

Notice of Meeting

Joint Public Protection Committee

A shared service provided by Bracknell Forest Council,
West Berkshire Council and Wokingham Borough Council

Monday, 19th March, 2018 at 7.00 pm

Venue: Wokingham Borough Council, Shute End, Wokingham,
RG40 1BN

To: Councillors Norman Jorgensen (Wokingham Borough Council), Michael Firmager (Wokingham Borough Council), Marcus Franks (West Berkshire Council), Emma Webster (West Berkshire Council), Nick Allen (Bracknell Forest Council) and Iain McCracken (Bracknell Forest Council)

Part I

Page No.

1 **Apologies**

To record any apologies for absence received.

2 **Minutes**

To approve the minutes of the previous meeting held on 12 December 2017.

1 - 10

3 **Declarations of Interest**

Any Member with a Disclosable Pecuniary Interest in a matter should withdraw from the meeting when the matter is under consideration, and should notify the Democratic Services Officer in attendance that they are withdrawing as they have such an interest. If the Disclosable Pecuniary Interest is not entered on the register of Members' Interests, the Monitoring Officer must be notified of the interest within 28 days.

4 **Notice of Public Speaking and Questions**

To note those agenda items which have received an application for public speaking.

A period of 30 minutes will be allowed for members of the public to ask questions submitted under notice.

The Partnership welcomes questions from members of the public about their work.

Subject to meeting certain timescales, questions can relate to general issues concerned with the work of the Partnership or an item which is on the agenda for this meeting. For full details of the procedure for submitting questions please contact Democratic Services.

Public Protection Partnership Agenda - Monday, 19 March 2018 *(continued)*

- 5 **Future Plan** 11 - 12
To detail future items that the Committee will be considering.
- 6 **Twyford Crossroads & Wokingham Town Centre Air Quality Action Plan (PP3320)** 13 - 80
To outline the requirements for an Air Quality Action Plan for Twyford Crossroads and Wokingham Town Centre to improve air quality with the Air Quality Management Areas (areas identified within Wokingham Borough Council where levels are failing to meet the Governments objectives for Nitrogen dioxide).
- 7 **Public Protection Partnership Strategic Assessment (PP3385)** 81 - 136
To inform the Committee on the outcomes of the first Strategic Assessment (SA) of the PPP and to agree the priorities and Control Strategy (CS) to deliver against these for the 2018-19 period. These documents have been developed to inform and direct our proactive project, intervention and enforcement activities as part of our adaptation of the National Intelligence Model.
- 8 **Public Protection Partnership Performance Report (PP3389)** Verbal Report
To provide a verbal update on current performance.
- 9 **Any other items the Chairman considers to be urgent**
- 10 **Date of Next Meeting**
Meetings have been scheduled for:
- 12 June 2018
 - 18 September 2018
 - 11 December 2018
 - 20 March 2019

Contact Officer:

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Note: These Minutes will remain DRAFT until approved at the next meeting of the Committee

JOINT PUBLIC PROTECTION COMMITTEE

Minutes of the meeting held on Tuesday, 12 December 2017

Wokingham Borough Council, Shute End, Wokingham, RG40 1BN

Present: Councillors Nick Allen, Dominic Boeck (Substitute) (In place of Marcus Franks), Norman Jorgensen, Iain McCracken and Emma Webster

Also Present: Paul Anstey (Head of Public Protection & Culture), Sean Murphy (Public Protection Manager), Stephen Chard (Principal Policy Officer), Clare Lawrence (Wokingham Borough Council) and Steve Loudoun (Chief Officer Environment & Public Protection)

Apologies for absence: Councillor Michael Firmager and Councillor Marcus Franks

PART I

29 Minutes of the Previous Meeting

The minutes of the meeting held on 19 September 2017 were approved as a true and correct record by the Committee and signed by the Chairman.

30 Declarations of Interest

There were no declarations of interest received.

31 Notice of Public Speaking and Questions

No notice had been received that members of the public wished to address the Committee on any of the agenda items.

There were no public questions submitted.

32 Future Plan

It was noted that since the last meeting, Paul Anstey had been promoted to the Head of Public Protection and Culture at West Berkshire Council. As a result, Sean Murphy would be leading the work on the Public Protection Partnership (the Partnership) and there was therefore a need to create additional capacity to backfill some elements of Sean's post to allow him to take on these additional duties.

Councillor Norman Jorgensen offered his congratulations to Paul on his promotion.

The Committee then reviewed the current version of its Forward Plan and made the following comments:

PP3320 – Air Quality Action Plan – while this item was specific only to Wokingham Borough Council, it still featured on the Forward Plan in line with the delegations made to the Partnership. Additional consultation would take place internally on the Action Plan, the outcome of which would be brought forward to a Special Joint Public Protection Committee in late January 2018 (date to be confirmed).

The Partnership's Strategic Assessment would also be brought forward to the Special January meeting. This assessment would help to set the priorities for the Partnership over the next three years. This work was being informed by extensive data collection and

JOINT PUBLIC PROTECTION COMMITTEE - 12 DECEMBER 2017 - MINUTES

analysis, and would be discussed in detail by Officers at the next JPPC Board Meeting being held in December 2017. The outcome of this would be shared with Members prior to the special meeting in January. Formal sign off of the Strategic Assessment was then scheduled for March 2018.

Sean Murphy explained that the Strategic Assessment would feed into the Control Strategy which was scheduled for discussion and approval at the meeting being held on 19 March 2018. Joint and local priorities would be formed and this Strategy would be refreshed on an annual basis.

The Partnership's Performance Report would also be discussed in March 2018.

It was noted that the Lead Member for each of the Forward Plan items would be amended to the Chairman of the JPPC, with the exception of the Air Quality Action Plan as this was specific to Wokingham Borough Council.

Resolved that:

- The Forward Plan be noted, subject to the amendments described being made.
- A Special JPPC would be arranged for late January 2018.

33 Public Protection Partnership Budget 2018/19

The Committee considered the report (agenda item 6) which set out the draft Revenue Budget for 2018/19, including fees and charges.

Sean Murphy explained that the Inter-Authority Agreement (IAA) between the three local authorities set out the functions that were delegated to the Joint Committee under the terms of the agreement. In order to deliver these functions and the key priorities of the Partnership, the local authorities were required, on an annual basis, to allocate a budget to the Joint Committee. That budget was proposed to the Joint Committee together with a proposed schedule of fees and charges. This was an annual process which would culminate in the fees and charges for the forthcoming financial year being recommended to the Council meeting of each of the three authorities for approval. The IAA required that this process be undertaken by 30 November but this was complicated by the need to proceed through three different committee structures.

The proposed net revenue budget for 2018/19 would be an increase to £3.395m. This had been calculated taking into account the annual cost of living rise of 1%, an increase in employer pension contributions to the Royal Berkshire Local Government Pension Scheme of £84k and incremental rises to the value of £69k. It was proposed that the budget would be divided amongst the three local authorities as per the following table:

Authority	Agreed Percentage	Budget Allocation
Bracknell Forest	26.25	£891,100
West Berkshire	39.95	£1,356,200
Wokingham	33.80	£1,147,400

The fees and charges were detailed within the appendices to the report.

Councillor Norman Jorgensen queried whether the budget allocations were built into budget pressures at a local level. Clare Lawrence advised that for Wokingham, this had not as yet been fed into the Medium Term Financial Plan, however Finance Officers had been made aware. She added that it was the intention when setting the Joint Committee's budget for the following financial year to do so at an earlier stage and link it with the budget build and budget setting processes of the individual councils. Members were reminded that the Joint Committee was still in its first year of operation. Councillors Jorgensen and Iain McCracken agreed with the need to conduct this work at an earlier

JOINT PUBLIC PROTECTION COMMITTEE - 12 DECEMBER 2017 - MINUTES

stage and expressed their preference that the Partnership's budget be prepared by October from 2018 onwards.

Steve Loudoun explained that at Bracknell, inflationary rises had been assumed, as with other service areas, and the increase to this budget was in line with expectations.

Paul Anstey added that this was also the case in West Berkshire. The growth in the budget was as expected and was not considered to be a budget pressure as the 'envelope' of costs was unchanged. Sean Murphy stated that there were no changes proposed to supplies and services budgets.

Councillor McCracken queried whether there was a need to modify the IAA to reflect an earlier date for budget sign off. Sean Murphy explained that there was scope for the JPPC to adjust dates, the IAA stated that approval was required 'by 30 November, unless otherwise agreed by the councils'.

Sean Murphy confirmed that the Joint Committee's recommendations from this meeting would be forwarded to the Heads of Finance of each of the three local authorities.

Sean Murphy then explained that the mechanism for meeting the costs of pension contributions differed between the local authorities and there was a need to ensure that there was no financial double counting for the members of staff TUPE'd into the Partnership and that payments were appropriately accounted for.

The Joint Committee then turned to the proposed fees and charges. Sean Murphy explained that two sets of fees and charges were proposed, one for West Berkshire and Wokingham, and the other for Bracknell. This reflected the fact that licensing fees had yet to be integrated and this was a priority for the coming year. There was therefore a variance in some fees and charges.

Paul Anstey added that efforts had been made to align charges where possible and expedient to do so. However, in some areas there were complexities to resolve and the cost recovery model had created potential issues for some fees and charges.

A programme of work to identify cost recovery was being implemented, this involved a consistent assessment of the time undertaken on different activities and services, and then multiplying that with the hourly rate for the different functions. It was proposed that the outcome of this work would be presented to the three Licensing Committees to consider implementing the cost recovery model. This could result in different rates being set in the different areas but while this would be inconsistent it was not insurmountable. Paul Anstey did however confirm that it was the intention to align fees and charges wherever possible.

Paul Anstey went on to explain that each local authority could decide to subsidise any particular licence to seek to address any local concerns.

Clare Lawrence highlighted that some local authorities in other areas had reduced their fees, but it needed to be recognised that they used different models. Reading Borough Council was an example of this, they had reduced their fees but had elected to subsidise their fees and they did not have a set approach to cost recovery. It was noted that such inconsistencies could be used by members of different trades in order to challenge fees and charges in their home authority.

It was further noted that enforcement options were open to the Partnership to resolve any issues with obtaining payment or unregulated activity. There were currently no issues with the latter. However, Paul Anstey advised that complaints had been received in relation to street trading consents and in response, a wider set of options would be provided.

JOINT PUBLIC PROTECTION COMMITTEE - 12 DECEMBER 2017 - MINUTES

An appropriate charge needed to be levied to licence holders. Councillor Emma Webster stated that this needed to be fair when viewed by residents. Residents would not expect businesses i.e. Hackney Carriages to be subsidised. She felt that the fees and charges outlined were reasonable and appropriate, and proposed they be recommended to the three local authorities.

Bracknell Forest Borough Council Fees & Charges

Members considered specifically the proposed fees and charges for Bracknell. They noted those fees and charges which were prescribed by law and could not be altered by local authorities. Existing discretionary fees and charges had been increased by approximately 3% rounded. Steve Loudoun questioned the publication of percentage increases as this could be misleading when compared to the actual rise in cost.

It was pointed out that references to 3% increases to fixed penalty notices related to dogs were incorrect as this charge was as prescribed by law. This would be corrected.

Steve Loudoun pointed out that the reference made to the disabled facilities support service needed to be removed as this was no longer relevant. Sean Murphy agreed to make this change.

West Berkshire Council and Wokingham Borough Council Fees & Charges

As in Bracknell, discretionary fees and charges had been increased by approximately 3% rounded. Cost recovery work identified areas where costs could have increased significantly but there was a risk in doing so and therefore inflationary rises were instead recommended.

Steve Loudoun queried whether there was scope for one of the councils to offer to discount standard fees set by the Partnership. It was felt that it would be sensible to allow this level of flexibility in order to meet local needs. However, Paul Anstey stated that a level of income was assumed from fees and charges, individual discounts would need to be covered off by the discounting council.

Paul Anstey further explained that Officers would continue to work to identify and, where possible, resolve discrepancies in fees and charges across the three areas. Where not possible, the risks needed to be recognised, monitored and managed as necessary.

Councillor Jorgensen agreed to the proposed approach of implementing the 3% increases for 2018/19, with a review then conducted as described on the potential to charge on a cost recovery basis.

Councillor Webster questioned why the Partnership should not move to cost recovery, at least in some areas, from 2018/19 as she felt this would be preferable to waiting until 2019/20. Clare Lawrence advised that while this approach could be taken, full analysis would take time and would result in a phased approach to cost recovery which could give cause for confusion. Paul Anstey agreed that the Partnership was not yet in a position for a fully accurate understanding of cost recovery or a consistent approach across the three local authorities. Pursuing cost recovery on this basis would leave the Partnership vulnerable to complaints. A consistent approach and consistent figures were recommended across the Partnership. The work involved would sit outside of the budget setting process and changes to budgets could be requested in year as a result.

Councillor McCracken accepted the difficulties of implementing cost recovery in 2018/19, but stated that this approach should be strived for from 2019/20. Paul Anstey agreed that this would be the objective and would be a high priority area moving forward.

