Licensing and Regulatory Committee

Forest Heath District Council

Title:	**Agenda**
Date:	**Monday 2 July 2018**
Time:	**6.00 pm**
Venue:	**Council Chamber** **District Offices** College Heath Road Mildenhall
Full Members:	*Conservative Members (8)*: Michael Anderson, Chris Barker, John Bloodworth, Simon Cole, Brian Harvey, Carol Lynch, Christine Mason, Nigel Roman *West Suffolk Independent Member (1)*: Victor Lukaniuk *UKIP Member (1)*: Reg Silvester
Substitutes:	Named substitutes are not appointed
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:	Three Members
Committee administrator:	**Helen Hardinge** Democratic Services Officer **Tel:** 01638 719363 **Email:** helen.hardinge@westsuffolk.gov.uk

Public Information

Forest Heath
District Council

Venue:	**District Offices** College Heath Road Mildenhall Suffolk, IP28 7EY	Tel: 01638 719000 Email: democratic.services@westsuffolk.gov.uk Web: www.westsuffolk.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 District 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 speaking:	Members of the public who live or work in the District 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. 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.	
Disabled access:	The public gallery is on the first floor and is accessible via stairs. There is not a lift but disabled seating is available at the back of the Council Chamber on the ground floor. Please see the Committee Administrator who will be able to help you.	
Induction loop:	An Induction loop operates to enhance sound for anyone wearing a hearing aid or using a transmitter.	
Recording of meetings:	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). 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.	

Personal Information:	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.

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Procedural Matters

Part 1 – Public

1. Election of Chairman for 2018/2019

2. Election of Vice Chairman for 2018/2019

3. Apologies for Absence

4. Substitutes

5. Public Participation

Members of the public who live or work in the District are invited to put one question or statement of not more than three minutes duration relating to items 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. A person wishing to speak must register to speak 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.

6. Minutes **1 - 4**

To confirm the minutes of the meeting held on 9 April 2018 (copy attached).

7. West Suffolk Local Air Quality - Progress Report 2017-2018 **5 - 82**

Report No: **LIC/FH/18/003**

8. West Suffolk Food Safety Service Plan 2018-2019 **83 - 112**

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

Licensing and Regulatory Committee

Minutes of a meeting of the **Licensing and Regulatory Committee** held on **Monday 9 April 2018** at **6.00 pm** at the **Council Chamber, District Offices,** College Heath Road, Mildenhall IP28 7EY

Present: **Councillors**

Chairman Brian Harvey
Vice Chairman Michael Anderson

Chris Barker	Victor Lukaniuk
John Bloodworth	Carol Lynch
Simon Cole	Nigel Roman

89. **Apologies for Absence**

Apologies for absence were received from Councillor Reg Silvester.

Councillor Christine Mason was also unable to attend the meeting.

90. **Substitutes**

There were no substitutes present at the meeting.

91. **Public Participation**

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

92. **Minutes**

The minutes of the meeting held on 22 January 2018 were unanimously accepted as an accurate record and were signed by the Chairman.

93. **Hackney Carriage Fare Review 2018 (Report No: LIC/FH/18/002)**

The Committee received Report No: LIC/FH/18/002, which asked Members to consider proposed hackney carriage fare alignments.

Under the Council's Constitution, the Committee could set or refuse hackney fares and these were reviewed annually. However, on this occasion, the review was also anticipating the alignment of the fares in respect of the proposal for Forest Heath District and St Edmundsbury Borough to form a single West Suffolk Council in 2019.

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:

Option 1: Approve the advertising of the proposed new Hackney Carriage fares for Forest Heath; or

Option 2: Approve the advertising of the proposed new Hackney Carriage fares devised for Forest Heath, 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 highlighted that the proposed fares (set out in Appendix 2) had been produced following extensive joint working between Officers and the Trade. The fares being proposed had also been scrutinised and overseen by the Councils' meter agents (Digitax and Panther Taxis), who calibrated all Hackney Meters for West Suffolk.

The Committee considered the report in detail and asked a number of questions, to which responses were provided. Disappointment at the number of responses to the consultation from the Trade were voiced.

The Chairman advised Members that in addition to the fares, ongoing discussions were taking place between Officers and the two Licensing and Regulatory Committee Chairmen in order to identify other areas of work which would need to be aligned in respect of single council.

Councillor Simon Cole proposed Option 2; in that the proposed new Hackney Carriage Fares for Forest Heath were advertised for implementation on 4 June 2018 and the St Edmundsbury set of fares be recommended for Stage 2 to be in place for West Suffolk Council in 2019. This was duly seconded by Councillor Michael Anderson.

Upon being put to the vote, and with the vote being unanimous it was

RESOLVED:

That:-

Option 2 be approved:

1. Stage 1: The proposed new Hackney Carriage fares devised for Forest Heath District Council (as set out in Appendix 2 to Report No LIC/FH/18/002) be advertised with the effective date of the implementation of the increase being 4 June 2018 (subject to statutory procedure relating to public objections); and
2. Stage 2: The proposed new Hackney Carriage fares devised for St Edmundsbury Borough Council (as set out in Appendix 2 to Report No LIC/FH/18/002) be recommended to be in place for West Suffolk Council in 2019.

94. **Cumulative Impact Policy for Newmarket (verbal)**

The Licensing Team Leader advised the Committee that the Council's current Statement of Licensing Policy was due to expire in January 2019. Accordingly, consultation on a revised version of the document was due to commence later in 2018.

The Committee was informed that the two policies were already very similar and in light of the planned (single) West Suffolk Council in 2019 Officers would be looking to align the two documents currently operated by Forest Heath and St Edmundsbury even further.

As Members were aware, Forest Heath's Statement of Licensing Policy contained the Cumulative Impact Policy (CIP) for Newmarket. The Officer reminded the Committee that the CIP was created in response to a 'saturation' situation within Newmarket High Street.

However, the night-time economy within the town had significantly reduced over recent years and the CIP was largely considered to have outlived its purpose.

The Chairman explained that without official crime/incident statistics demonstrating a need for the CIP it could no longer be justified.

The general consensus of the Committee was that the CIP could be allowed to expire in January 2019 on the basis that reimplementation could be considered by the Council at any time, if considered necessary.

The Officer encouraged local Ward Members to continue to monitor the situation and to ensure that any residents that raised concerns with them were advised to formally notify the Licensing Authority.

(Councillor Victor Lukaniuk left the meeting at 6.31pm during the discussion of this item.)

The meeting concluded at 6.40pm

Signed by:

Chairman

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Licensing and Regulatory Committee

Forest Heath District Council

Title of Report:	**West Suffolk Local Air Quality – Progress Report 2017-2018**
Report No:	**LIC/FH/18/003**
Report to and date/s:	Licensing and Regulatory Committee – 2 July 2018
Portfolio Holder:	Councillor Lance Stanbury Portfolio Holder for Planning & Growth Tel: 07970 947704 Email: lance.stanbury@forest-heath.gov.uk
Lead officer:	Matthew Axton Environment Officer Tel: 01284 757041 Email: matthew.axton@westsuffolk.gov.uk
Purpose of report:	To report on the work undertaken during 2017 to meet Local Air Quality regulations across the District.
Recommendation:	**It is recommended that the Committee note the work undertaken in order to improve local air quality in West Suffolk.**
Key Decision:	*Is this a Key Decision and if so, under which definition?* No, it is not a Key Decision - ☒
Consultation:	Consultation required with the Department of Environment (Defra) to approve technical elements of the Annual Status Report.
Alternative option(s):	N/A – statutory duty
Implications:	
*Are there any **financial** implications?* *If yes, please give details*	Yes ☐ No ☒
*Are there any **staffing** implications?* *If yes, please give details*	Yes ☐ No ☒

*Are there any **ICT** implications? If yes, please give details*		Yes ☐ No ☒	
*Are there any **legal and/or policy** implications? If yes, please give details*		Yes ☐ No ☒	
*Are there any **equality** implications? If yes, please give details*		Yes ☐ No ☒	
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.	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	
Background papers: *(all background papers are to be published on the website and a link included)*		None	
Documents attached:		Appendix 1 - 2018 Air Quality Annual Status Report (ASR).	

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. The 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 that within Newmarket) 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 (NO_2), which is primarily caused by emissions from vehicle exhausts, for which the national annual mean objective (threshold) is 40 microgrammes per metre cubed ($\mu g/m^3$) to be applied at the façade of residential properties. An hourly objective also exists for NO_2, to be applied along busy shopping streets, and should be considered where the annual mean level is 60 $\mu g/m^3$ or greater. There were 34 monitoring sites within Forest Heath during 2017.

1.6 Road transport is a major source of air pollution both nationally and locally. The Councils in West Suffolk 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 documents including the "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 2017-18

2.1 For the majority of the District, air quality remains good and continues to show a long term trend of slight year on year improvement. However, we continue to undertake detailed monitoring throughout the district.

2.2 All monitored locations in Forest Heath District Council were below the national objectives for nitrogen dioxide in 2017, with the highest recorded value being on London Road in Brandon, where an annual average value of 37.4 $\mu g/m^3$ was recorded.

2.3 This committee approved the amendment of the Newmarket Air Quality Management Area (Report No: LIC/FH/17/004, April 2017). This amendment reduced the designated area and has now been enacted through an official order and the details accepted by Defra.

2.4 Together with County Council Highways officers, your officers have attended a number of meetings regarding traffic in Brandon and will continue to explore any options that may help the to address the concerns of local residents and their representatives with regards to traffic and pollution in the town.

