within the plan in the event of its occurrence.

The Commercial Environmental Health Team Leader is the Lead Officer for food hygiene and food safety matters, in accordance with the Food Safety Act Food Law Code of Practice.

In addition to the food safety work undertaken by the Team, the officers also carry out many other statutory and discretionary duties, including accident investigations, health and safety regulation and enforcement, managing the West Suffolk Safety Advisory Group, active participation in other groups such as the Mid-Anglia Environment Safety and Health Group, skin piercing registration and regulation, smoke free regulation and enforcement.

These additional duties, and those within this Food Safety Service Plan, are carried out by a professional team of Environmental Health Officers who have the qualifications, knowledge, skills and experience to undertake such a wide variety of activities.

The Technical Officer post, created in September 2016, is a developmental one. The current Technical Officer started a Post-Graduate course at Birmingham University in September 2017 and has successfully passed all assignments to date. This 2-year course will subsequently enable them to carry out the full range of food safety interventions and enforcement and is due to be successfully completed in June 2019. The officer will be gaining practical

experience and training during this period as they carry out their usual duties.

3.3 Staff Development Plan

The Councils have a staff performance review scheme. As part of the scheme, officers formally discuss and agree individual performance targets and training/personal development plans with their line manager every 12 months. Progress with the plan is reviewed periodically so any issues can be raised and addressed.

Relevant training areas are identified to ensure the requirements for authorised officers in accordance with the Food Law Code of Practice are met. The FSA's Authorised Officer Competency Assessment form is used to help identify training and development needs.

The Team ensures that all enforcement officers are appropriately qualified and receive regular training to maintain and improve their level of competency. All officers are expected to have access to the equivalent of at least 20 hours update training, which is monitored through the team's internal Service Plan. A mixture of both internal and external training is provided for officers to achieve this aim. Following the recent decision by the Food Standards Agency to cease the provision of free training opportunities for EHO's, Suffolk authorities are working collaboratively to ensure that adequate training opportunities are available for all officers in the future.

4.0 **QUALITY ASSESSMENT**

4.1 Quality Assessment

The Team has a range of documented procedures which are subject to monitoring and review. In 2015/16 a countywide common procedure template, aligned to the 2015 Food Law Code of Practice, was designed. The documented procedures are currently being reviewed by the Team to reflect changes in the 2017 Food Law Code of Practice and the FHRS brand standard.

4.2 Inter Authority Audits and Peer Review

The principle of inter authority audits (IAA) is fully supported. The Team has previously undertaken inter-authority inspection and quality monitoring, with some benchmarking against our similar neighbouring authorities of Babergh and Mid Suffolk District Councils. Peer review also takes place amongst the team, e.g. discussions during team meetings and joint visits.

4.3 Internal Monitoring Arrangements

The Team is implementing the following arrangements to assist in assessing and improving the quality of the work carried out:

- reviewing the documented work procedures;
- checking samples of post-inspection reports, letters and notices;
- undertaking a number of shadow-inspections or follow-up visits;

- file reviews during team meetings;
- performance reviews during team meetings based on the Food Safety Service Plan and the Environmental Health Service Plan; and
- one-to-one meetings.

The contents of statutory notices will be discussed and agreed with the Team Leader or other colleagues before service, where appropriate.

4.4 Benchmarking

The Food Standards Agency (FSA) publishes on their website the food safety enforcement activity carried out by all local authorities in the UK. This information is collated from the Local Authority Enforcement Monitoring System (LAEMS) statistical returns provided by local authorities and provides a useful tool for benchmarking performance with other local authorities. The FSA also reports this performance data to Government and Europe.

Monitoring performance against the standards set out in the West Suffolk Councils Food Safety Service Plan will be via management meetings and the corporate Balanced Scorecard.

APPENDICES

Appendix 1: Extract from the Planning & Regulatory Services Business Plan 2018-19

Planning & Regulatory Services Business plan 2018/19

Assistant Director: David Collinson

Portfolio Holder(s):

Councillor Sara Mildmay-White (Housing Standards)

Councillors Alaric Pugh and Lance Stanbury (Development Management & Environmental Health)

Service Managers:

Development Management: Rachel Almond

Environmental Health: Peter Gudde

Housing Standards: Andrew Newman

Forest Heath & St Edmundsbury councils



General Action / objective	Link to strategic priority	Funding	Timing	Monitoring	Lead Officer and Portfolio Holder(s)	Other services / partners involved
Develop and implement plans to align the directorate with corporate initiatives including Single Council and General Data Protection Regulations	All priorities	Within existing revenue budget	2018/19	Directorate	Service managers/ Councillors Pugh & Stanbury	Policy/Legal Teams
Develop partnerships to support business growth whilst securing effective compliance Progress development of Growth Agenda with Growth team	Increased opportunities for economic growth Families and communities that are healthy and active	Within existing revenue budget	2017/18	Service	Service managers/ Councillors Pugh & Stanbury	Growth Team
Act as the corporate lead to develop the New Anglia 'Better Business for All' approach to smarter business regulation	Increased opportunities for economic growth Being more commercial	Within existing revenue budget	2017/18	Service	Peter Gudde/ Councillors Pugh & Stanbury	Growth Team/Policy Team
Respond to all service requests according to set performance targets	Increased opportunities for economic growth Families and communities that are healthy and active Homes for our communities	Within existing revenue budget	2017/18	Service/Balanced scorecard	Service managers/ Councillors Pugh & Stanbury	

Undertake targeted and proportionate enforcement in accordance with national guidance and corporate enforcement policies Update and amalgamate Corporate Enforcement Policy Audit and update warrants for entry across the service	Increased opportunities for economic growth Families and communities that are healthy and active Homes for our communities	Within existing revenue budget	2017/18	Service	Service managers/ Councillors Pugh & Stanbury	All teams involved in enforcement
Maximise electronic working and improve on-line access to advice and support to promote customer self-service	Increased opportunities for economic growth Families and communities that are healthy and active Homes for our communities	Within existing revenue budget	2017/18	Service	Service managers/ Councillors Pugh & Stanbury	DM, LLC, Customer Services
Enhance social media tools to promote the service	Increased opportunities for economic growth Families and communities that are healthy and active Homes for our communities	Within existing revenue budget	2017/18	Service	Service managers/ Councillors Pugh & Stanbury	IT
Extend, where appropriate, the commercial culture to service delivery	Being more commercial	Within existing revenue budget	2017/18	Service	Service managers/ Councillors Pugh & Stanbury	

This page is intentionally left blank