In summarising the view of the Committee, Councillor Jorgensen stated agreement with an inflationary rise of 3% for discretionary fees and charges, on the understanding that

JOINT PUBLIC PROTECTION COMMITTEE - 12 DECEMBER 2017 - MINUTES

detailed work would be undertaken with a view to implementing the cost recovery model from 2019/20.

However, Members recognised the detailed level of work that this would require and queried those areas to prioritise. In addition, they queried if a phased approach would be acceptable. Paul Anstey suggested that work should commence with taxi licensing. Officers would aim to present aligned proposals on this to the Joint Committee in June 2018. Councillor Jorgensen highlighted the need to incorporate consultation.

The report also set out a proposed adjustment to the West Berkshire and Wokingham Dog Boarding licence fee for 2017/18. The animal boarding fee for home dog boarding for 2017/18 for West Berkshire and Wokingham was set at £371. This was a universal fee based on full cost recovery at the agreed rate of £53 per hour. This included consideration of the licence application and two visits per annum to each licence holder (there were currently 36 licence holders in West Berkshire and 33 in Wokingham). This represented an increase of £198 on the 2016/17 fee and had been a significant concern for those renewing their licence. It was therefore proposed that while the principle of cost recovery should be upheld, the fees should be reduced in year in accordance with the rationale described in the report. If approved, the varied fee would be first licence application - £265 and a renewal fee of £185. It was also proposed to move to a single visit per annum and this was seen as acceptable by Officers as the process largely concerned renewals and was also seen as appropriate based on the time that was taken. This renewal fee would constitute a £12 per annum increase when compared to the 2016/17 fee.

Paul Anstey explained that the fee setting process was always based on the level of work it required to process an application. Cost increases had also been taken into account. This included attendance at inspections/visits by a vet which was in line with legislative requirements. However, as described, the fee for full cost recovery was a concern for members of the trade.

Paul Anstey reiterated that the principle of cost recovery needed to be protected and he felt that the revised costs would achieve this without impacting on the ability of dog boarding businesses to operate. Sean Murphy added that the fee for a second visit, i.e. for non-compliance, would be set based on full cost recovery.

Councillor Jorgensen agreed that the cost recovery route was the appropriate way forward and should be pursued, with an acceptance that a level of concern and a degree of lobbying would follow. However, he also raised the need for careful consideration to be given should particularly high increases be proposed in order to meet cost recovery in full. The Partnership needed to be satisfied that charges were appropriate.

It was noted that Bracknell already operated on a single visit per year basis. However, their renewal fee of £119 was lower than that proposed in West Berkshire and Wokingham. Paul Anstey explained that the fees and charges for this activity would be compared and closer alignment considered for future years. Clare Lawrence queried if this was based on cost recovery and Sean Murphy explained that Bracknell's fee took account of a changed process.

Councillor Webster queried whether a move to a single annual visit would be sufficient. Steve Loudoun explained that in Bracknell, when the fee had been set, past compliance levels had been considered alongside assessing the risks of reducing activity and the view had been taken that a lesser inspection frequency could be given to this work based on the available resource. Paul Anstey commented that it was the Officer view that the Partnership had appropriate mechanisms in place to act on non-compliance, i.e. the second visit referred to. Councillor Webster requested that over the course of the coming

JOINT PUBLIC PROTECTION COMMITTEE - 12 DECEMBER 2017 - MINUTES

year, the number of second visits required should be carefully logged to inform fees in this area for 2019/20 and beyond.

Resolved that:

- The draft Revenue Budget including fees and charges be supported as set out in the report.
- The sums set out in paragraph 6.3 of the report, indicating the revenue budget of the three local authorities, be recommended to the three Council meetings along with the relevant fees and charges schedule.
- The West Berkshire and Wokingham 2017/18 fee for animal boarding be varied as set out in paragraph 5.4 of the report.

34 Public Protection Partnership Community Fund Applications

The Committee considered the report (agenda item 7) which sought a decision on the applications made to access the Public Protection Partnership Community Fund.

The Fund was established by virtue of the Committee's decision to implement the policy on the Asset Recovery Incentivisation Scheme (ARIS) on 14 March 2017, when it was agreed that the Committee would determine all grant applications. The size of the Fund was capped, as agreed by the Committee, at 20% of the total Proceeds of Crime Act (POCA) reserve.

Paul Anstey advised that a number of applications had been received and this process had proved to be positive. After reviewing the applications, judging them against the general principles for allocating from the Fund and considering community benefits, eight applications were recommended for approval. These eight bids totalled approximately £53k and were from organisations across the three local authority areas.

Councillor Iain McCracken asked if the accounts of the applicants had been reviewed prior to granting approval. Paul Anstey confirmed that this had been undertaken and the accounts appeared to be sound for the types of organisations involved. However, third party due diligence checks would also be undertaken and any concerns would be reported back to the Committee if necessary with the potential to reconsider decisions.

In response to a query from Councillor Norman Jorgensen, Paul Anstey confirmed that applicants had been made aware that this was one-off funding for one year. However, the organisations would be free to reapply in future years and while a record would be kept of previous awards from the Fund, each application would be considered on its own merits.

Paul Anstey proposed to Members that the eight recommended bids be approved as outlined below. He highlighted that the award to Project F had been reduced from the £10,422 in the report to £7,500 (the upper limit for applications):

Bid no	Type of organisation	Project summary	Proposal	Nos to benefit	Cost of project	Amount applied for	Decision
B	Charity	Drop-in centre for the homeless, open 2 days a week throughout the year.	Running costs and overheads of the drop-in for 12 months.	228 beneficiaries and 24 volunteers.	£7,010	£7,010	Approved, subject to the due diligence process to confirm numbers, costs, any reserves held by

JOINT PUBLIC PROTECTION COMMITTEE - 12 DECEMBER 2017 - MINUTES

Bid no	Type of organisation	Project summary	Proposal	Nos to benefit	Cost of project	Amount applied for	Decision
							organisations etc as with each bid.
D	Community Interest Company	Provides free of charge courses that support the recovery of anyone living with a wide variety of mental health challenges.	Deliver courses that provide the opportunity for students to develop better self-confidence, self-esteem and feel more connected to their community.	150 people directly with mental health challenges in 16/17. They aimed to be supporting up to 250 by the end of 2018.	£60,000	£7,500	Approved
F	Community/voluntary group	Multi-purpose garden for community use. Funding for onsite works and activities across a number of partners.	Salary costs equivalent to 1 day per week for 2 years; material and tool replacement, management costs and communication	An estimated 20 people participate annually. Over 1300 volunteers annually.	£10,422	£7,500	Bid reduced to £7.5k and approved. To clarify via due diligence if project could proceed on the lower sum.
J	Charity	Provision for young people for various activities, i.e. recreation, IT, education and counselling.	To run weekly sessions with young people specifically for those who had been	20	£3,750	£3,750	Approved

JOINT PUBLIC PROTECTION COMMITTEE - 12 DECEMBER 2017 - MINUTES

Bid no	Type of organisation	Project summary	Proposal	Nos to benefit	Cost of project	Amount applied for	Decision
			banned from regular youth club sessions.				
O	Charity	Provision of free, independent and confidential advice to residents to help them overcome issues.	To participate in Scam Awareness month in July 2018. Would include publicity and education activities with community organisations and Thames Valley Police.	Previous scam awareness campaigns had achieved a media reach of 756,480 targeted across the area.	£5,665	£5,665	Approved
P	Charity	To provide free legal advice to victims of domestic violence and abuse throughout Berkshire.	To meet the costs of a part time co-ordinator who would promote services, increase the number of solicitors, arrange free legal advice sessions and raise awareness.	200 adults annually with approx 300 children.	£16,700	£3,000	Approved
R	Charity	Provision for young people in the local	Mobile youth bus. Fund to cover staff	100 young people, the general public,	£7,231	£6,489	Approved. Noted as a relatively small cost

JOINT PUBLIC PROTECTION COMMITTEE - 12 DECEMBER 2017 - MINUTES

Bid no	Type of organisation	Project summary	Proposal	Nos to benefit	Cost of project	Amount applied for	Decision
		area.	and vehicle running costs.	community agencies and businesses.			and an initiative that could be replicated in other areas if successful.
U	Community Interest Company	Provision of preventative support and advice to socially excluded, disadvantaged and vulnerable (18+) clients with multiple and complex needs.	Bespoke courses focusing on employment, empowerment and education for offenders, ex-offenders or those at risk of offending.	To run 2 courses with a maximum of 10 on each, totalling 20.	£7,500	£7,500	Approved

Post the Committee's decisions, it was noted that the projects were located as follows:

B, F, R: Bracknell

D, O: West Berkshire

J: Wokingham

P: based in West Berkshire, but covers all Berkshire

U: Bracknell and Wokingham

Members also took the opportunity to praise some of the bids that were not approved. I.e. Project I – help towards building a new scout hut. Paul Anstey acknowledged that this and other bids would be for good causes, but they fell outside of the Home Office guidance/criteria for this funding for crime prevention and community safety.

In terms of the overall bids, it was noted that the highest number came from Bracknell, followed by West Berkshire and then Wokingham. Paul Anstey acknowledged that there was a need to consider additional publicity in order to promote future bids from across the three areas. However, it was felt that the appropriate organisations had been involved as part of PR activity.

There was an expectation that further bids would be submitted for funding. Councillor Jorgensen raised the need to be clear with applicants on the timeframes for submitting bids, he queried whether it would be appropriate to restrict this to an annual bidding round. Paul Anstey felt that greater flexibility could be allowed for this Fund as opposed to the approach for separate Council grants and the timing of permissions could be based on the level of the reserve at any particular time rather than delaying decisions. He felt this was particularly important as the profile of the Fund had been highlighted and

JOINT PUBLIC PROTECTION COMMITTEE - 12 DECEMBER 2017 - MINUTES

bids were still being received. Alternatively, a future date could be set for determining the next bidding round alongside appropriate publicity. This latter approach would need to involve liaison with bidders to ensure that set timeframes would not hamper the delivery of their particular projects.

Paul Anstey also raised the importance of positive publicity continuing on the use of the POCA reserve. Councillor Jorgensen accepted these points, but remained concerned at the time that could be spent determining applications if they were considered at every meeting. He therefore suggested that the JPPC consider applications twice annually. Steve Loudoun commented that if the burden became too great then perhaps this role could be delegated to a sub-committee.

In terms of moving the approved bids forward, the third party due diligence checks would be undertaken prior to funds being paid out. This was aimed for completion by January 2018.

Resolved that the bids would be approved as per the minutes, subject to the completion of the due diligence process.

35 Any other items the Chairman considers to be urgent

The Chairman did not raise any further urgent items.

36 Date of next meeting

Special JPPC scheduled for Tuesday 30 January 2018, 7pm at the Wokingham Borough Council offices.

(The meeting commenced at 7.00pm and closed at 9.20pm)

CHAIRMAN

Date of Signature

Forward Plan for the Joint Public Protection Committee

12 June 2018

Reference	Item	Purpose	Decision Body	Month/Year	Other	Officer and Contact No	Directorate	Lead Member	Part II	Call In
PP3389	Public Protection Partnership Performance Report	To consider Public Protection Partnership Performance Report for 2017/18	JPPC	12/06/2018	20/04/2018	Anna Smy anna.smy@westberks.gov.uk	Economy and Environment	Cllr Norman Jorgensen – Wokingham Borough Council	No	No
PP3392	Public Protection Partnership Key Licensing Fees and Charges calculation methodology	To consider the methodology and principals behind PPP wide Licensing Fees and Charges for 2019/20 to allow adequate consultation with trade bodies	JPPC	12/06/2018	16/03/2018	Sean Murphy Sean.Murphy@westberks.gov.uk	Economy and Environment	Cllr Norman Jorgensen – Wokingham Borough Council	No	Yes
PP3393	Public Protection Partnership implementation plan for General Data Protection Regulations	To consider the PPP approach to managing the implications and risks of GDPR	JPPC	12/06/2018	20/04/2018	Emma Coles emma.coles@westberks.gov.uk	Economy and Environment	Cllr Norman Jorgensen – Wokingham Borough Council	No	Yes
PP3394	Public Protection Partnership Caravan Licensing Policy	To agree the PPP approach to Caravan Licenses and enforcement policy	JPPC	12/06/2018	16/03/2018	George Lawrence George.lawrence@westberks.gov.uk	Economy and Environment	Cllr Norman Jorgensen – Wokingham Borough Council	No	Yes

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Twyford Crossroads & Wokingham Town Centre Air Quality Action Plan – Report

Committee considering report: Joint Public Protection Committee
Date of Committee:
Date agreed by Joint Management Board:
Report Author: Anna Smy

1. Purpose of the Report

1.1. To outline the requirements for an Air Quality Action Plan for Twyford Crossroads and Wokingham Town Centre to improve air quality with the Air Quality Management Areas (areas identified within Wokingham Borough Council where levels are failing to meet the Governments objectives for Nitrogen dioxide).