2.5 Your officers installed additional monitoring in 2016 and 2017 within the Air Quality Management Area in Newmarket, which is centred on Old Station Road due to the presence of sensitive ground floor residential dwellings. The results from this increased monitoring indicate that the remaining designated area may be able to be revoked in the near future, although officers recommend a further year of data collection in 2018 prior to any final decision.

2.6 An area of concern to residents and their representatives in Newmarket has been the taxi rank and unnecessary vehicle idling by taxi drivers. Your officers, in close partnership with officers from the Licensing Team have worked to reduce idling throughout 2017. This has resulted in the monitoring point adjacent to the taxi rank showing the largest decrease in pollution levels from 2016 to 2017 in Forest Heath, with a 9% drop in levels recorded.

2.4 Although levels of measured pollutants in Forest Heath 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 3 below.

2.7 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 Aldi supermarket on Exning Road, Newmarket (DC/17/1597/FUL).
- Promotion of 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. Next Steps

3.1 Your officers will continue to undertake the following activities:

- Continue monitoring levels of nitrogen dioxide throughout the District.
- 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.

4. Additional supporting information

4.1 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.

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Forest Heath District and St Edmundsbury Borough councils

Forest Heath & St Edmundsbury councils

West Suffolk

working together

2018 Air Quality Annual Status Report (ASR)

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

June 2018

Local Authority Officer	Matthew Axton
Department	Environment & Energy Team, Planning & Regulatory Services
Address	Forest Heath District Council District Offices College Heath Road Mildenhall Suffolk IP28 7EY St Edmundsbury Borough Council West Suffolk House Western Way Bury St Edmunds Suffolk IP33 3YU
Telephone	01284 757041
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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 billion[3].

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 consider 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

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

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.

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

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

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.

- 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.

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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 (AQMAs) 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 1to 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 great 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 NO_2 Monitoring Results for the last 5 years) should be distance adjusted to a relevant receptor. However, given that the data has been presented without wholescale 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.

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

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.

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	

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	
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
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 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

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 PM_{10} 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 NO_2 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 (NO_2)

Table A.2 in Appendix A compares the ratified and adjusted monitored NO_2 annual mean concentrations for the past 5 years with the air quality objective of 40µg/m^3.

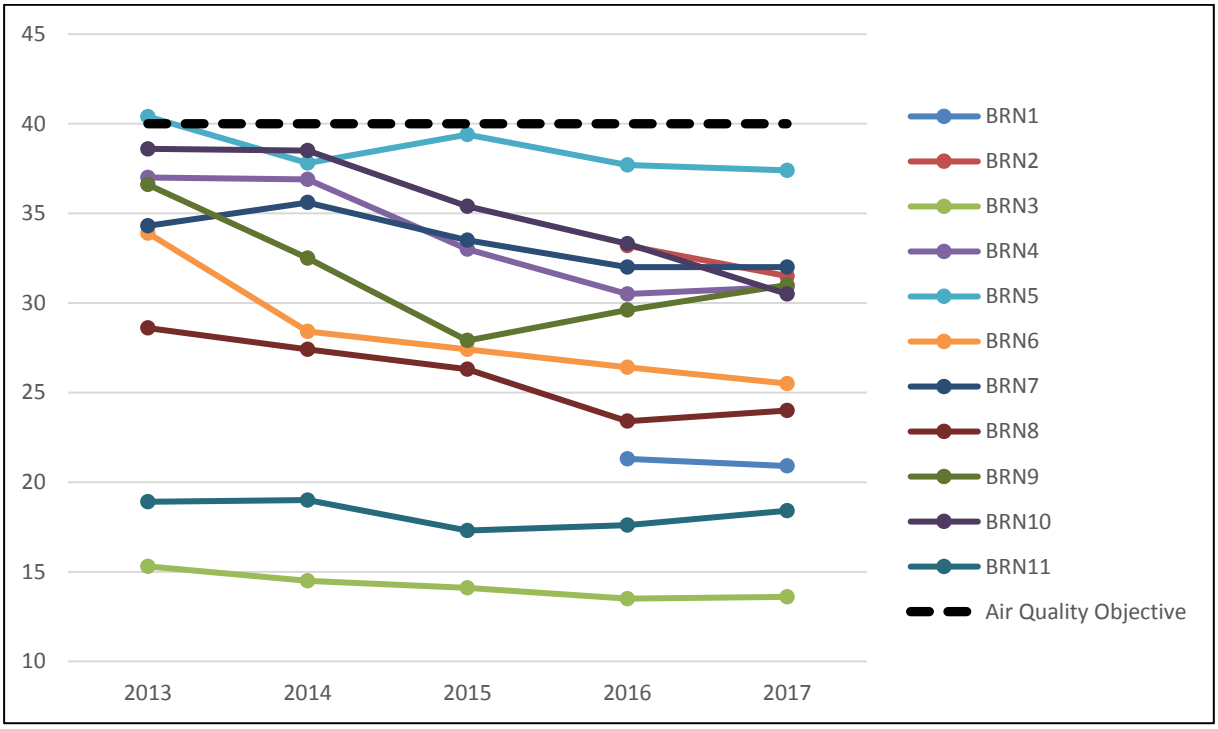
For diffusion tubes, the full 2017 dataset of monthly mean values is provided in Appendix B. All data on the below graphs is concentrations of Nitrogen Dioxide in µg/m^3.

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

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 8.1µg/m^3 or 21% over 5 years whilst BRN5 (52 London Road) has only dropped by 3.0µg/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 40.4µg/m^3 (compared to an objective of 40.0µg/m^3) in 2013, although this is not at a relevant receptor location. BRN5 remains the highest recorded monitoring location in Brandon at 37.4µg/m^3, with no other monitoring locations being above 32.0µg/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

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 (44.7µg/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 34.4µg/m^3 and 31.4µg/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.

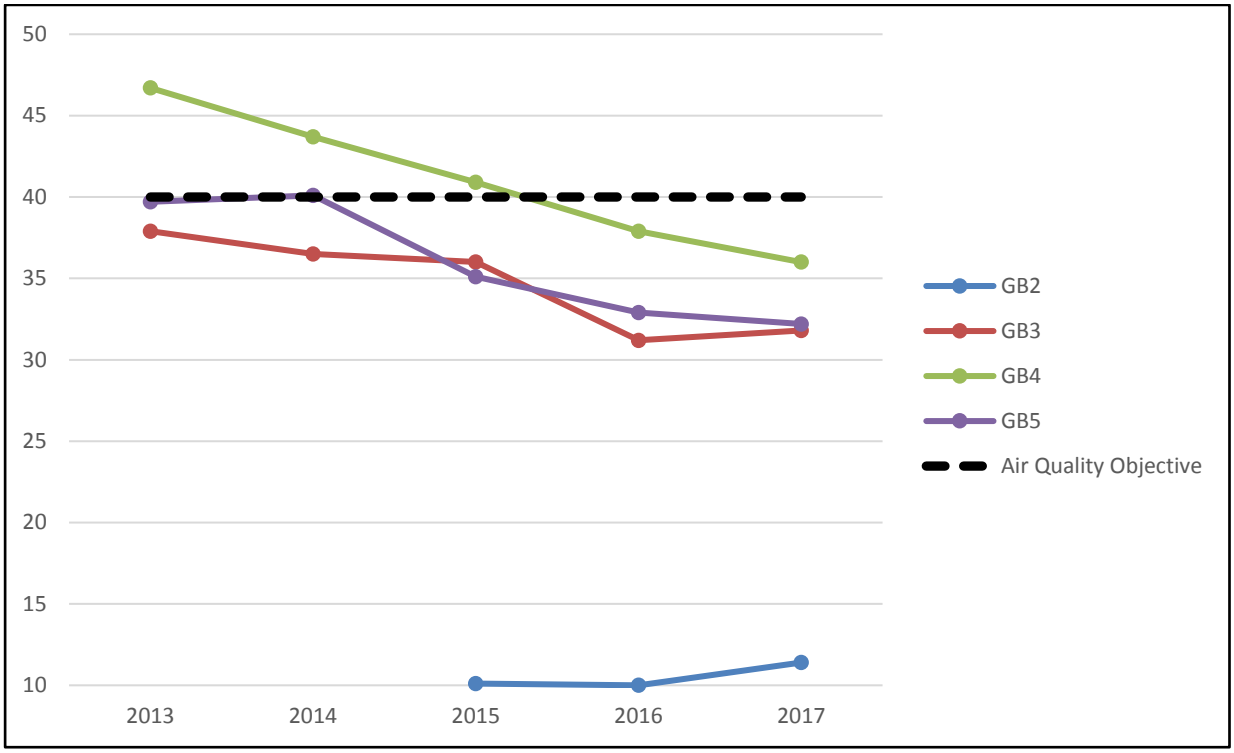
Great Barton

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 36.0µg/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.

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 40µg/m^3. The status of the AQMA will be reassessed in 2019 when the data from the two new monitoring points is available.