2. Recommendation(s)

2.1. That the Committee consider the Action Plan and agree to the PPP working with Wokingham Borough Council officers to achieve these

3. Implications

Financial: There is provision within the budget for the continuous monitoring unit (situated in Peach Street, Wokingham) and a number of diffusion tubes located across the Air Quality Management Areas. Additional funding of £10k has been provided by Wokingham Borough Council and will be used for the purchase and installation of a smaller continuous monitoring unit within Twyford. There is no budget currently to support the actions outlined within the Action Plan, however the PPP will ensure it applies for any available government funding and support other departments in their bids (with the provision of data and public health improvements).

Policy: The Air Quality Policy and Government Policy require action to be taken when levels of pollution exceed legal limits. Any work will be undertaken in line with PPP and Wokingham Borough Council Policies. Some of the actions outlined in the Plan may require changes to existing Wokingham Borough Council Policy or the introduction of new ones. Air quality is identified as a Strategic Priority for the Public Protection Partnership.

Personnel:	Air Quality work takes up 10-15% of the EQ Team work (across the Public Protection Partnership) with 1 lead officer (Senior EHO) focussing on Action Plan development and oversight, 1 Senior EHO focussing on Air Quality links with Planning and Public Health and a number of others helping with monitoring (collection of the diffusion tubes which takes 3 days a month)
Legal:	The local authority responsibility for implementation of Part IV of the Environment Act 1995 falls to the PPP service. Monitoring and reporting (annually to DEFRA) on Air Quality is a key function although how this is undertaken is not directly specified. We have a statutory responsibility to declare an Air Quality Management Area where levels exceed the Government objectives and following the declaration we are required to produce an Air Quality Action Plan.
Risk Management:	There are no specific risks identified in this report, there could be a challenge if we fail to demonstrate we have measures to help improve air quality.
Property:	No implications.
Other:	None

4. Other options considered

Within the Action Plan itself a number of options for improving air quality were considered and those which were ruled out are listed within the document. The other option is to not produce an action plan and risk the consequences. This is not appropriate as not only is this a statutory requirement it is in place to help improve public health.

5. Executive Summary

- 5.1. The Inter-Authority Agreement (IAA) between the Councils sets out the functions that are delegated to the Joint Committee under the terms of the agreement.
- 5.2. The IAA also identifies the key priority areas identified for the service are community protection; protection and improving health; protection of the environment; supporting prosperity and economic growth and the delivery of effective and improved service.

6. Conclusion

- 6.1. The Committee agree to adopt the proposed Action Plan for Twyford and Wokingham.
- 6.2. The Committee agree to support the work of the PPP in progressing the actions within the Action Plan with our colleagues and Members within Wokingham Borough Council.

Appendices:

Appendix A – Supporting Report

Appendix B – Air Quality Action Plan – Twyford and Wokingham Town Centre

Appendix C – Berkshire Public Health Team – JSNA air quality report

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Appendix A

Public Protection Partnership Performance Update - Supporting Information

1. Introduction/Background

- 1.1 The Environment Act 1995 introduced a system of Local Air Quality Management which requires local authorities to regularly review and assess air quality within their areas. If monitoring indicates that levels of nitrogen dioxide (NO₂) are at or near specified levels, a detailed assessment must take place.
- 1.2 Monitoring that took place in 2012 and 2013 identified two areas in Wokingham Borough with slightly elevated levels of nitrogen dioxide. A Detailed Assessment of these areas was undertaken (this included modelling based on traffic data and taking into account known planning developments such as new Station Link Road) and identified a small number of properties within the vicinity of Tywford Crossroads and Wokingham Town Centre where the annual average nitrogen dioxide objective is likely to be exceeded. Monitoring in 2014, 2015 and 2016 has confirmed levels have continued to exceed the level of 40µg/m³ (with an annual average for Wokingham between 40 and 52 µg/m³ and for Twyford between 43 and 54µg/m³).
- 1.3 The Council takes its responsibilities very seriously, and therefore declared two Air Quality Management Areas to ensure that we can monitor and seek to improve the situation. This ensured that we comply with legislation that required us to take appropriate action.

2. Implications

- 2.1 Once the declaration was made the Council must prepare an Action Plan for each location, and this must be submitted to DEFRA within 12-18 months of declaring the AQMA. The action plan addresses how the Council will work towards reducing the levels of nitrogen dioxide within the AQMAs. In addition this should also ensure that decisions made by Wokingham Borough Council do not result in an increase in pollution levels in these areas.
- 2.2 This Action Plan is required to manage and reduce air quality in the identified area and will require multi-disciplinary input from a range of Council departments and stakeholders. The main reason for the air quality issues is from road transport so the Action Plan includes actions such as improved traffic signalling or infrastructure projects many of which are already in place or being looked into.
- 2.3 There are strong links between exposure to poor air quality and health impacts. Work with the Berkshire Public Health team has provided more

local data for inclusion within the Wokingham Borough Council Joint Strategic Needs Assessment (Appendix C). Local measures to improve air quality will have a benefit to the health and well being of residents. There are co-benefits from measures within the plan such as encouraging active travel amongst residents.

- 2.4 There may be financial implications for the PPP Service in managing the action plan, implementing measures outlined and continuing to monitor the situation (increased costs to monitor real-time data in Twyford). This may also be an opportunity for Wokingham Borough Council in that it can strengthen the argument of need when applying for funding for projects (outlined in the plan).

3 Options Considered

- 3.1 The legislation outlined above requires an action plan to be created in a prescriptive format, the only option is to create one or risk formal challenge. A number of options within the plan were considered alongside existing measures already in place within Wokingham Borough Council strategies.
- 3.2 At the initial public workshop everyone attending had an opportunity to make reasonable suggestions about tackling the issue of poor air quality within the two air quality management areas.
- 3.3 Whilst the wording was refined and some actions amalgamated overall the majority of these were included within the action plan which went out to public consultation. These are set out in Appendix B of this report (Chapter 7 of the Action Plan, a resume of the responses) and Chapter 8 outlines the reasons for not including options.
- 3.4 In addition some measures which were originally set out as area specific were moved to more generic measures, such as Residential Travel Planning

4 Options for Consideration by Joint Committee

- 4.1 Agree the Air Quality Action Plan for Wokingham Town Centre and Twyford Crossroads.
- 4.2 Refuse the proposed Plan.
- 4.3 Amendment to the wording within the Plan by Wokingham BC members only and agree.

5 Proposals

- 5.1 To agree the Air Quality Action Plan and PPP officers will then submit to DEFRA .

6 Conclusion

6.1 The Environmental Quality Team will now work with colleagues within Wokingham Borough Council, Ward Members, Town Councils, local interest/business groups and local residents to improve air quality.

6.2 Reviews of the actions will be undertaken and a formal annual summary of progress will be included within the Annual Status Report which is submitted to DEFRA.

7 Consultation and Engagement

7.1 Since developing the draft action plan we have held a number of internal officer meetings with representatives from:

- Environmental Health
- Public Health (WBC and Berkshire Teams)
- Highways and Transport (Transport Planning, Active Travel, Travel Planning, Street Works, Development Management, and Highway Assets Teams)
- Transport Policy
- Planning Policy Growth and Delivery
- Development Control
- Wokingham Town Centre Regeneration Management
- PR / Communications

7.2 External public consultation through the Wokingham Borough Council website took place from 15/06/2017 to 28/07/2017, 23 responses were provided and attached as appendix D, the comments where applicable have been included in the final document.

7.3 Further meetings with Transport Policy on 28/09/2017 and internal officer meeting on 13/11/2017, as well as 2 members on 13/11/2017, the Plan has also been shared with the Wokingham Borough Council Environment Leadership Team.

Background Papers:

Air Quality Management Area (Twyford and Wokingham)
National Air Quality Strategy – NO₂
Local Transport Plan 3 (2011-2026) – Wokingham Borough Council

PPP Strategic Aims and Priorities Supported:

The proposals will help achieve the following Public Protection Partnership aims as stated in the Inter Authority Agreement:

- 1 – Community Protection
 - 2 – Protecting and Improving Health
 - 3 – Protection of the Environment
 - 4 – Supporting Prosperity and Economic Growth
 - 5 – Effective and Improving Service Delivery
-

Officer details:

Name: Anna Smy
Job Title: Team Manager – Environmental Quality
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E-mail Address: anna.smy@westberks.gov.uk

Equality Impact Assessment – Stage One

We need to ensure that our strategies, policies, functions and services, current and proposed have given due regard to equality and diversity as set out in the Public Sector Equality Duty (Section 149 of the Equality Act), which states:

- “(1) A public authority must, in the exercise of its functions, have due regard to the need to:*
- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;*
 - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; This includes the need to:*
 - (i) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;*
 - (ii) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;*
 - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it, with due regard, in particular, to the need to be aware that compliance with the duties in this section may involve treating some persons more favourably than others.*
- (2) The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.*
- (3) Compliance with the duties in this section may involve treating some persons more favourably than others.”*

The following list of questions may help to establish whether the decision is relevant to equality:

- Does the decision affect service users, employees or the wider community?
- (The relevance of a decision to equality depends not just on the number of those affected but on the significance of the impact on them)
- Is it likely to affect people with particular protected characteristics differently?
- Is it a major policy, or a major change to an existing policy, significantly affecting how functions are delivered?
- Will the decision have a significant impact on how other organisations operate in terms of equality?
- Does the decision relate to functions that engagement has identified as being important to people with particular protected characteristics?
- Does the decision relate to an area with known inequalities?
- Does the decision relate to any equality objectives that have been set by the council?

Please complete the following questions to determine whether a full Stage Two, Equality Impact Assessment is required.

What is the proposed decision that you are asking the Committee to make:	To approve the Air Quality Action Plan for Twyford Crossroads and Wokingham Town Centre
Summary of relevant legislation:	Part IV of the Environment Act 1995
Does the proposed decision conflict with any of the partnerships key objectives?	No
Name of assessor:	Anna Smy
Date of assessment:	26/09/2017

Is this a:		Is this:	
Policy	No	New or proposed	Yes
Strategy	Yes	Already exists and is being reviewed	No
Function	No	Is changing	No
Service	No		

1. What are the main aims, objectives and intended outcomes of the proposed decision and who is likely to benefit from it?	
Aims:	To set out how the PPP will work towards reducing levels of NO ₂ within Twyford and Wokingham to meet legal limits.
Objectives:	To work with colleagues at Wokingham Borough Council on a number of measures to improve air quality in Twyford and Wokingham.
Outcomes:	Demonstrate reduction in NO ₂ levels within the identified Air Quality Management Areas.

	Demonstrate these improvements have not had a detrimental effect on the air quality in nearby and adjacent areas as a result of the actions.
Benefits:	Improved air quality in both Twyford and Wokingham with improved public health and wellbeing to residents.

2. Note which groups may be affected by the proposed decision. Consider how they may be affected, whether it is positively or negatively and what sources of information have been used to determine this.
 (Please demonstrate consideration of all strands – Age, Disability, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion or Belief, Sex and Sexual Orientation.)

Group Affected	What might be the effect?	Information to support this
Age	Long term health implications of living with poor air quality	JSNA – Wokingham Public Health information
Disability	Long term health implications of living with poor air quality	JSNA – Wokingham Public Health information
Gender Reassignment	None	
Marriage and Civil Partnership	none	
Pregnancy and Maternity	Long term health implications of living with poor air quality	JSNA – Wokingham Public Health information
Race	None	
Religion or Belief	None	
Sex	None	
Sexual Orientation	None	

Further Comments relating to the item:

3. Result

Are there any aspects of the proposed decision, including how it is delivered or accessed, that could contribute to inequality?	Yes
Please provide an explanation for your answer: Measures outlined in the report are determined to reduce pollution levels in specific areas. If not monitored and evaluated effectively we could cause more issues elsewhere. There needs to be behavioural change alongside physical measures. Buisnesses may believe they are being affected by some of the proposals if say parking is impacted (reducing customer levels)	
Will the proposed decision have an adverse impact upon the lives of people, including employees and service users?	No
Please provide an explanation for your answer: The template is designed to capture information and does not influence decision making.	

If your answers to question 2 have identified potential adverse impacts and you have answered 'yes' to either of the sections at question 3, or you are unsure about the impact, then you should carry out a Stage Two Equality Impact Assessment.

If a Stage Two Equality Impact Assessment is required, before proceeding you should discuss the scope of the Assessment with service managers in your area. You will also need to refer to the [Equality Impact Assessment guidance and Stage Two template](#).

4. Identify next steps as appropriate:	
Stage Two required	No – some individual measures will require their own equality impact assessment to be carried out
Owner of Stage Two assessment:	
Timescale for Stage Two assessment:	

Name: Anna Smy

Date:20/11/2017

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**WOKINGHAM
BOROUGH COUNCIL**

Wokingham Borough Council Air Quality Action Plan

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

March 2018

Wokingham Borough Council

Local Authority Officer	Suzanne McLaughlin
Department	Environmental Health
Address	Public Protection Partnership, Council Offices, Shute End, Wokingham, Berkshire, RG40 1BN
Telephone	0118 974 6000
E-mail	Environmental.health@wokingham.gov.uk
Report Reference number	AQAP(T&W)2018
Date	March 2018

1 Executive Summary

This Air Quality Action Plan (AQAP) has been produced as part of our statutory duties required by the Local Air Quality Management framework. It outlines the action we will take to improve air quality in Wokingham Borough Council (WBC) between 2017 – 2026.

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

The annual health cost to society of the impacts of particulate matter alone in the UK is estimated to be around £16 billion³. Wokingham Borough Council is committed to reducing the exposure of people in the Borough to poor air quality in order to improve health.

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

- Alternatives to private vehicle use
- Freight and delivery management
- Policy guidance and development control
- Promoting low emission transport
- Promoting travel alternatives
- Public information
- Transport planning and infrastructure
- Traffic management

Our priorities are in Twyford are sustainable travel, alternative vehicle routes and access to the railway station. Our priorities in Wokingham are sustainable travel and provision of distributor roads.

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

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

Responsibilities and Commitment

This AQAP was prepared by the Environmental Quality Team of the Public Protection Partnership on behalf of the unitary authority Wokingham Borough Council with the support and agreement of the following officers and departments:

- Environmental Health
- Public Health (WBC and Berkshire Shared Teams)
- Highways and Transport (Transport Planning, Active Travel, Travel Planning, Street Works, Development Management, and Highway Assets Teams)
- Planning Policy (Growth and Delivery)
- Development Control
- Wokingham Town Centre Regeneration Management
- PR / Communications

Once this draft AQAP is completed it will be taken to the Joint Public Protection Committee for approval.

Once implemented this AQAP will be subject to an annual review, an appraisal of progress and reporting to the Joint Public Protection Committee.

Progress each year will be reported in the Annual Status Reports (ASRs) produced by Wokingham Borough Council, as part of our statutory Local Air Quality Management duties.

If you have any comments on this AQAP please send them to:

Address: Environmental Quality Team, Public Protection Partnership, Council Offices, Shute End, Wokingham, Berkshire, RG40 1BN

Telephone: 0118 974 6000

Email: environmental.health@wokingham.gov.uk

Table of Contents

1	Executive Summary	i
	Responsibilities and Commitment	ii
2	Introduction	1
3	Summary of Current Air Quality in Wokingham Borough Council	3
	Local Priorities and Challenges for Wokingham Borough were identified as:	3
4	Wokingham Borough Council’s Air Quality Priorities	4
4.1	Public Health Context	4
4.2	Planning and Policy Context.....	4
4.3	Source Apportionment.....	6
4.4	Required Reduction in Emissions.....	7
4.4.1	Twyford Crossroads	7
4.4.2	Wokingham Town Centre.....	8
4.5	Key Priorities	9
5	Development and Implementation of Twyford Crossroads and Wokingham Town Centre AQAP	10
5.1	Consultation and Stakeholder Engagement.....	10
5.2	Steering Group.....	11
6	AQAP Measures	13
7	Appendix A: Response to Consultation	24
8	Appendix B: Reasons for Not Pursuing Action Plan Measures	26
9	Appendix C: Twyford Crossroads AQMA	28
10	Appendix D: Wokingham Town Centre AQMA	29
11	Glossary of Terms	30
12	References	31

List of Tables

Table 4.1 – Twyford reductions in NO₂ concentrations and NO_x emissions required 11

Table 4.2 – Wokingham Town Centre reductions in NO₂ concentrations and NO_x emissions required

Table 5.1 – Consultation Undertaken

Table 6.1 - Air Quality Action Plan Measures for Twyford Crossroads

Table 6.2 - Air Quality Action Plan Measures for Wokingham Town Centre

Table 6.3 Air Quality Action Plan Measures for Wokingham Borough - Generic/Borough wide

List of Figures

Figure 1 – AQAP and its links with other WBC Plans and Strategies

2 Introduction

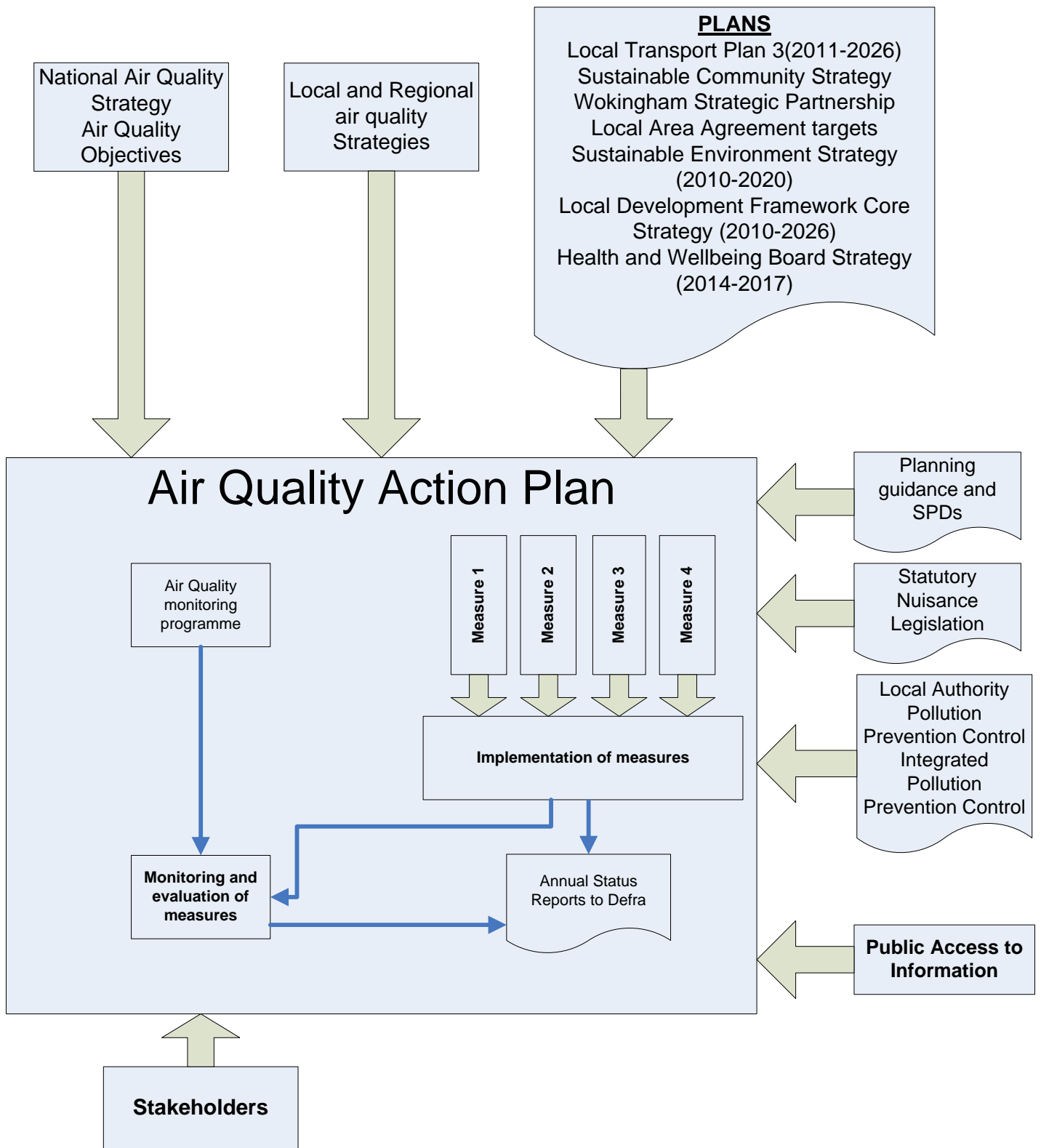
This report outlines the actions that Wokingham Borough Council will deliver between 2017-2026 in order to reduce concentrations of air pollutants and exposure to air pollution; thereby positively impacting on the health and quality of life of residents and visitors to the Wokingham Borough's administrative area.

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

This Plan will be reviewed every five years at the latest and progress on measures set out within this Plan will be reported on annually within Wokingham Borough Council's air quality ASR.

There is a level of synergy between the aims and objectives of the AQAP and existing plans and strategies to which Wokingham Borough Council contribute or manage. A list of these plans and their strategic links with the Action Plan are show diagrammatically in Figure 1.

Figure 1 AQAP and its links with other WBC Plans and Strategies



3 Summary of Current Air Quality in Wokingham Borough Council

Within this AQAP the two AQMAs for Twyford Crossroads and Wokingham Town Centre are being addressed. Refer to Appendix C for the map showing the extent of the Twyford AQMA and Appendix D for the map showing the extent of the Wokingham Town Centre AQMA.

The latest ASR (August 2016 for the year 2015) can be found on our website at <http://info.westberks.gov.uk/CHttpHandler.ashx?id=43163&p=0>

Local Priorities and Challenges for Wokingham Borough were identified as:

- Exploring the link between public health and PM_{2.5};
- Joint working between the Public Health and Environmental Health teams and links within the Berkshire Public Health Shared Team, considering the inclusion of air quality in the Public Health Work Plan and the Health and Wellbeing Strategy;
- Continuing to work within the unitary authority with the Transport Policy and Highways Teams;
- Progress the 'Further Assessments' for the Wokingham Town Centre and Twyford Town Centre AQMAs;
- Develop the AQAPs for the Wokingham Town Centre and Twyford Town Centre AQMAs;
- Consider revocation of the M4 AQMA following the opening of the new motorway bridge as part of the Shinfield Eastern Relief Road Scheme; and
- Continue the continuous and passive air quality monitoring programmes.

The following challenges have been identified:

- Budget allocation for progressing measures and actions; and
- Linking of the Public Health Outcome Framework and health profiles to air quality to show any causal relationship.

4 Wokingham Borough Council's Air Quality Priorities

4.1 Public Health Context

The link between air quality, particularly from PM_{2.5}, and public health in the Borough requires exploration and this has been set as one of the priorities. Further joint working between Public Health and Environmental Health Teams and links within the Berkshire Public Health Shared Team has also commenced. These are to follow on from the Joint Strategic Needs Assessment (JSNA)

(<http://jsna.wokingham.gov.uk/people-and-places/environmental-health-and-licensing/>) and the Health and Wellbeing Strategy 2014-2017

(<http://www.wokingham.gov.uk/council-and-meetings/open-data/plans-policies-and-strategies/?assetdet7653806=345516&categoryesctl8486112=7736&assetdet8733745=345516&categoryesctl9084667=7736>). The JSNA uses data and evidence from

the current health and wellbeing in the Borough to highlight the health needs of the whole community. It shows how needs might vary for different age groups and identifies health differences in disadvantaged or vulnerable groups. The JSNA also looks at a wider range of factors that help shape the health and wellbeing of individuals, families and local communities such as education, employment and the environment. Air Pollution is under the Environmental Health and Licensing section.

4.2 Planning and Policy Context

Environmental Health has continued to work in conjunction with the Transport Policy Team with the implementation of Local Transport Plan 3 (2011 – 2026). The Plan includes a Transport Vision setting out the long-term transport strategy for the borough, particularly for the four new communities being created to accommodate the majority of the construction of over 13,000 new houses in Wokingham Borough as identified in the Local Development Framework Core Strategy. The vision is to provide a cost-effective, inclusive transport network that enhances the economic, social and environmental prospects of the Borough whilst promoting the safety, health and wellbeing of those that use it. The key goals are:

Highways – to have a resilient safe highway network that balances capacity for all users, enhances the economic prospects of the borough, and promotes sustainable travel;

Active travel – to work with partners to promote walking and cycling as a health-enhancing physical activity for all of our residents;

Public transport - to promote an integrated and inclusive public transport network that provides a convenient , acceptable reliable and affordable alternative to car travel;

Smarter choices and demand management – to enable people who live, visit and work in the borough to make informed safe and sustainable travel decisions from a range of transport options; and

Strategic projects – to manage the demand for travel in order to ensure that people have a high level of access to different destinations, with sufficient choice, whilst minimising the adverse effects of congestion. The Plan acknowledges the link with the M4 AQMA and any future AQAP's. There is also a specific Policy on Air Quality (Policy LTP HW10) which states that the Council will continue to develop and implement our Draft Air Quality Action Plan in response to pollution caused by vehicle emissions. Furthermore, a key objective of the Strategic Environmental Assessment for LTP3 was to improve air quality. LTP Strategies continue to be reviewed and/or implemented.