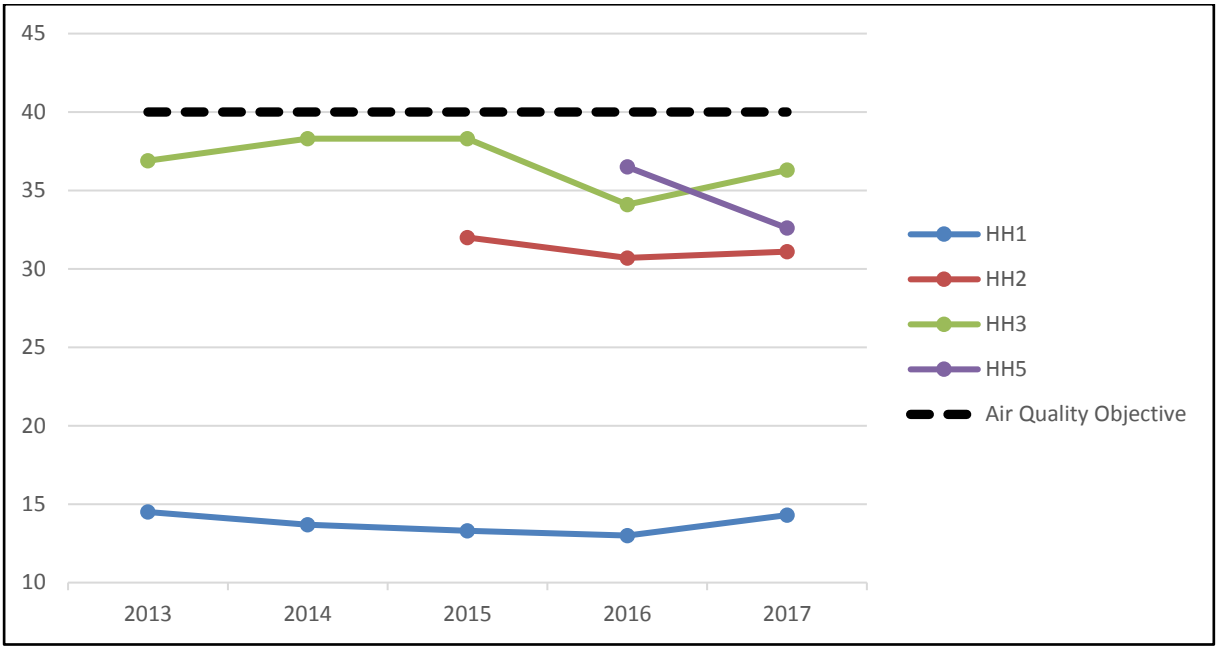
Figure 2 Trends in Concentration of Air Pollution in Great Barton (not adjusted to façade of buildings)



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 36.3µg/m^3 (HH3, 29 Withersfield Road). The long term monitoring at this location does not indicate a particular trend with levels flucuating 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 (23.2µg/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

West Suffolk, with 2017 monitoring (36.4µg/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.

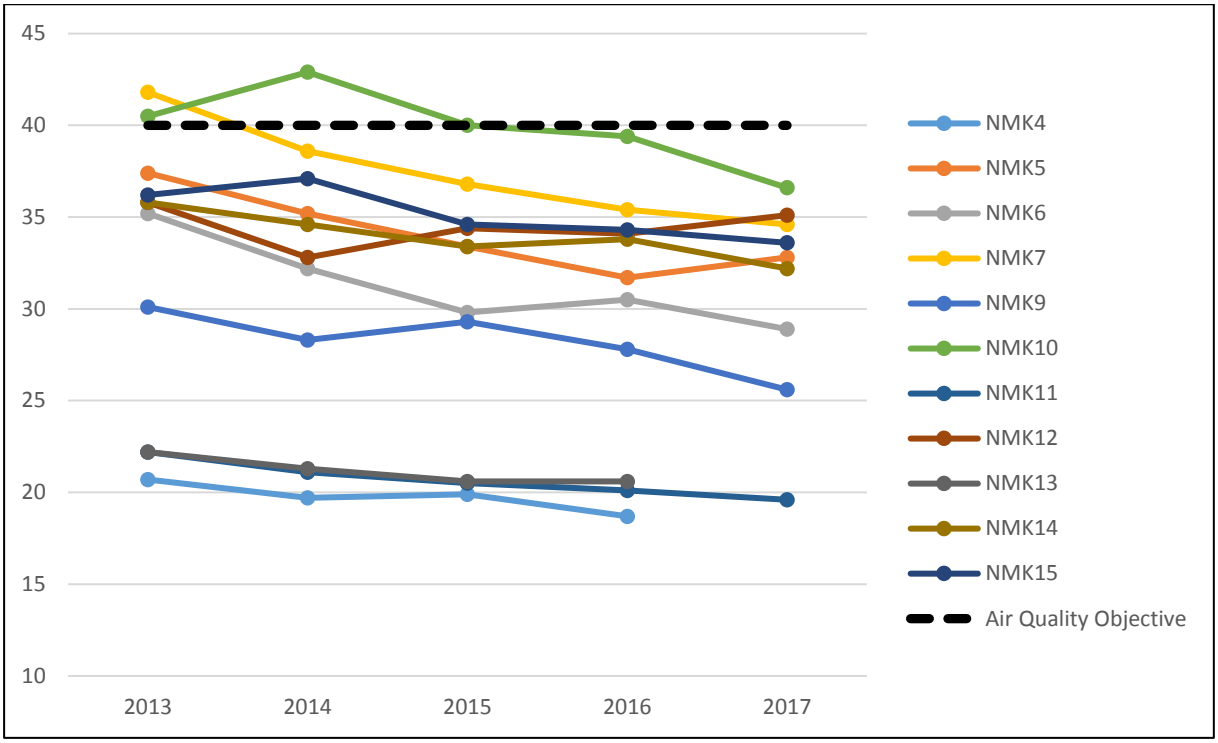
Newmarket Town Centre

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 60µg/m^3, whilst the annual mean of 40µg/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 39.4µg/m^3 to 36.6µg/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.

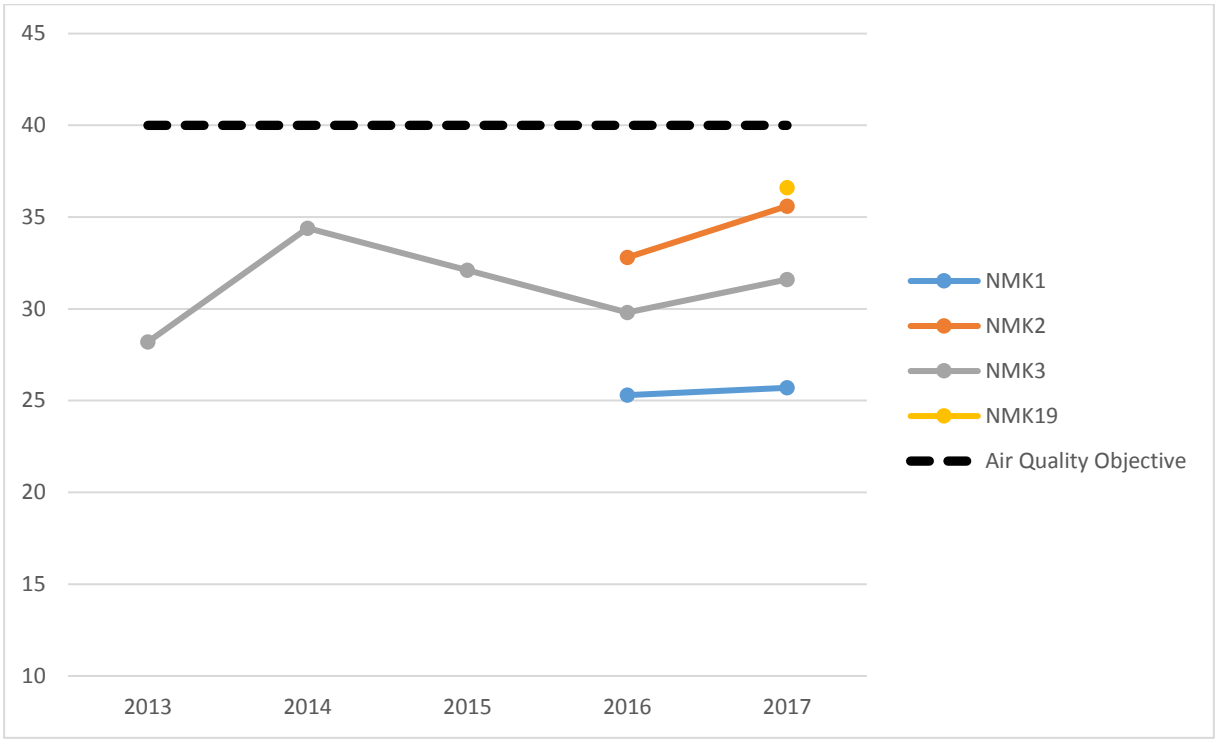
Figure 4. Trends in Concentration of Air Pollution on Newmarket High Street (not adjusted to façade of buildings)



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

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

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

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

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

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 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 NO_2 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 ($\mu g/m^3$) [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

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

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

Site ID	Site Type	Monitoring Type	Valid Data Capture for Monitoring Period (%) [1]	Valid Data Capture 2017 (%) [2]	NO_2 Annual Mean Concentration ($\mu g/m^3$) [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

Site ID	Site Type	Monitoring Type	Valid Data Capture for Monitoring Period (%) (1)	Valid Data Capture 2017 (%) (2)	NO_2 Annual Mean Concentration ($\mu g/m^3$) (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 NO_2 annual mean objective of 40µg/m^3 are shown in **bold**.

NO_2 annual means exceeding 60µg/m^3, indicating a potential exceedance of the NO_2 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 – NO_2 Monthly Diffusion Tube Results - 2017

Site ID	NO_2 Mean Concentrations ($\mu g/m^3$)														
	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

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

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		

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)
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 NO_2 annual mean objective of 40µg/m^3 are shown in **bold**.

NO_2 annual means exceeding 60µg/m^3, indicating a potential exceedance of the NO_2 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
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.

This spreadsheet will be updated at the end of June 2018

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[3] 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[2]	If you have your own co-location study then see footnote[4]. 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 (To undo your selection, choose (All) from the pop-up list)	Year[2] (To undo your selection, choose (All))	Site Type	Local Authority	Length of Study (months)	Diffusion Tube Mean Conc. (Dm) (µg/m³)	Automatic Monitor Mean Conc. (Cm) (µg/m³)	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	Marylebone 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[3] (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).

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

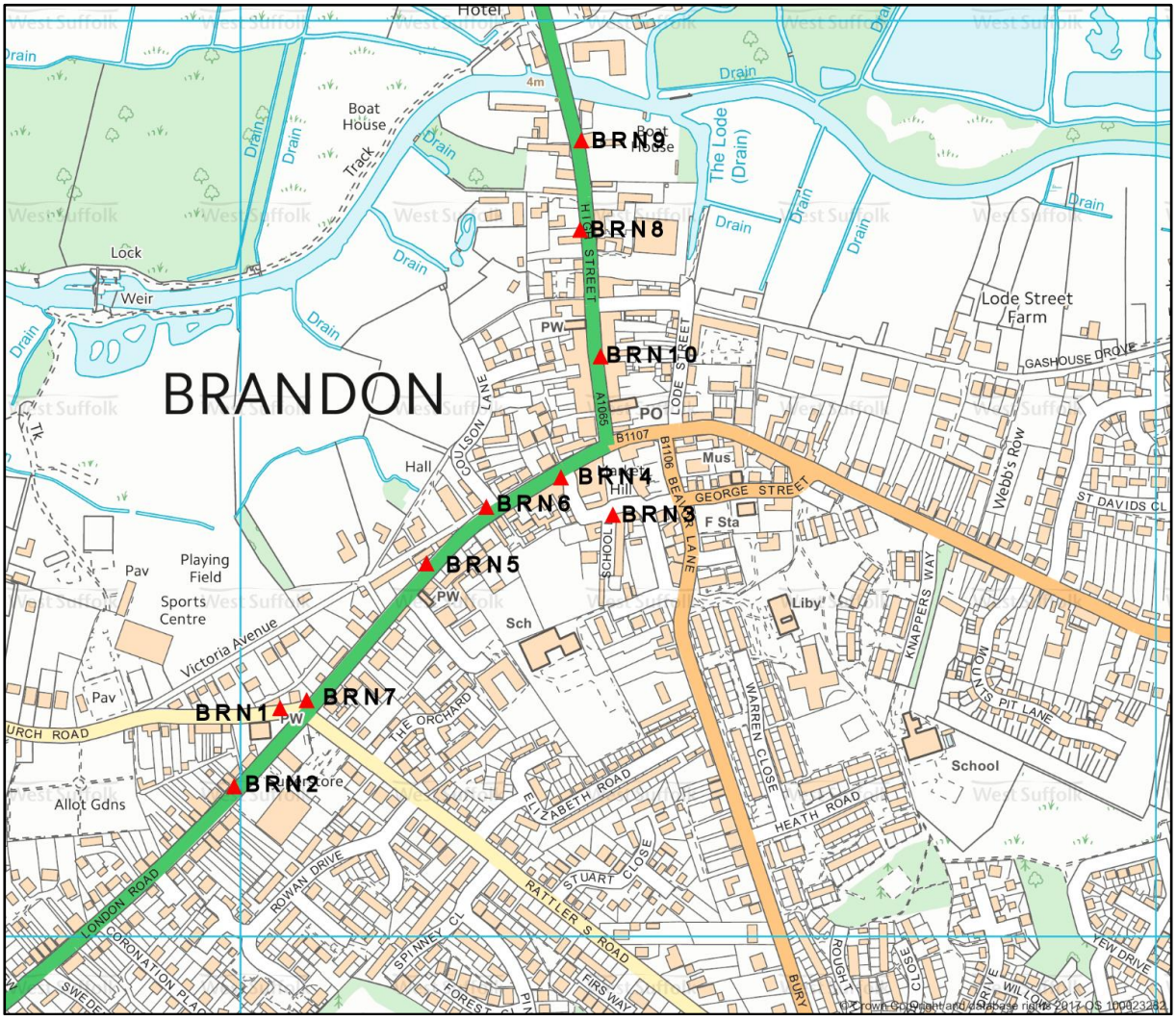
Distance correction was carried out on all sites were the monitoring was not carried out at a relevant receptor location. For Newmarket High Street, the hourly objective applies at the monitored sites, but the sites were adjusted to the façade of the nearest property so that the annual objective could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

For all calculations, the Defra NO_2 fall off with distance tool (March 2018) was used. For the mean annual background concentration the following sites were used:

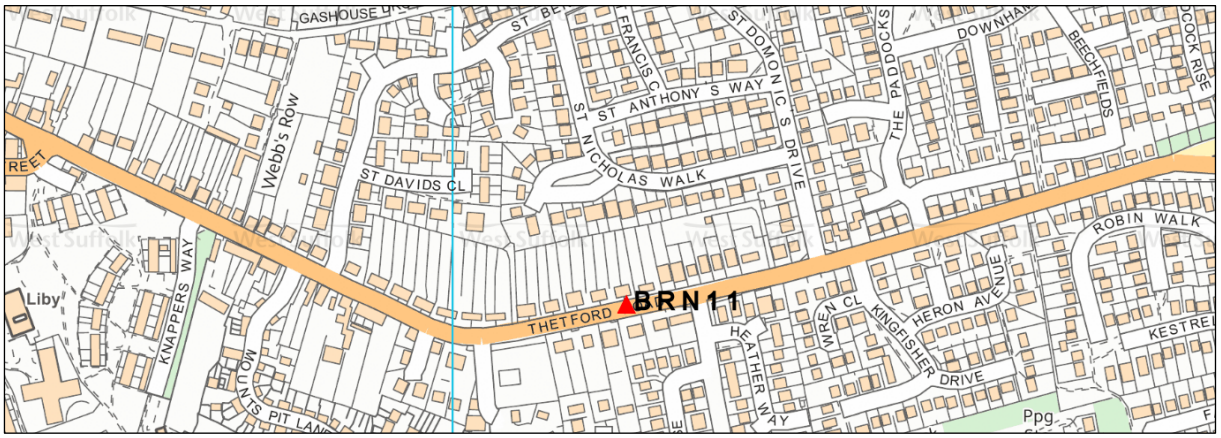
- Brandon, Lakenheath, Icklingham and Mildenhall – LAK2
- Newmarket – NMK8
- Bury St Edmunds – BSE10
- Great Barton – GB2
- Haverhill – HH1