Currently Environmental Health is developing a planning policy guidance document to be called “Planning for Air Quality (including Good Design, Emissions Mitigation Assessments and Air Quality Assessments)”. This is being carried out in close consultation with Public Health and Planning colleagues. The document will be for new developments and will encourage all developments to adopt good practice design principles to protect local air quality. Additionally, it sets out when an emissions mitigation assessment and/or an air quality assessment is required. An emissions mitigation assessment is required for all major developments, and an air quality assessment for all developments that meet ‘relevant criteria’ i.e. developments with the potential for/to cause public exposure to elevated levels of air pollution. The emissions mitigation assessment is to assess the likely additional traffic emissions generated by the development over a 5 year period to determine an appropriate monetary value of mitigation to be adopted (preferably on site) to help reduce potential effects on local air quality. If mitigation measures cannot be accommodated within the development then mitigation could be provided through compensation via planning conditions or other formal agreement towards mitigation

elsewhere. The purpose of an air quality assessment is to predict the likely impacts of the development on air quality, help guide appropriate mitigation measures, and to ensure Local Planning Authorities can make an 'informed decision' about the development with regard to impacts on air quality. It is considered that this type of policy could be an important way for the three Councils within the Public Protection Partnership (Bracknell Forest, Wokingham and West Berkshire) to encourage and facilitate actions to protect local air quality. Mitigation measures (based on likely costs of air quality impacts) would either be adopted on site or generate funds that could be used towards mitigation measures elsewhere, with the aim of helping to facilitate actions to improve air quality in Air Quality Management Areas.

4.3 Source Apportionment

The AQAP measures presented in this report are intended to be targeted towards the predominant sources of emissions within Wokingham Borough Council's area.

A source apportionment exercise was carried out for Wokingham Borough Council in February 2017 by Peter Brett Associates as part of the Updated Detailed Assessment. The source apportionment included the following categories: Ambient background, cars, light goods vehicles, heavy goods vehicles, bus and motorcycles. The most significant components in both Twyford and Wokingham were ambient background followed by emissions from passenger cars.

This identified that within the AQMAs, the percentage source contributions were as follows:

For Twyford Crossroads, at receptors 4, 5 and 6 (19, 23a and 25 High Street) the predicted concentrations have the highest influence from road sources, representing approximately 65% of total annual mean concentration. Passenger cars are the source that contributes most to this result with approximately 30% of the emissions. The remaining receptors have more than 50% contribution from background concentrations.

For Wokingham Town Centre, at receptors 4, 5, 13 to 21 (14 Shute End, 1-3 Shute End, 1 Wiltshire Road, Queen Victoria House, 65 Peach Street, Flats above 54, 45, 26 and 18 Peach Street) the predicted concentrations have the highest influence from road sources concentrations, being the total road emission concentration from all the vehicles more than 55%.

4.4 Required Reduction in Emissions

4.4.1 Twyford Crossroads

For the annual mean NO₂ objective to be achieved concentrations need to be below 40 µg/m³. The required NO₂ and NO_x reductions at those receptors where exceedances are predicted are in Table 4.

Table 4.1 Twyford reductions in NO₂ concentrations and NO_x emissions required

Receptor / address	NO ₂ annual mean concentration (µg/m ³)	NO ₂ reduction required (µg/m ³)	NO _x emissions reduction required (%)
R4 19 High Street	51.8	11.8	36.6
R5 23a High Street	52.1	12.1	37.2
R6 25 High Street	51.7	11.7	36.4

The highest predicted concentration is 52.1 µg/m³ at R5 where a reduction of 12.1 µg/m³ would be required in order to meet the annual mean objective of 40 µg/m³. A reduction of NO_x emissions of 37% would be required in order to bring about a reduction in NO₂ concentrations below the objective.

Predicted hypothetical reductions in flow show that reductions in emission from individual vehicle types in isolation are unlikely to bring about the required reductions. The only reductions which bring about the required air quality improvements at the 3 receptors is a reduction in total vehicle (all vehicles – cars, LDV, HGV, Bus, MCL) emissions of 50%. A 50% car reduction is the individual vehicle type with the highest reduction although it is insufficient to bring compliance with the objective.

A reduction HGVs and buses emissions would contribute significantly in the emissions reduction as they contribute over 23% of the pollutant levels.

4.4.2 Wokingham Town Centre

The required NO₂ and NO_x reductions at those receptors where exceedances are predicted are in Table 4.2 below.

Table 4.2 Wokingham Town Centre reductions in NO₂ concentrations and NO_x emissions required

Receptor / address	NO ₂ annual mean concentration (µg/m ³)	NO ₂ reduction required (µg/m ³)	NO _x emissions reduction required (%)
R13 1 Wiltshire Road	40.6	0.6	1.5
R14 Queen Victoria House	41.0	1.0	3.2
R16 65 Peach Street	55.5	15.5	44.3
R17 Flat above 54 Peach Street	42.1	2.1	8.1
R18 Flat above 45 Peach Street	44.7	4.7	17.8
R19 Flat above 26 Peach Street	52.8	11.8	39.2
R20 Flat above 17 Peach Street	52.7	12.7	39.0
R21 Flat above 18 Peach Street	52.9	12.9	39.5

The highest predicted concentration in Wokingham is 55.5 µg/m³ at R16 where a reduction of 15.5 µg/m³ would be required to meet the annual mean objective. A reduction of NO_x emissions of approximately 44% would be required in order to bring about a reduction in NO₂ concentrations to below the objective.

Predicted hypothetical reductions in flow show that the reductions in emissions from individual vehicle types in isolation are unlikely to bring about the required reductions. The only reductions which will bring about the required air quality improvements at the receptors are a reduction in total emissions of 50%. A 50% cars reduction scenario is the individual vehicle type with the highest reduction although it not enough to bring about compliance with the objective.

A reduction in HGVs and buses combined would also assist in the emissions reduction as they contribute to 11% of the pollutant levels.

4.5 Key Priorities

Based in the details above the areas prioritised for action for Twyford Crossroads are:

- Priority 1 – reduction in passenger cars
- Priority 2 – reduction in total vehicles
- Priority 3 – encourage sustainable travel

Based on the details above the areas prioritised for action for Wokingham Town Centre are:

- Priority 1 – reduction in passenger cars
- Priority 2 – reduction in HGVs
- Priority 3 – reduction in buses or increase in hybrid or electric buses
- Priority 4 – encourage sustainable travel

5 Development and Implementation of Twyford Crossroads and Wokingham Town Centre AQAP

5.1 Consultation and Stakeholder Engagement

In developing this AQAP, we have worked with other local authorities, agencies, businesses and the local community to improve local air quality. Schedule 11 of the Environment Act 1995 requires local authorities to consult the bodies listed in

Table 5.1 below. In addition, we have undertaken the following stakeholder engagement:

- All Air Quality reports are available on the Council's website
- Stakeholder Workshop held on 31/01/17 at Council Offices, advertised on social media and letter drop to all residential and commercial premises with AQMAs, and invitations sent to public transport operators, Chamber of commerce, freight association and other local interest groups. Attendance from town and parish councils, Berkshire Public Health, cycle campaign group and local media as well as many internal service areas including highways, transport, planning and public health
- WBC Internal officer working group
- Engagement with Director of Public Health and local and shared public health teams
- Consultation carried out in line with Council's corporate consultation process on website as well as promotion via a media release, social media and other targeted bodies.

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

Table 5.1 – Consultation Undertaken

Yes/No	Consultee
Yes	the Secretary of State (Air and Environment Quality Division)
Yes	the Environment Agency (External Relations dept)
Yes	the highways authority (Wokingham Borough Council)
Yes	all neighbouring local authorities (Reading BC, Bracknell Forest Council, RB Windsor & Maidenhead, West Berkshire Council, , Basingstoke & Deane BC, Hart DC, Hampshire CC, South Oxfordshire DC, Oxfordshire CC, Wycombe DC, and Buckinghamshire CC)
Yes	other public authorities as appropriate, such as Public Health officials
Yes	bodies representing local business interests and other organisations as appropriate (including town and parish councils, public transport operators, Chamber of commerce, freight association, cycle groups)

5.2 Steering Group

The internal officer working group is attended by the following teams:

- environmental health;
- public health;
- transport planning including travel planning and active travel
- highways assets;
- highways development control:
- development management;
- planning policy (growth and delivery) and transport;
- Wokingham town centre regeneration;
- PR/communications- separately involved for press releases, other publications and consultation process

The Chair is Environmental Quality Team Manager who feeds back to the Head of Development Management and Regulatory Services (Development Management, Planning Enforcement and Compliance, Trees and Landscape, Building Control, Shared Service (Environmental Health, Licensing and Trading Standards) and keeping lead members for Environmental Health, Highways and Transport and Public Health informed.

Engagement with the Director of Public Health and Berkshire Public Health team has taken place and on a wider basis discussion with representatives from the Environmental Hazards & Emergencies Department at the Centre for Radiation, Chemical & Environmental Hazards at Public Health England.

Prior to this consultation there has not been involvement with Environment Agency and Highways England as the source of the exceedances of the annual mean nitrogen dioxide objective is from the local authority controlled roads only, however they have been included in the consultation process.

.

6 AQAP Measures

Table 6.1 below details the Wokingham Borough Council Twyford Crossroads AQAP measures.

Table 6.2 below details the Wokingham Borough Council Wokingham Town Centre AQAP measures.

Table 6.3 below details the Wokingham Borough Council generic measures.

They contain:

- a list of the actions that form part of the plan, which have NOT been prioritised and are grouped within the EU categories and EU classifications
- the responsible individual and departments/organisations who will deliver this action
- estimated cost of implementing each action (overall cost and cost to the local authority)
- expected benefit in terms of pollutant emission and/or concentration reduction
- the timescale for implementation
- how progress will be monitored

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

Table 6.1 – Air Quality Action Plan Measures for Twyford Crossroads

Measure No.	Measure	EU Category	EU Classification	Lead Authority	Planning Phase	Implementation Phase	Key Performance Indicator	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
1	Investigate the feasibility of alternative traffic routes around Twyford	Transport planning and infrastructure	Other	WBC	2017-2019	Post 2026	Feasibility study carried out	12.1 µg/m ³	Local Plan update is ongoing. This will make recommendations regarding development and supporting infrastructure needs.	Local Plan Update process will conclude in 2020/21	Aim for some through traffic avoided from going through AQMA
2	Twyford railway station 1.Consider access for vehicles, buses, taxis, cyclists and pedestrians 2. Consider integration of public transport links 3. Consider car parking and cycling provisions	Transport planning and infrastructure	Public transport improvements-interchanges stations and services	WBC GWR Twyford PC	2017-2019 onwards	2019 onwards	Changes incorporated	12.1 µg/m ³	Preliminary studies have been undertaken by GWR &WBC to understand costs and option available for development	Long term project	To work with all partners to further promote and encourage sustainable transport to and from stations, this includes soft measures as well as infrastructure delivery. Additionally to work with the Local Plans Team to provide wider solutions that will allow alternative routes around Twyford Crossroads. Western Rail Access to Heathrow coming also.

Measure No.	Measure	EU Category	EU Classification	Lead Authority	Planning Phase	Implementation Phase	Key Performance Indicator	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
3	Review cycle paths	Transport planning and infrastructure	Cycle network	WBC	2016/17/18	2018 onwards	Increase in usage	12.1 µg/m ³	On-going project	On-going project	Cycleway delivery is part of the yearly capital programme
4	Investigate options of A4 and A3032 junction at Hare Hatch	Traffic management	Strategic highway improvements	WBC	2018/19	2018/19	Investigation carried out	12.1 µg/m ³	No progress to date. Budget needs to be agreed and allocated.	2018/19	Traffic more likely to travel east of village so avoiding AQMA
5	Continue to monitor traffic lights and crossings to maximum efficiency and consider their functionality including left turns and peak hour use	Traffic management	Strategic highway improvements	WBC	tbc	tbc	Review of phases with traffic flow data and real time air quality data	12.1 µg/m ³	No progress to date. Budget needs to be agreed and allocated.	tbc	Determine effect on air quality with different phases. Linked with traffic monitoring to be set up and new continuous monitoring site.
6	Carry out a feasibility study for a Low Emission Zone for the crossroads	Promoting low emission transport	Low Emission Zone (LEZ) or Clean Air Zone (CAZ)	WBC	tbc	tbc	Feasibility study carried out	12.1 µg/m ³	No progress to date	tbc	Business case for a LEZ needs developing. Consider implications of the transfer of Criminal Parking Enforcement powers to Local Highway Authority.
7	Review bus fleet and consider alternative fuels.	Vehicle fleet efficiency	Promoting Low Emission Public Transport	Bus companies as contracted by WBC	2016/17	2017/18	Increase in number of buses run on alternative fuels	12.1 µg/m ³	2017 -RTL run hybrid buses, CNG all low emission	Ongoing with other operators	Reducing emissions within AQMA

Measure No.	Measure	EU Category	EU Classification	Lead Authority	Planning Phase	Implementation Phase	Key Performance Indicator	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
8	Install "Cut Pollution, Turn off your engine" signs when queuing at traffic lights.	Public information	Other	WBC	tbc	tbc	Drivers do follow the advice	12.1 µg/m ³	No progress to date, programme of signing needs to be included in the highways capital programme.	tbc	This is a quick win that could be delivered quickly depending on the nature of the signs.
9	Consider feasibility of Park and Ride strategy for Twyford	Alternatives to private vehicle use	Bus based park & ride	WBC	2017-2019	Linked to development	Feasibility study carried out	12.1 µg/m ³	No progress to date, Budget needs to be agreed and allocated	tbc	A study needs to be undertaken, including the business case
10	School Travel Plans (Mode Shift Stars)	Promoting travel alternatives	School travel plans	WBC	2016	2017 and ongoing	Continue to be developed and reviewed	12.1 µg/m ³	On going	Open ended	Reduction in cars travelling through AQMA

Table 6.2 – Air Quality Action Plan Measures for Wokingham Town Centre

Measure No.	Measure	EU Category	EU Classification	Lead Authority	Planning Phase	Implementation Phase	Key Performance Indicator	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
1	Intelligent traffic signals at Shute End	Traffic management	Strategic highway improvements	WBC	tbc	tbc	Installation of MOVA	15.5 µg/m ³	No progress to date, Budget needs to be agreed and allocated	tbc	Intelligent signs are more costly than regularly signing and budget will have to be allocated
2	Consider speed reduction through town centre	Traffic management	Reduction in speed limits, 20 mph zones	WBC Highways TVP	tbc	tbc	tbc	15.5 µg/m ³	No progress to date	tbc	Requires a TRO supported by TVP. Consider design speed as well as speed limit.