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

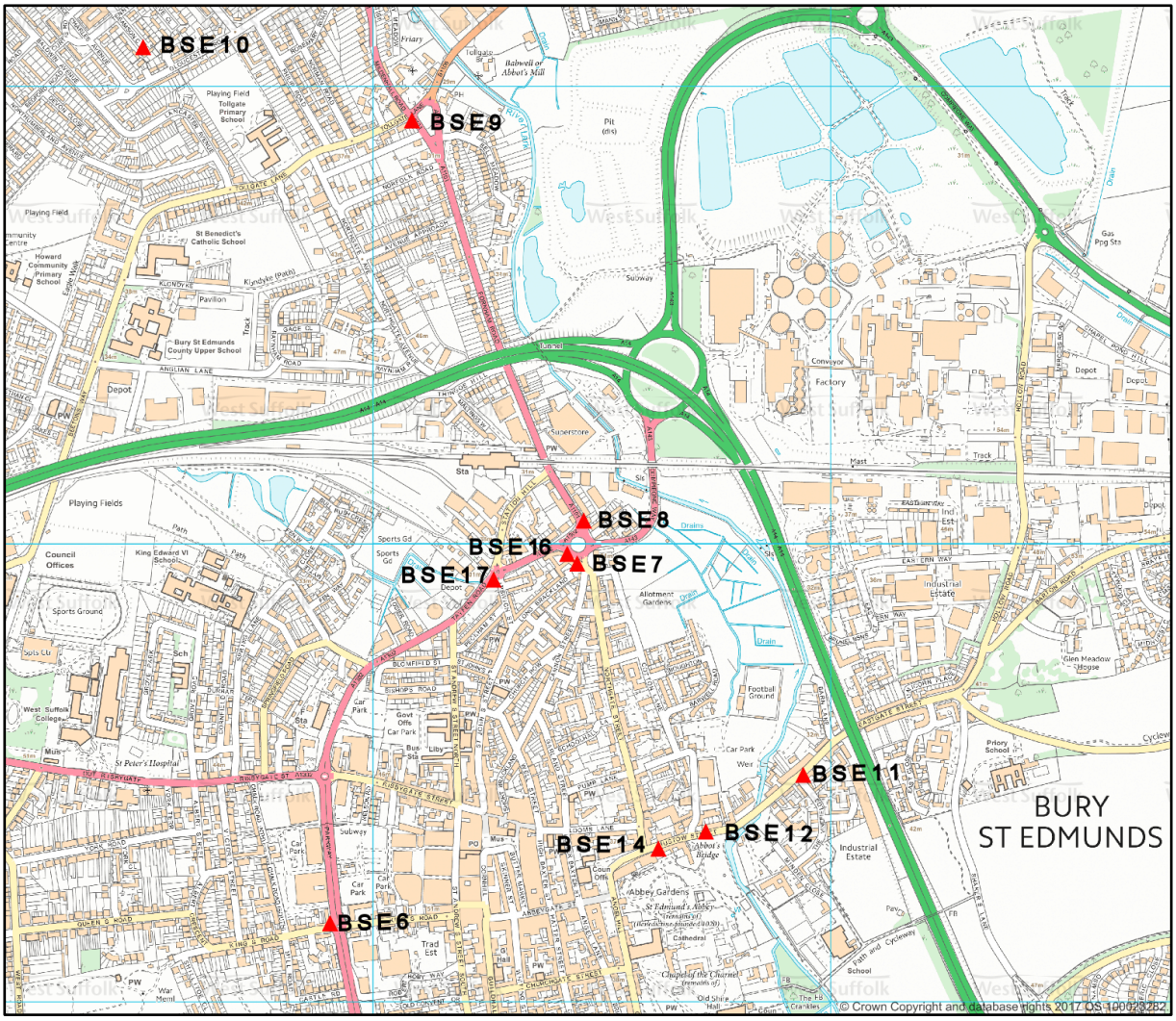
Brandon Diffusion Tube Locations



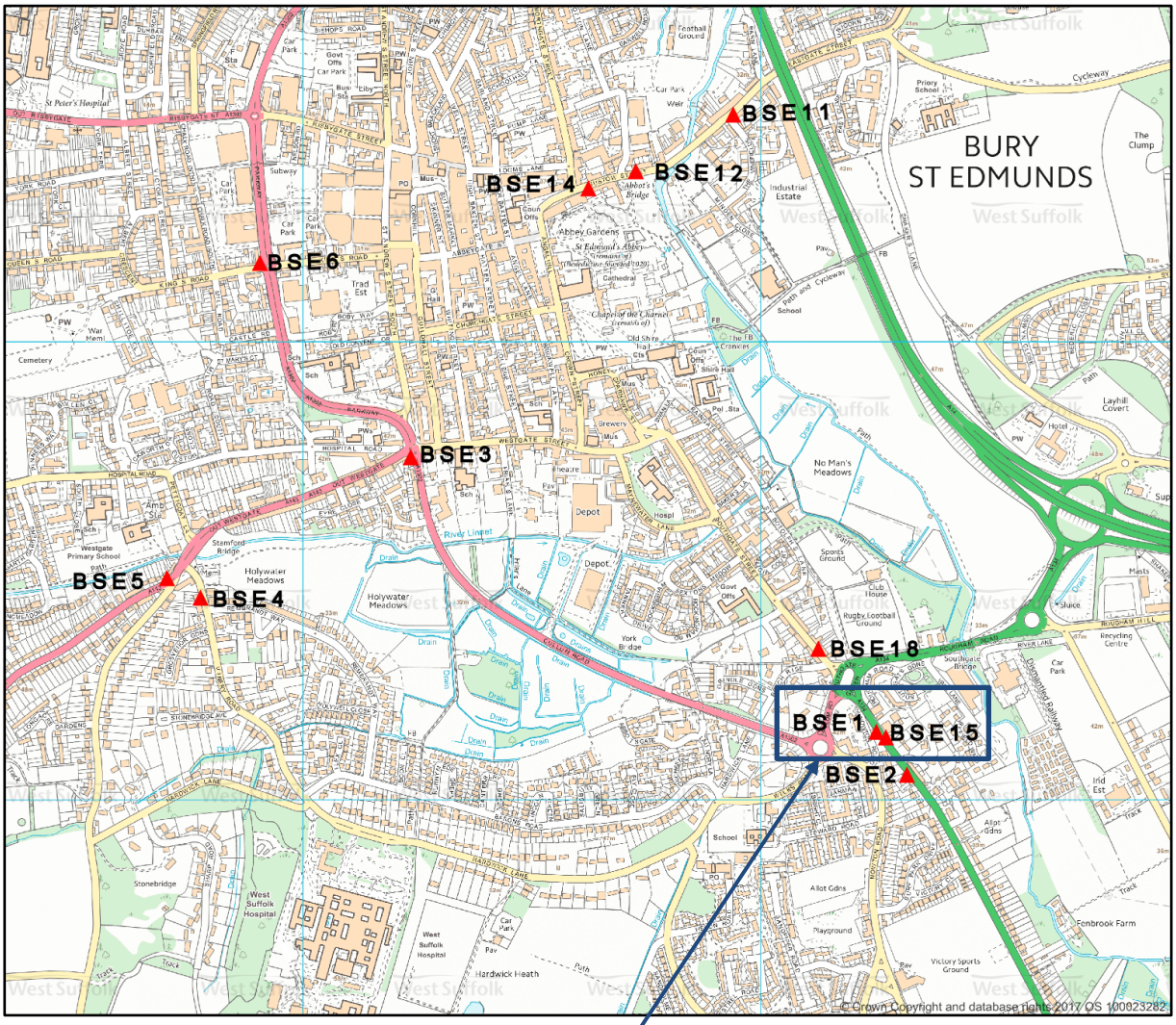
BRN11 to East of Town Centre



Bury St Edmunds (north) Diffusion Tube Locations

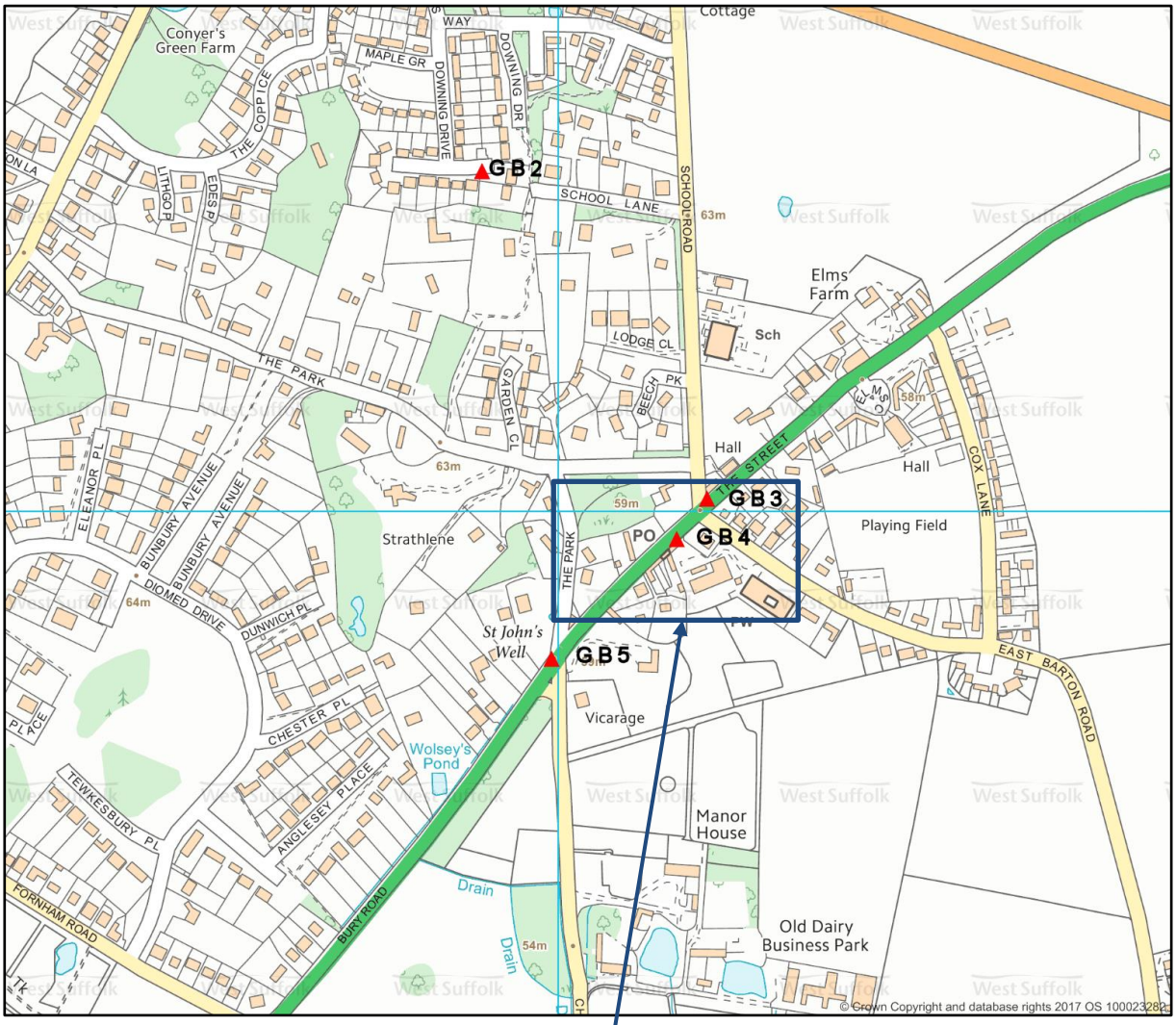


Bury St Edmunds (south) Diffusion Tube Locations

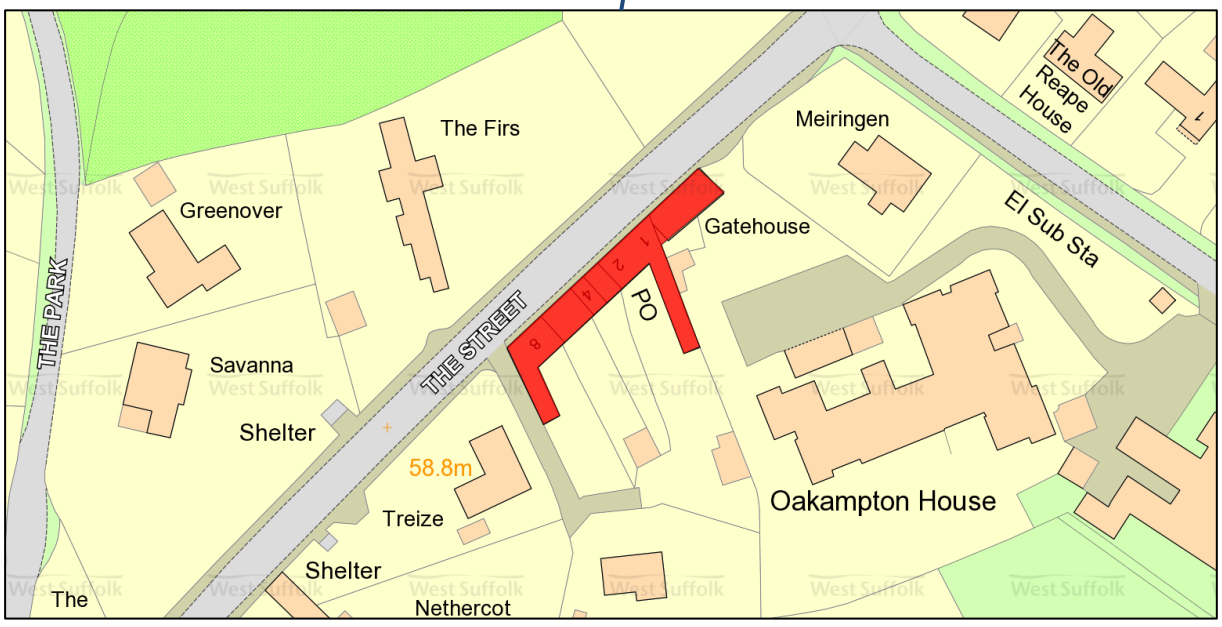


Sicklesmere Road AQMA Location

Great Barton Diffusion Tube Locations

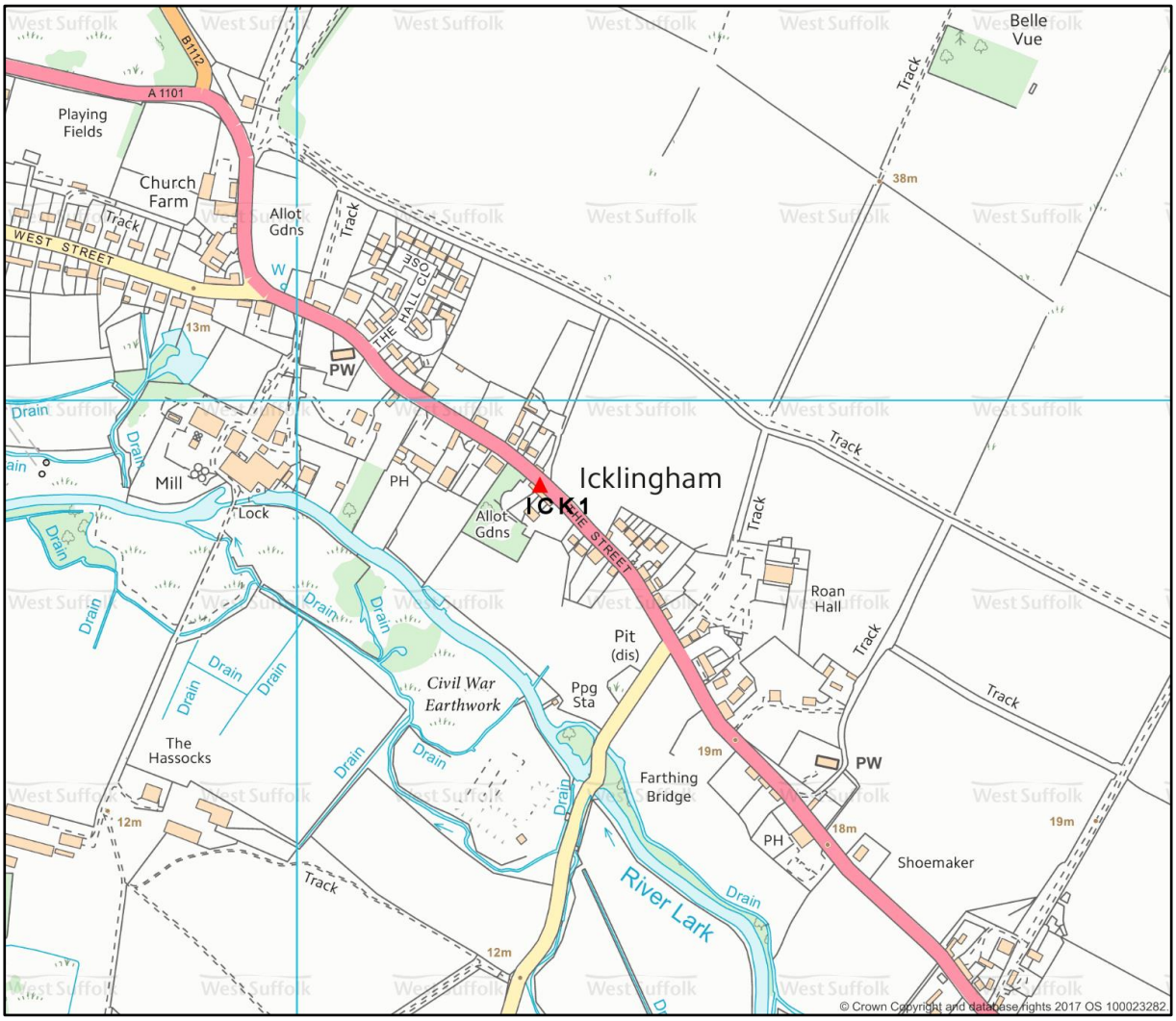


Great Barton AQMA Location

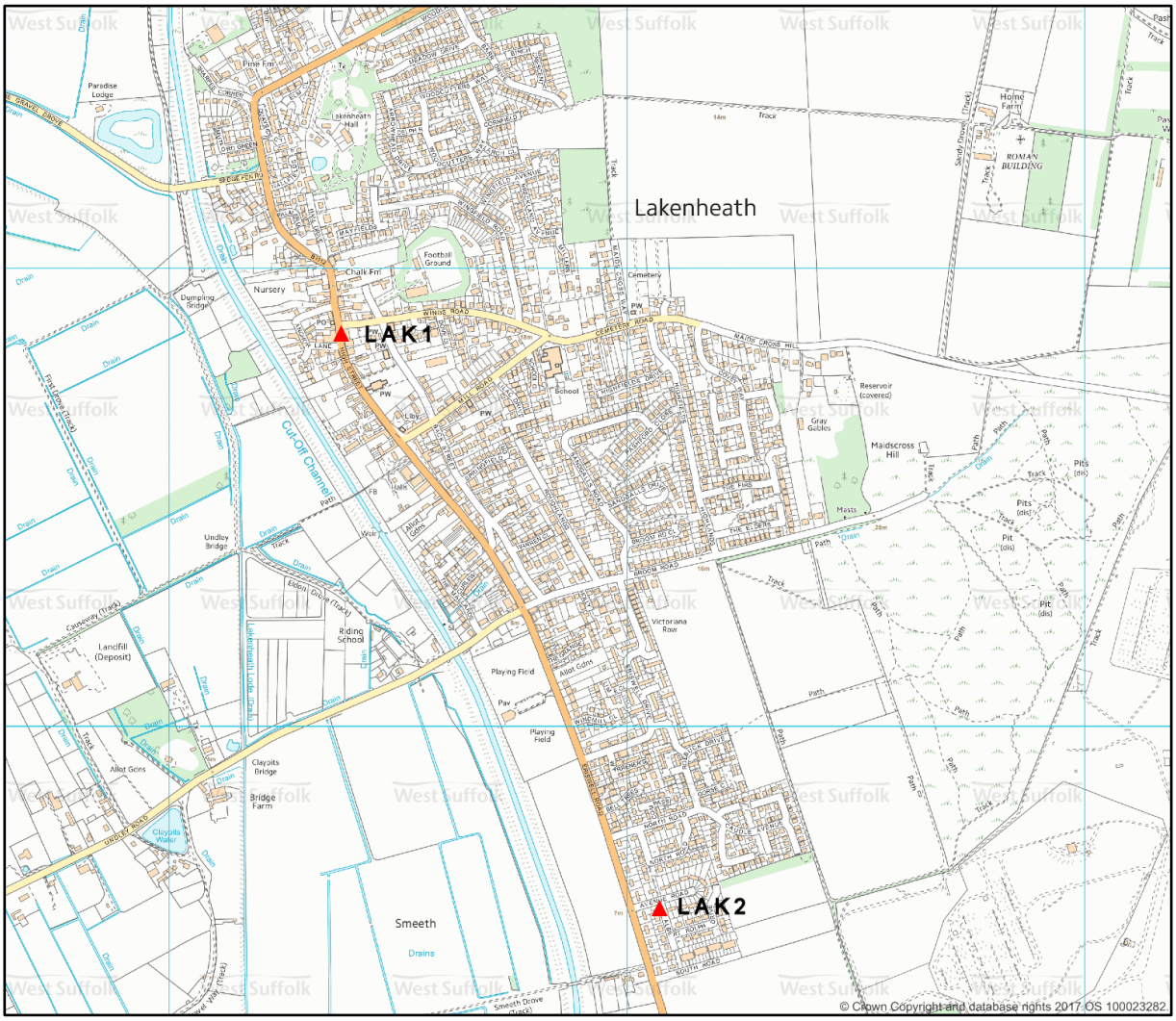


Haverhill Diffusion Tube Locations

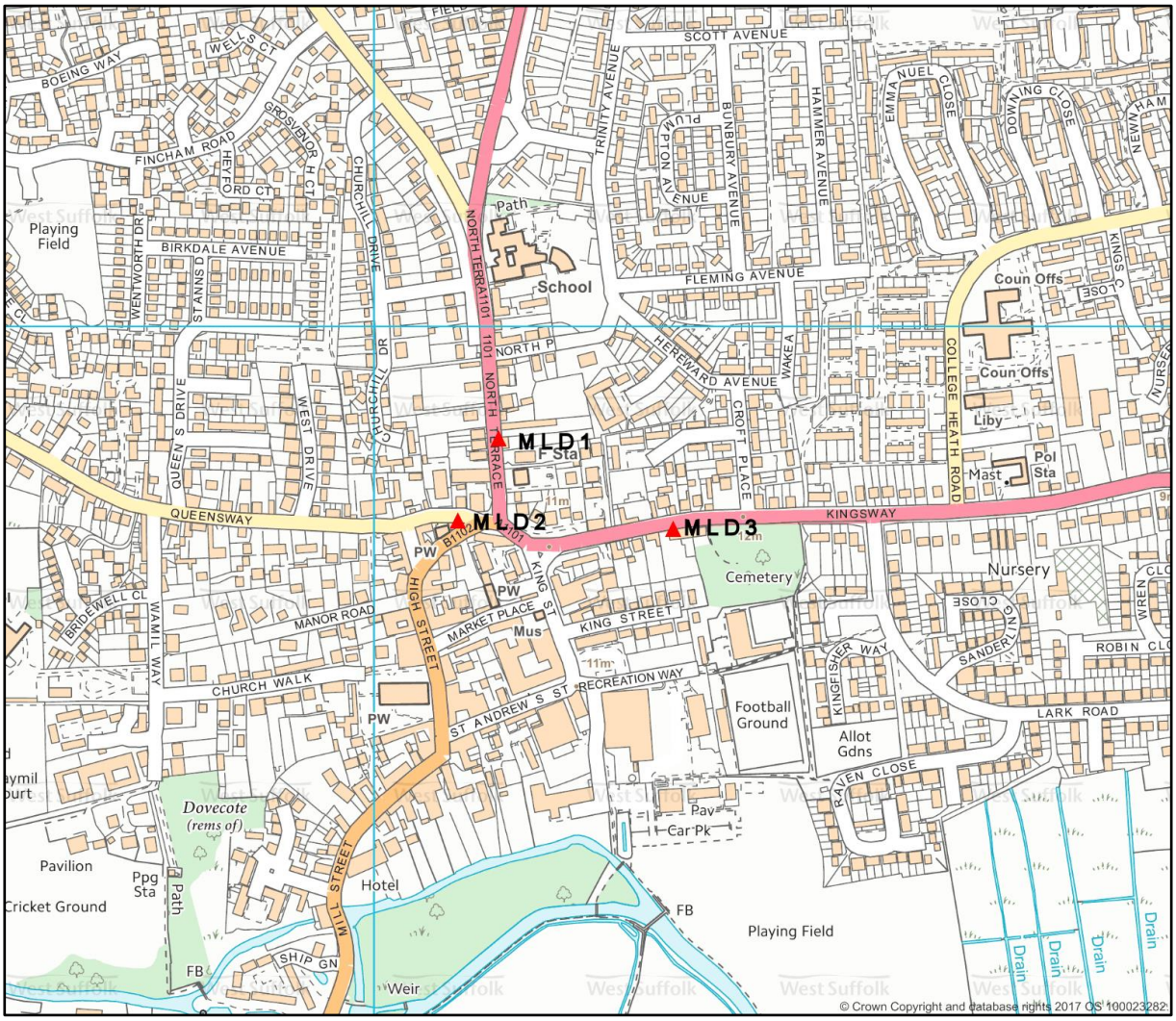
Icklingham Diffusion Tube Location



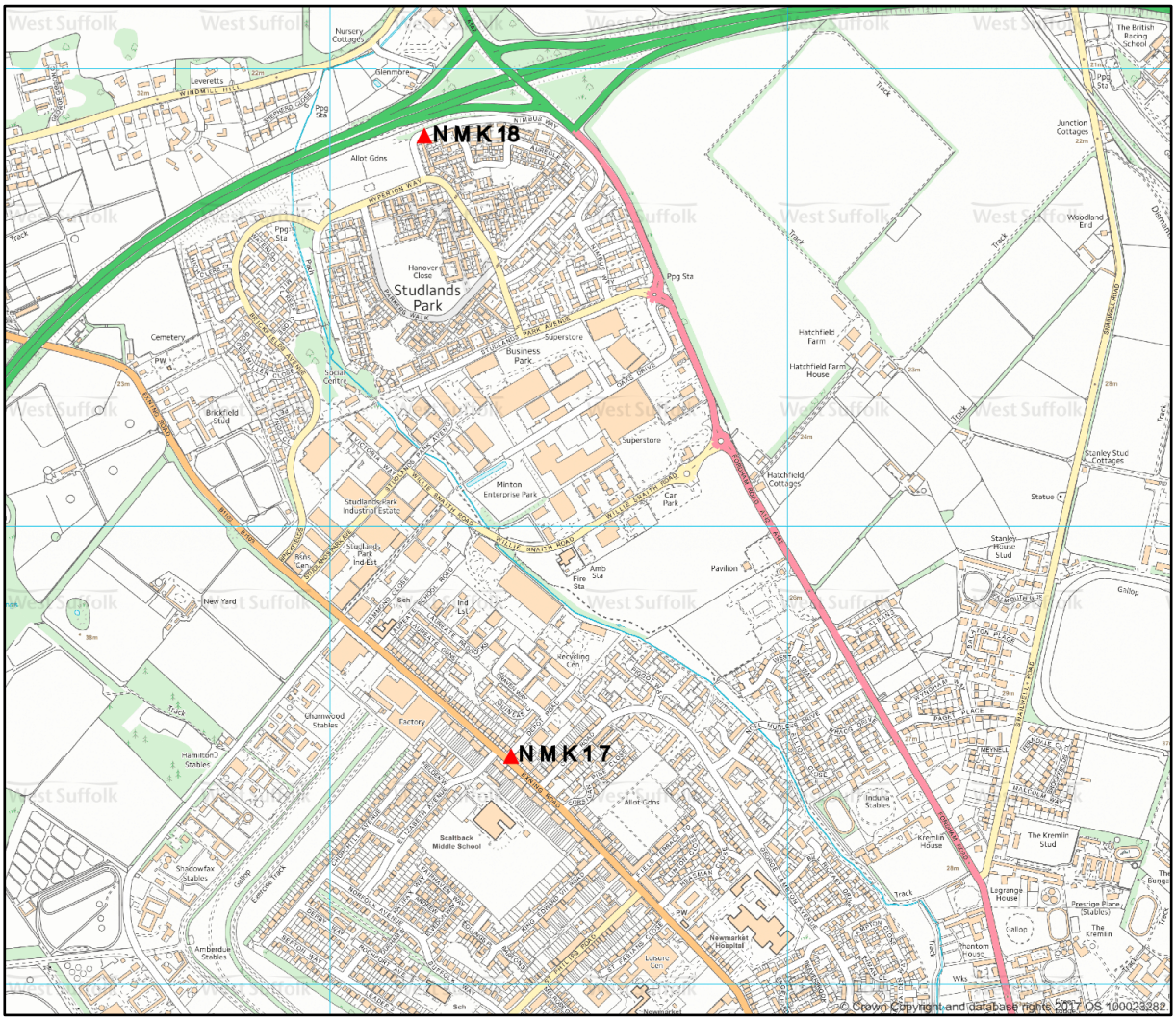
Lakenheath Diffusion Tube Locations



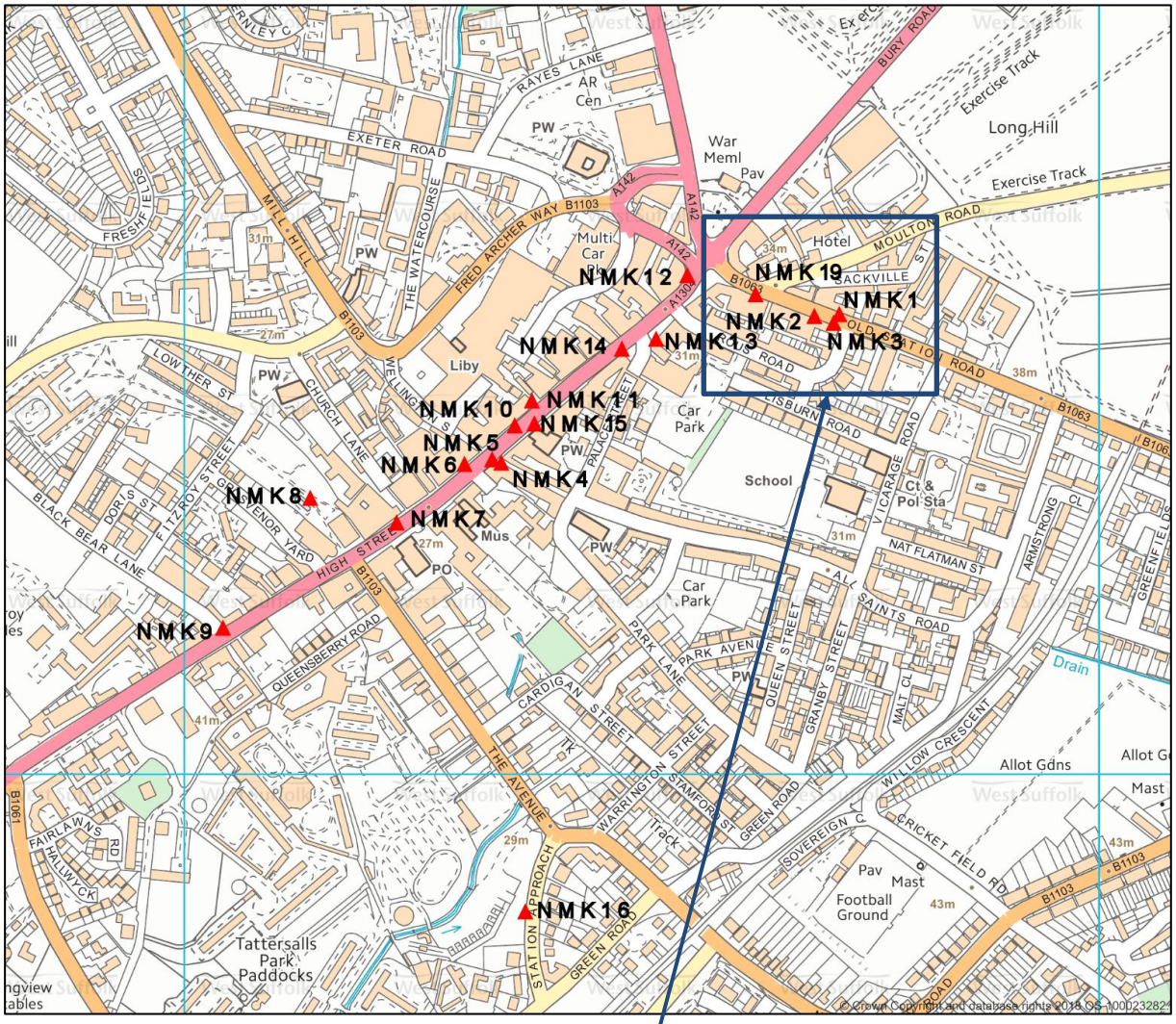
Mildenhall Diffusion Tube Locations



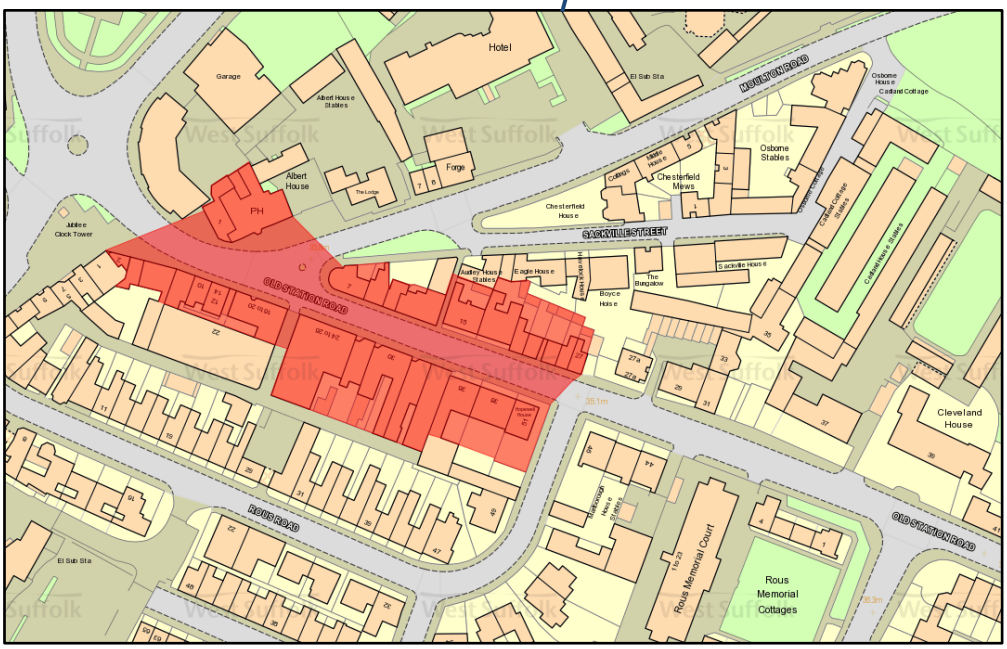
Newmarket (north) Diffusion Tube Locations



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 micrograms of pollutant per cubic metre of air (µg/m^3).

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 (NO_2) 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 pollution[5]. 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

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 dementia[1]. 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 CO_2 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.

[6] Environmental 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/

- 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 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.

- **Upper tier** authorities have control over many aspects responsible for poor air quality, notably transport[9], but also public health and highways[10].

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/laqm_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)**
Monitor air quality throughout West Suffolk Monitoring for the pollutant Nitrogen Dioxide (NO_2) via a network of diffusion tubes. NO_2 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. Monitoring occurs in approximately 65 locations within the towns and villages of: • Brandon • Bury St Edmunds • Great Barton • Haverhill • Lakenheath • Mildenhall • Newmarket 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.	**Review** the applicability of NO_2 as a proxy for other pollutants and consider monitoring for other pollutants (e.g. particulates - PM_{10} or $PM_{2.5}$) where appropriate. **Review** locations of monitoring and react to any new information or concerns that may alter the monitoring locations. **Review** the need for continuous monitoring of NO_2.	Ongoing Ongoing Ongoing	Medium Low Low

Reporting of air quality levels Monitoring results are published on a yearly basis and compared to the Annual Mean Objective for NO_2 in an Annual Status Report, in a template as specified by the Department for Environment, Food & Rural Affairs (DEFRA). 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.	**Review** statutory reporting requirements and react accordingly. **Review** the need for publishing clearer or specific data where requested.	Ongoing Ongoing	Low Low
Declare Air Quality Management Areas and maintain Action Plans as necessary Air Quality Management Areas (AQMAs) are declared where the annual mean objective is consistently exceeded at relevant receptors. 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.	**Planned** to publish Air Quality Action Plans for the AQMAs in Great Barton and Sicklesmere Road. **Review** the need for the Newmarket AQMA following the completion of 2018 annual monitoring. **Review** the need for further AQMAs where monitoring results indicate this is necessary.	2018 2019 Ongoing	High Low Low

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)**
Promote zero Emission Electric Vehicles (EVs) to the general public and businesses 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. 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.	**Planned** to run further EV promotional events aimed at members of the public in partnership with local (West Suffolk) dealerships. **Review** the venue and timing of events to ensure maximum exposure to the widest audience. **Planned** to run EV promotional events aimed specifically at businesses, in tandem with the wider business events such as the West Suffolk Business Festival.	Yearly (Summer) Yearly Yearly (Autumn)	Medium Low Medium
Invest in Electric Vehicle charging infrastructure Standard 7kWh charging infrastructure is available to the public in the following West Suffolk owned car parks: • Ram Meadow, Bury St Edmunds • Parkway Multi-Storey Car Park, Bury St Edmunds	**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.	2018	Medium