Measure No.	Measure	EU Category	EU Classification	Lead Authority	Planning Phase	Implementation Phase	Key Performance Indicator	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
3	Review traffic routes in the town centre, and consider if any roads require restricted access	Traffic management	Strategic highway improvements, reprioritising road space away from cars, inc Access management, selective vehicle priority, bus priority, high vehicle occupancy lane	WBC	ongoing	ongoing	Review carried out	15.5 µg/m ³	No progress to date Business case needs to be developed	tbc	This action requires a major remodelling of the highway. Scenarios will have to be modelled to make sure that the problem is not simply transferred to another part of the network.
4	North Wokingham distributor road	Traffic management	Strategic highway improvements, reprioritising road space away from cars, inc Access management, selective vehicle priority, bus priority, high vehicle occupancy lane	WBC	completed	2017 onwards	Completion	15.5 µg/m ³	Under construction	2020/21	Includes bus stops and cycle ways
5	South Wokingham distributor road	Traffic management	Strategic highway improvements, reprioritising road space away from cars, inc Access management, selective vehicle priority, bus priority, high vehicle occupancy lane	WBC	commenced	ongoing	Completion	15.5 µg/m ³	Commenced At Montague Park	2020/21	Includes bus stops and cycle ways

Measure No.	Measure	EU Category	EU Classification	Lead Authority	Planning Phase	Implementation Phase	Key Performance Indicator	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
6	Reconfiguration of Shute End/Broad Street/ Rectory Road junction	Traffic management	Strategic highway improvements, reprioritising road space away from cars, inc Access management, selective vehicle priority, bus priority, high vehicle occupancy lane	WBC	tbc	tbc	Reduction in NO2	15.5 µg/m ³	No progress to date Business case needs to be developed	tbc	Land availability at Shute End is limited to provide any new solution
7	Consider outcome of Feasibility study of improvements to Rectory Road/ Wiltshire Road	Traffic management	Strategic highway improvements, reprioritising road space away from cars, inc Access management, selective vehicle priority, bus priority, high vehicle occupancy lane	WBC	tbc	tbc	Feasibility study carried out	15.5 µg/m ³	No progress to date Business case needs to be developed	tbc	Historically there have been a number of studies into this issue and land availability has always been a limiting factor
8	Active management of car parking	Traffic management	other	WBC	completed	October 2017	Implementation	15.5 µg/m ³	Introduction of civil parking enforcement	2018	This will actively manage car parking in the town centre and across the borough
9	Alternative arrangement for access to car parks	Traffic management	other	WBC	2017/18	tbc	Implementation	15.5 µg/m ³	This is part of the town centre regeneration process.	tbc	Parking Strategy e.g. Easthampstead Road car park
10	Workplace and school travel planning	Promoting travel alternatives	Workplace travel planning and school travel plans	WBC	commenced	ongoing	Continue to implement. Number of plans	15.5 µg/m ³	Long standing programme of schools travel plans	My Journey Wokingham is an on-going project	Model shift Stars programme https://modeshiftstars.org

Measure No.	Measure	EU Category	EU Classification	Lead Authority	Planning Phase	Implementation Phase	Key Performance Indicator	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
11	Residential travel planning	Promoting travel alternatives	Personalised travel planning	WBC	commenced	ongoing	Continue to implement. Number of plans	15.5 µg/m ³	Programme started 2017/18	My Journey Wokingham is an on-going project	Personalised travel planning Promoting the benefits of sustainable travel http://www.myjourneywokingham.com
12	Carry out feasibility study for a Low Emission Zone	Promoting low emission transport	Low emission zone or Clean Air Zone	WBC	tbc	tbc	Feasibility study carried out	15.5 µg/m ³	No progress to date Business case needs to be developed	tbc	This action also requires transport modelling to understand likely impacts
13	Coppid Beech Park and Ride for Wokingham Town Centre	Alternatives to private vehicle use	Bus based park and ride	WBC	2016/17/18	2019/20	Installation and number of journeys	15.5 µg/m ³	Outline plans being developed	Dec 2019	Using RTL's existing hybrid buses (Lion 4)

Table 6.3 – Air Quality Action Plan Measures for Wokingham Borough - generic / Borough wide

Measure No.	Measure	EU Category	EU Classification	Lead Authority	Planning Phase	Implementation Phase	Key Performance Indicator	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
1	Review locations and publication of EV charging points, and increase provision	Promoting low emission transport	Procuring alternative refuelling infrastructure to promote low emission vehicles, EV recharging, gas fuel recharging	WBC	tbc	tbc	Number of charging points	15.5 µg/m ³	No progress to date Business case needs to be developed	tbc	Preparing for the future with increase in uptake of EV use. Decrease in car emissions. Mitigation at planning stage within new local plan.

Measure No.	Measure	EU Category	EU Classification	Lead Authority	Planning Phase	Implementation Phase	Key Performance Indicator	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
2	Consider implementation of parking charges related to vehicle type e.g. Free for electric vehicles	Promoting low emission transport	Priority parking for LEV's	WBC	tbc	tbc	Policy agreed and implemented	15.5 µg/m ³	No progress to date	tbc	Encouraging residents and commuters to consider EV vehicle
3	Low emission vehicles – consider implementation in Council contracts, fleet cars etc EV pool cars for WBC staff	Promoting low emission transport	Company vehicle procurement – prioritising uptake of low emission vehicles	WBC	16/17	16/17	Vehicle usage	15.5 µg/m ³	WBC EH and TP/WSP have zero emission hybrid company vehicles	tbc	Requirements to have low and zero emission vehicles and plant need to be included in any new WBC lets contracts
4	Consider removal of on street parking, to provide more space for cycle lanes, EVs, car clubs, provision of on street charging points	Traffic management	Strategic highway improvements, reprioritising road space away from cars, inc Access management, selective vehicle priority, bus priority, high vehicle occupancy lane	WBC	tbc	tbc	tbc	15.5 µg/m ³	No progress to date	tbc	This action would be considered politically and economically sensitive
5	No idling signs - for buses and taxis in waiting areas and at level crossings.	Traffic management	Anti-idling enforcement	WBC	tbc	tbc	tbc	15.5 µg/m ³	No progress to date	tbc	This action would need enforcement and co-operation of TVP

Measure No.	Measure	EU Category	EU Classification	Lead Authority	Planning Phase	Implementation Phase	Key Performance Indicator	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
6	Roadside emission testing , detecting and fining polluting vehicles	Traffic management	Testing vehicle emissions	WBC TVP	tbc	tbc	Number of vehicles failed	15.5 µg/m ³	No progress	tbc	Link with work by Trading Standards re overloaded vehicles Will require implementation of legislation
7	Improvements of cycle routes to ensure continuous and integrated	Transport planning and infrastructure	Cycle network	WBC	17/18	2018/19	Length of cycle ways provided	15.5 µg/m ³	On going	On going	Capital funding for improvements and updating cycle network borough wide
8	Residential Travel Planning	Promoting travel alternatives	Personalised travel planning	WBC	2016/17	commenced	Number of plans	15.5 µg/m ³	Programme started 2017/18	Open ended	Personalised travel planning Promoting the benefits of sustainable transport through My Journey project. Linked to future development.
9	Encourage WBC staff to travel more sustainably	Promoting travel alternatives	Workplace travel planning	WBC	2017	ongoing	Increase in commuting by alternative means	15.5 µg/m ³	WBC offices have adopted a travel plan	On going	WBC offices have adopted a travel plan that is supported by My Journey Wokingham project
10	Secure and sheltered bike parking provisions	Promoting travel alternatives	Promotion of cycling	WBC	ongoing	ongoing	Provided	15.5 µg/m ³	On going	On going	Business and residential travel plans often have bike shelters provided as part of planning permission
11	Partnership with Sustrans	Promoting travel alternatives	Promotion of cycling	WBC	2016	ongoing	No of events	15.5 µg/m ³	Officer started in 2016 as part of My Journey Wokingham project	2020/21	Active Travel Officer promotes all forms of sustainable transport doing public demonstrations and events

Measure No.	Measure	EU Category	EU Classification	Lead Authority	Planning Phase	Implementation Phase	Key Performance Indicator	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
12	Promoting active travel via My Journey website	Promoting travel alternatives	Intensive active travel campaign and infrastructure	WBC	2017	ongoing	Projects implemented	15.5 µg/m ³	Variety of projects implemented	tbc	Travel information and advice http://www.myjourneywokingham.com/
13	Thames Valley Park Park and Ride	Alternatives to private vehicle use	Bus based park and ride	WBC/RBC	2016/17	2017 - 2019	Opening of scheme	15.5 µg/m ³	Planning permission granted 2017	2019	Delivered in partnership with RBC and funded through the Local Growth Fund
14	Provision of Car Clubs with or without EVs	Alternatives to private vehicle use	Car clubs	WBC	2015 feasibility study	2017 onwards	Usage of vehicles	15.5 µg/m ³	One car club operational at Montague Park	On going	Developers required to deliver car clubs as part of their commitments to residential travel plans
15	Awareness campaign for the risks of poor air quality and promoting active and sustainable travel	Public information	other	WBC PH	2017/18	tbc	Increased awareness	15.5 µg/m ³	No progress	tbc	Use apps or technology to show people how to avoid exposure to pollution
16	Air quality included in to JSNA and Health and Wellbeing Strategy	Policy guidance and Development control	Other policy	WBC PH Berkshire	2016/17	2017/18	Inclusion in JSNA reviews and Health and Wellbeing Strategy	15.5 µg/m ³	Meetings with Director of Public Health and Berkshire Shared Team held	2017/18	Link with Director of PH for Berkshire
17	New Local Plan and LTP4 – Sustainable Transport, include EV charging points for new developments	Policy guidance and Development control	Other	WBC	TBC	Plan period will cover 2019-2036	Implementation	15.5 µg/m ³	No progress to date	tbc	PH team must make the correct representation to support the Planning Policy team through the EIP process, proving it is not an unnecessary burden on developers.

Measure No.	Measure	EU Category	EU Classification	Lead Authority	Planning Phase	Implementation Phase	Key Performance Indicator	Target Pollution Reduction in the AQMA	Progress to Date	Estimated Completion Date	Comments
18	Linking with Highway Asset Management Plans	Policy Guidance and Development Control	Other	WBC	tbc	tbc	tbc	15.5 µg/m ³	No progress	tbc	Ensuring value for money when maintaining and upgrading highway infrastructure.
19	Neighbourhood Development Plans to consider air quality	Policy Guidance and Development Control	Other	WBC with town and parish councils	TBC	TBC	Inclusion in Plans	15.5 µg/m ³	No progress	tbc	Inform Parish and Town Councils
20	Freight Management Plan	Freight and delivery management	Delivery and service plans	WBC	2019/20	2019/20	Review and implementation	15.5 µg/m ³	No progress to date Business case needs to be developed		Consider freight access to town centre, including destination and delivery times Link with Freight Route Network
21	Consideration of air quality in the development of the Taxi Licensing Policy	Policy guidance and Development control	Other policy	WBC	2018	Consultation 2018	Adoption and application of the policy	15.5 µg/m ³	Proposal to licensing committee	July 2018	Providing policy is agreed by Licensing Committee this should take effect immediately. Further restrictions could be considered.