• The Guineas, Newmarket • Ehringshausen Way, Haverhill 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.	**Planned** to install a rapid chargepoint in the centre of Bury St Edmunds with funding assistance from Highways England. **Aspire** to install rapid charging infrastructure in Newmarket public car parks. **Aspire** to install standard charging in public carparks in towns with no current provision (Mildenhall, Brandon and Clare)	Summer 2018 2018 / 2019 2018 / 2019	Medium Low Low
Work with Suffolk County Council Highways We regularly work with Suffolk County Council Highways, who have a designated contact for air quality.	**Planned** to continue working with Suffolk County Council in a proactive and positive manner, responding to consultations and requests where appropriate.	Ongoing	Low
Promote and provide grants for Electric Vehicles to West Suffolk businesses 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. A targeted campaign to local taxi firms has already been undertaken.	**Review** grants that are applicable to electric vehicles and promote new grants to businesses as and when they become available.	Ongoing	Low

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)**
Environmental Permitting Regulations 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.	**Review** the area periodically to identify any new businesses that may require Environmental permitting and issue where necessary. **Planned** to continue inspection duties at all permitted sites.	Ongoing Yearly	Low Low
Assess impact on air quality from new developments West Suffolk councils assess all planning applications to determine whether they require an air quality assessment, using the criteria within the EPUK document "*Land-Use Planning & Development Control: Planning For Air Quality"* to determine appropriate action. Bespoke actions are taken where an Air Quality Assessment identifies a potentially significant impact from or to developments.	**Planned** to continue reviewing all planning applications to assess their impact on air quality and take action where necessary.	Ongoing	Medium