7 Appendix A: Response to Consultation

Summary of Responses to Consultation and Stakeholder Engagement on the AQAP

Consultee	Category	Response
Workshop 31/01/17 feedback	All stakeholders attending	<p>Results from prioritisation exercise of measures suggested at workshop were:</p> <ul style="list-style-type: none"> Highest number “for” the reduction the number of cars used for school journeys followed by the early adoption of the new relief roads in Wokingham to enable traffic to flow, education and behavioural changes, and introduction of time zones for deliveries. Highest number “against” was to reduce speed limits, followed by SMART traffic lights and preventing rat running by stopping up secondary roads.
Public consultation summer 2017	23 individuals and 1 organisation representing cycling	<p>General consensus that this is a step in the right direction but could more be done.</p> <p>For both locations the actions to investigate the feasibility of traffic routes around the AQMAs were most popular along with changes to the traffic lights. Across the whole borough the increased provision of electric vehicle charging points is encouraged as well as in new developments. Other measures recommended to include are: improvements to the cycle network, more consideration of the impact of car journeys to school, and the introduction of signage at Twyford Crossroads traffic lights to switch of engines whilst waiting.</p>
Members meeting	Elected members	<ul style="list-style-type: none"> Ward member for Twyford suggested the following: We currently have

autumn 2017		<p>4 way Traffic Lights with vehicles able to go both ways along all 4 roads at the crossroads. If we were to alter one road to allow traffic to leave the crossroads but not approach the crossroads i. e. One way. This would reduce the traffic to only 3 stops and thereby reduce the waiting time and thereby reduce emissions. As the High Street going towards Charvil appears to be the worst road and the pavements are particularly narrow this would appear to be the obvious road to make one way up to the Old Mill Court Road. I would note that traffic from Charvil would then have to travel along the A4 and down Wargrave Road to get into the village centre. I would also note that for in excess of 6 months this road was closed to all traffic when the bridge was repaired and did not appear to cause too many problems. Finally if this were to be adopted we could widen the pavements along the High Street and allow pedestrians from Bridge House to use wheelchairs to get into the village.</p> <ul style="list-style-type: none"> • Discussion resulted in a number of minor changes to the wording of some actions and the inclusion of the words “and crossings” to Twyford action number 5 • Suggestion to add Market Place, Peach Street and Broad Street to Wokingham Town Centre action number 1 • Suggestion to add changes to Taxi licensing regarding emission standards • Suggestion to consider the permanent closure of Luckley Path in Wokingham Town Centre action number 3
Internal Officer working group autumn 2017	Internal stakeholders	<ul style="list-style-type: none"> • Feedback for Planning Policy (Growth and Delivery) Team which resulted in minor changes to wording. • Feedback from Transport Policy Team in advance of meeting which resulted in the confirmation of many updates to progress on existing actions as well as actions in planning or implementation phases.

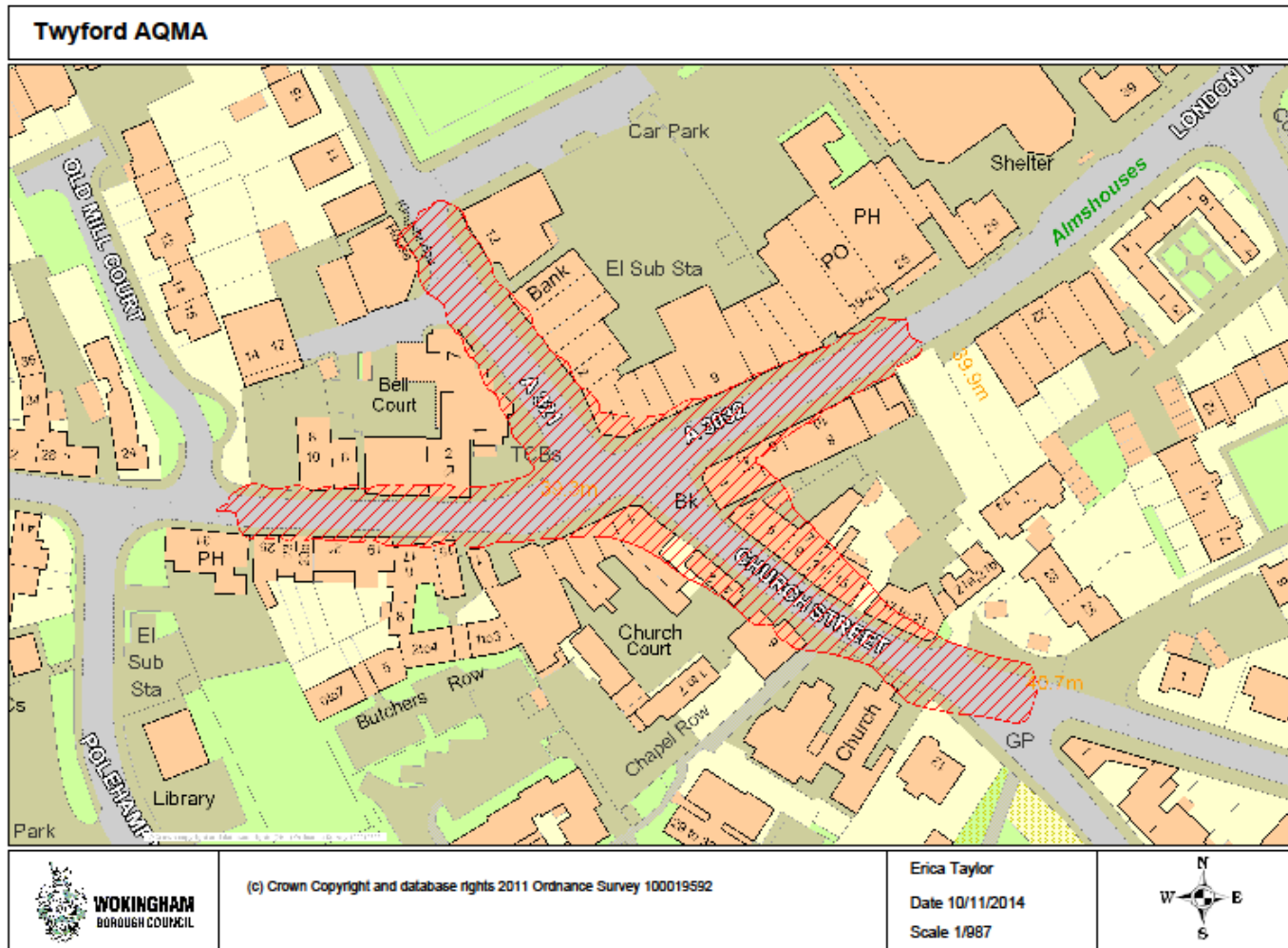
Members February 2018	Elected members	<ul style="list-style-type: none"> • Erecting signs on all lampposts approaching the traffic lights in Twyford saying “ Pollution hotspot – switch off engine while waiting for lights” • Writing to and asking bus and taxi companies what their plans are for introducing cleaner vehicles for use in our Towns. Remind them that they are major contributors to vehicle pollution. Also ask them to ensure their drivers switch off engines when in queues and waiting. • What can we do now regarding the phasing of traffic lights to ensure less people are left waiting at red lights when other turnings have no traffic? • Write to businesses in Wokingham Town centre asking them to take deliveries only outside rush hour times so the trucks do not block up the main roads.
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8 Appendix B: Reasons for Not Pursuing Action Plan Measures

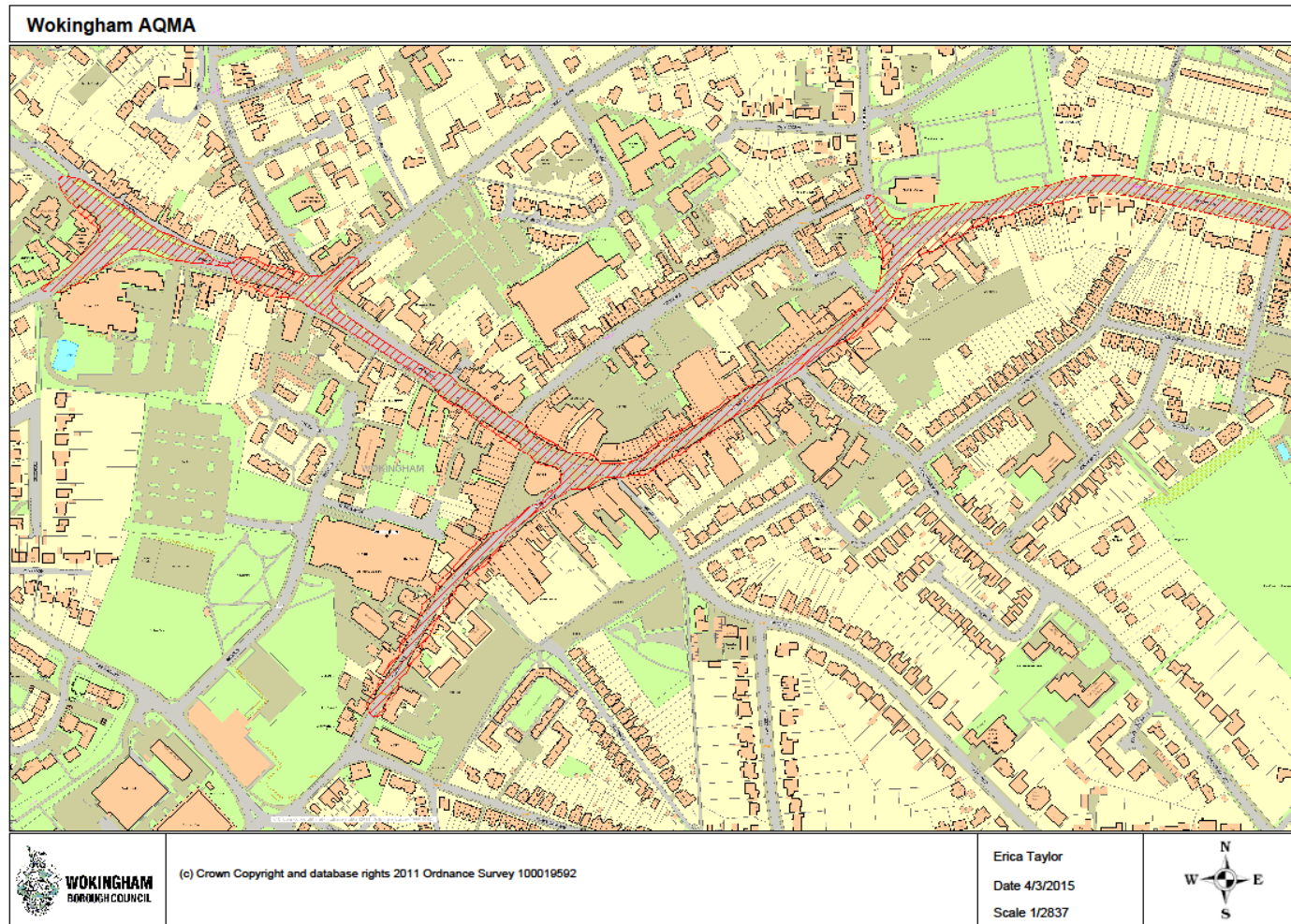
Action Plan Measures Not Pursued and the Reasons for that Decision

Action category	Action description	Reason action is not being pursued (including Stakeholder views)
Twyford action number 13	Consideration of the designation of A3032 (to B class)	Internal Officer stakeholder feedback advised that this would not be effective as sat nav’s would not be updated.

9 Appendix C: Twyford Crossroads AQMA



10 Appendix D: Wokingham Town Centre AQMA



11 Glossary of Terms

Abbreviation	Description
AQAP	Air Quality Action Plan - A detailed description of measures, outcomes, achievement dates and implementation methods, showing how the local authority intends to achieve air quality limit values'
AQMA	Air Quality Management Area – An area where air pollutant concentrations exceed / are likely to exceed the relevant air quality objectives. AQMAs are declared for specific pollutants and objectives
AQS	Air Quality Strategy
ASR	Air quality Annual Status Report
Defra	Department for Environment, Food and Rural Affairs
EU	European Union
LAQM	Local Air Quality Management
NO ₂	Nitrogen Dioxide
NO _x	Nitrogen Oxides
PM ₁₀	Airborne particulate matter with an aerodynamic diameter of 10µm (micrometres or microns) or less
PM _{2.5}	Airborne particulate matter with an aerodynamic diameter of 2.5µm or less
µg/m ³	Microgrammes per metre cubed

12 References

ASR 2016

Detailed Assessment, Peter Brett Associates, May 2014

Updated Detailed Assessment, Peter Brett Associates, February 2017

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Air Quality Wokingham Local Authority Draft

Introduction

Poor air quality is a significant public health issue. It has been estimated that removing all fine particulate air pollution would have a bigger impact on life expectancy in England and Wales than eliminating passive smoking or road traffic accidents¹. The economic cost from the impacts of air pollution in the UK is estimated at £9-19 billion every year². This is comparable to the economic cost of obesity (over £10 billion)³. A study in the Lancet found that particulate matter air pollution was the 5th highest mortality risk factor in 2015, causing 4.2 million deaths (7.6% of global deaths)⁴. In the UK, particulate air pollution is thought to be the cause of nearly 29,000 deaths in 2008 with an associated loss of 340,000 life years⁵.

Pollutants with the greatest current impact on public health are considered to be particulate matter 2.5 (PM 2.5), ozone and nitrogen dioxide; with PM 2.5 having the strongest epidemiological link to health outcomes. Damage occurs across a lifetime, from a baby's first weeks in the womb all the way through to the years of older age⁶.

These pollutants are produced by construction sites and machinery, farming, shipping, home and commercial heating, aircraft emissions, industrial processes and road transport. The standards for air quality are currently set in English law at the European Union (EU) standard through the Air Quality Standards Regulations (England) 2010 with equivalent legislation in the devolved areas of Wales, Scotland and Northern Ireland. It should be noted that this may become subject to change with the confirmation that the United Kingdom has now triggered the process for leaving the EU.