Request Electric Vehicle charging points for new developments through the planning regime All major applications (in terms of planning – i.e. 10 or more dwellings or greater than 1000m^2 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. Currently we request: • 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	**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.	2018	Medium

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: • 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
…	…

Licensing and Regulatory Committee

Forest Heath District Council

Title of Report:	**West Suffolk Food Safety Service Plan 2018-2019**
Report No:	**LIC/FH/18/004**
Report to and date/s:	Licensing and Regulatory Committee - 2 July 2018
Portfolio holder:	Councillor Lance Stanbury Portfolio Holder for Planning and Growth **Tel:** 07970 947704 **Email**: lance.stanbury@forest-heath.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:	**The Committee is requested to note the contents of the report and support the delivery of the Food Safety Service Plan.**
Key Decision:	*Is this a Key Decision and, if so, under which definition?* No, it is not a Key Decision - ☒

Consultation:	• 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):	• 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 ☒ No ☐ • 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 ☐ No ☒
*Are there any **ICT** implications? If yes, please give details*	Yes ☐ No ☒
*Are there any **legal and/or policy** implications? If yes, please give details*	Yes ☒ No ☐ • 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 ☐ No ☒

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: *(all background papers are to be published on the website and a link included)*		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 Code[1] 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

Forest Heath & St Edmundsbury councils

West Suffolk

working together

Appendix A

West Suffolk
Food Safety Service Plan
2018/19

Date published: 17 May 2018	Version: Final

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/strategicplan.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)

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)**

2.4 Food Sampling Policy

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.

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

West Suffolk

working together

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	

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