(Source- [Air Quality Standards Regulations 2010](#))

Ozone is a molecule constructed of oxygen atoms. It forms a natural barrier, known as the 'Ozone Layer' in the upper atmosphere protecting the Earth from the Sun's damaging ultraviolet radiation. However, at lower atmospheric levels ozone exposure represents a substantial risk to the health of the UK population and vegetation. Ozone is a secondary pollutant with most of its production coming from chemical reactions between other anthropogenic emissions rather than being directly emitted. This means ozone concentrations are highly variable due to prevailing atmospheric conditions, availability of its precursors and the amount of sunlight. As a result, ozone presents a difficult control problem because as not much is directly emitted it can be difficult to regulate the processes that lead to its creation. Ozone can travel long distances in the atmosphere with the result that emissions from mainland Europe can influence ozone concentrations in the UK, contributing to the control and regulation issue. This enforces the importance of measuring ambient air quality and not just emissions. Whilst rural ozone levels have remained relatively stable from 1991-2015, urban background ozone has been increasing since 1987 with a previous downward trend from 2006- 2011 reversed in 2011. There is a high degree of variability year on year making it difficult to ascertain a long term trend.

(Source – [DEFRA Air Quality 1987-2016](#), [Ozone in the United Kingdom, Air Quality Expert Group, DEFRA 2009](#), [Report on Mortality and Hospital Admissions caused by Ozone, COMEAP 2015](#), and [Hemispheric Transport of Air Pollution, ECFE 2010](#))

Nitrogen-based compounds (NOx) are also pollutants, particularly nitric oxide (NO) and nitrogen dioxide (NO₂). NOx is produced when hydrocarbons such as petrol, diesel or natural gas are burned and, unlike ozone, is a direct emission. NOx pollutants are one of contributory precursors for ground level ozone formation. There is evidence that high levels

of nitrogen dioxide is a respiratory irritant and, over a long period of time, affect how well our lungs work, particularly those with asthma. Studies have suggested it may contribute to impaired lung development and recurrent respiratory illnesses in children. NO₂ can also adversely affect vegetation.

An important factor to consider is the interaction between pollutants and the unintended effects of reducing one pollutant on another. Ozone reacts with NO to form NO₂ and oxygen. The amount of NO₂ is, therefore, dependant on the amount of ozone brought in by the weather conditions. An unintended consequence of reducing NO_x emissions is an increase in ozone concentration as there is less NO to react with the ozone and remove it from the air.

(Source – [Nitrogen Dioxide in the UK, Air Quality Group, DEFRA 2004](#), [Health effects of Nitrogen Dioxide, COMEAP 2014](#) and [Air Quality: A Briefing for Directors of Public Health, PHE 2017](#))

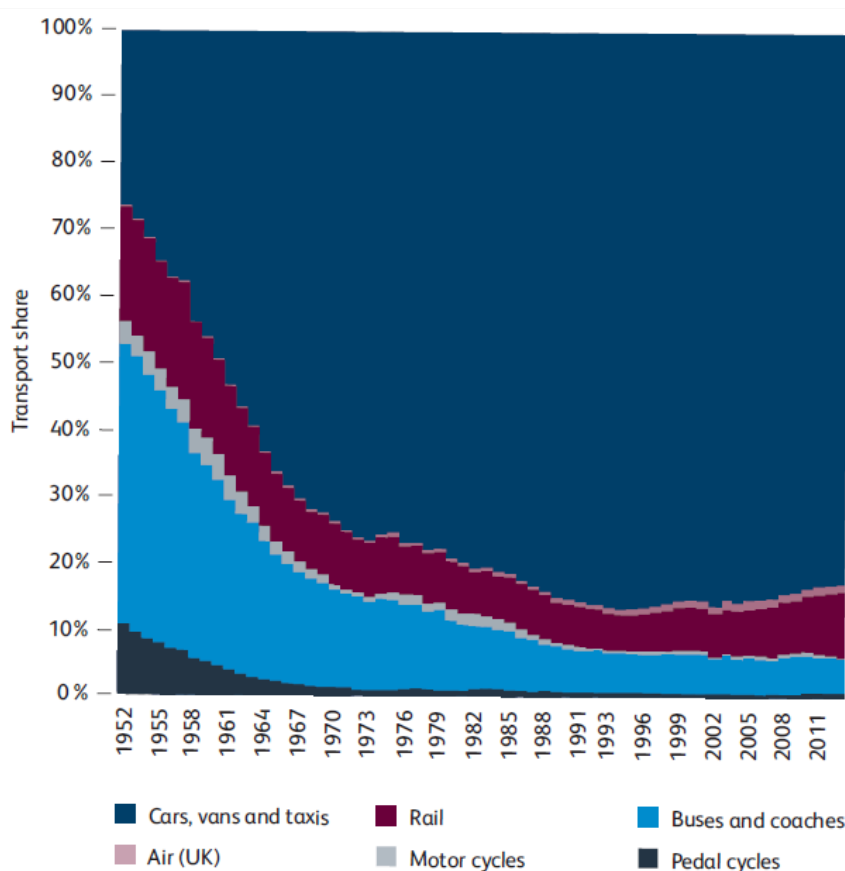
Exposure to ambient particulate matter pollution, particularly to small particles known as PM 2.5, is associated with increased risks of death and ill health. PM_{2.5} are tiny particles, less than <2.5 µm (<2.5 millionths of a metre) across and largely invisible. The size of particles is important because fractions of PM <10 µm in diameter tend not to be filtered out by the nose and fractions <2.5 µm are able to penetrate deep into the lungs. Very small particles from 0.1 to 0.001 µm are so small that they can pass into the circulation². The majority of data available is related to PM, as it has the strongest epidemiological link to health outcomes.

PM 2.5 is linked to respiratory diseases and is a possible cause of exacerbations of chronic lung diseases such as asthma or chronic obstructive pulmonary disease, but is also linked to cardiovascular diseases leading to myocardial infarctions and strokes⁴.

Reducing air pollution requires action to reduce domestic emissions as well as working closely with international partners to reduce transboundary emissions (pollutants blown over from other countries) which, at times, can account for a significant proportion of pollutant concentrations experienced in the UK (for example, it is estimated that sources outside of the UK account for 35-50% of measured ambient particulate matter concentrations).

(Source – [Air Pollution in the UK 2015, DEFRA](#), [Air Quality: A Briefing for Directors of Public Health, PHE 2017](#) and [Mortality effects of Long-Term Exposure to Particulate Air Pollution in the UK, COMEAP 2010](#))

Figure 1 – Comparison of use of different modes of transport over the last 60 years



<https://www.rcplondon.ac.uk/projects/outputs/every-breath-we-take-lifelong-impact-air-pollution>)

In contrast to the growth in motorised traffic (Figure 1), active transport such as walking and cycling has declined progressively since the 1950s. Primary emissions from road traffic, including the non-exhaust component, make a significant (about 30-50%) contribution to the urban background increment of PM 2.5 above rural concentrations (especially diesel engines)⁶. These produced particles affect everyone in the vicinity, including those driving.

Continued focus on controlling urban air pollution through technical measures to reduce vehicle exhaust components provides less benefit for public health than focusing on measures that increase active travel and public transport. Many studies have underlined the public health benefits of increased active travel by both cycling and walking, with the benefits outweighing the increased risks from accidents and air pollution exposure by a factor of at least ten³.

The importance of the effect of air pollution on public health is reflected by the inclusion of an indicator of mortality associated with air pollution in the Public Health Outcomes Framework for England (PHOF)⁷.

Facts, Figures, Trends

Please note, there are two different methods of PM 2.5 calculations used to produce this report as the sources of data are different. The methods are:

1. PM 2.5 data from PHOF is determined by modelling and use estimates of the anthropogenic (human-made) component of these concentrations on those 30+
2. Ambient particulate matter pollution data from GBD (Global burden of disease) uses models of total PM 2.5 estimates

PHOF indicator 3.01 is the fraction of preventable mortality that is estimated to be attributable to human-made particulate air pollution; estimates of this fraction for Berkshire LA's are shown in **Error! Reference source not found.**

Table 1 - Estimations of mortality by PM 2.5 concentrations (2014)

Area	England	Wokingham
Mean anthropogenic PM2.5	9.1	8.9
PHOF 3.1 Attributable fraction of deaths (%)	5.1	5.1
Attributable deaths	24,170	58
Associated life years lost	290,036	695

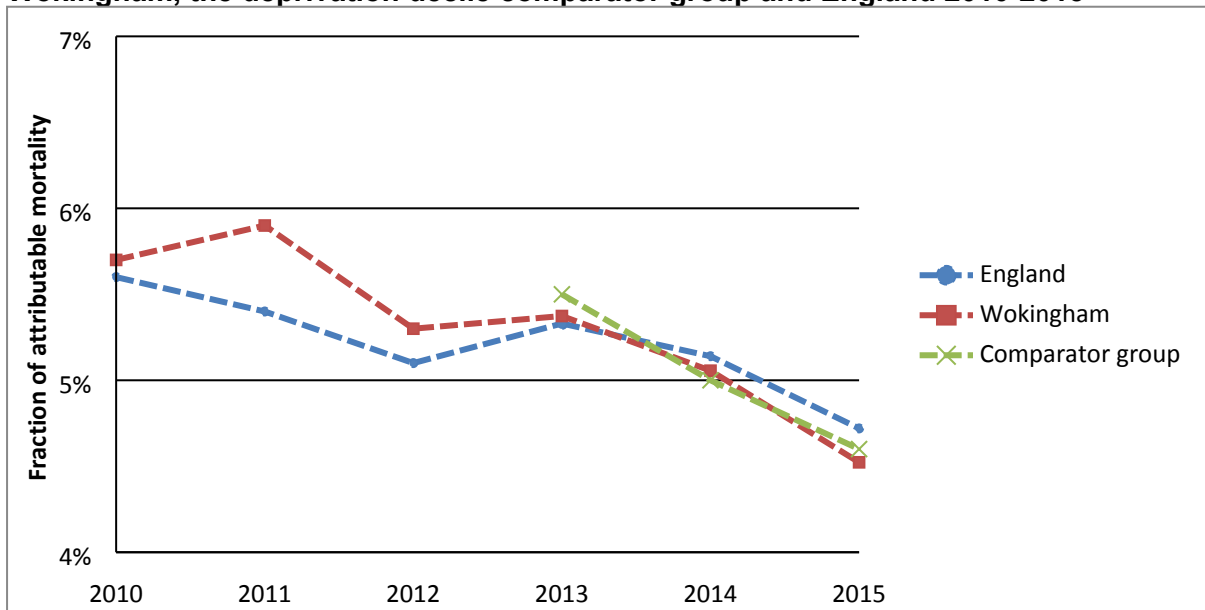
(Source - <https://uk-air.defra.gov.uk/data/pcm-data> , <http://www.phoutcomes.info/search/air#page/3/gid/1/pat/6/par/E12000008/ati/102/are/E06000036/iid/30101/age/230/sex/4> , <https://indicators.hscic.gov.uk/webview/>)

Table 1 was constructed as recommended in Estimating Local Mortality Burdens Associated with Particulate Air Pollution, PHE. The mean anthropogenic PM 2.5 data was taken from the modelled background pollution data supplied by DEFRA from 2014 to coincide with the most recently available mortality data. Mortality data for the local authorities, South East area and England were all taken from the NHS Digital Indicator Portal with the latest available being 2014. The data used was for crude mortality and the associated life years lost was estimated as 12 years per death.

This suggests that the attributable fraction of deaths due to PM2.5 is the same in Wokingham as the national average. PM 2.5 likely does not contribute directly to the number of deaths stated; rather it contributes partially to a much larger number of deaths.

1.1. Trends 2010 to 2015

Figure 2: Comparing the fraction of attributable mortality due to PM 2.5 in Wokingham, the deprivation decile comparator group and England 2010-2015



Source: [Public Health Outcomes Framework \(PHOF\)](#)

The data presented demonstrates that fraction of attributable mortality due to PM 2.5 has declined since 2010 in Wokingham, in line with the national picture.

Relative burden of PM 2.5 attributable mortality compared to other causes

Table 2: Mortality rates attributable to major preventable conditions (2015)

Area	Wokingham	South East
Indicator in PHOF	Mortality rate per 100,000	
Preventable mortality (4.03)	130.5	161.2
Preventable cancers in <75s (4.05ii)	64	73.6
Preventable CVD in <75s (4.04ii)	33.7	39.4
Premature mortality attributable to PM 2.5 (3.01)	11.2	11.7
Preventable respiratory disease in <75s (4.07ii)	9.8	15.2
Preventable liver disease in <75s (4.06ii)	9	13.1
Communicable diseases (4.08)	10.2	9.2
Suicides (4.10)	6	10.2

Source: [Public Health Outcomes Framework \(PHOF\)](#)

*=suppressed due to small number of cases

(Please note there is a proportion of overlap between some of the other preventable mortalities and that due to anthropogenic PM 2.5)

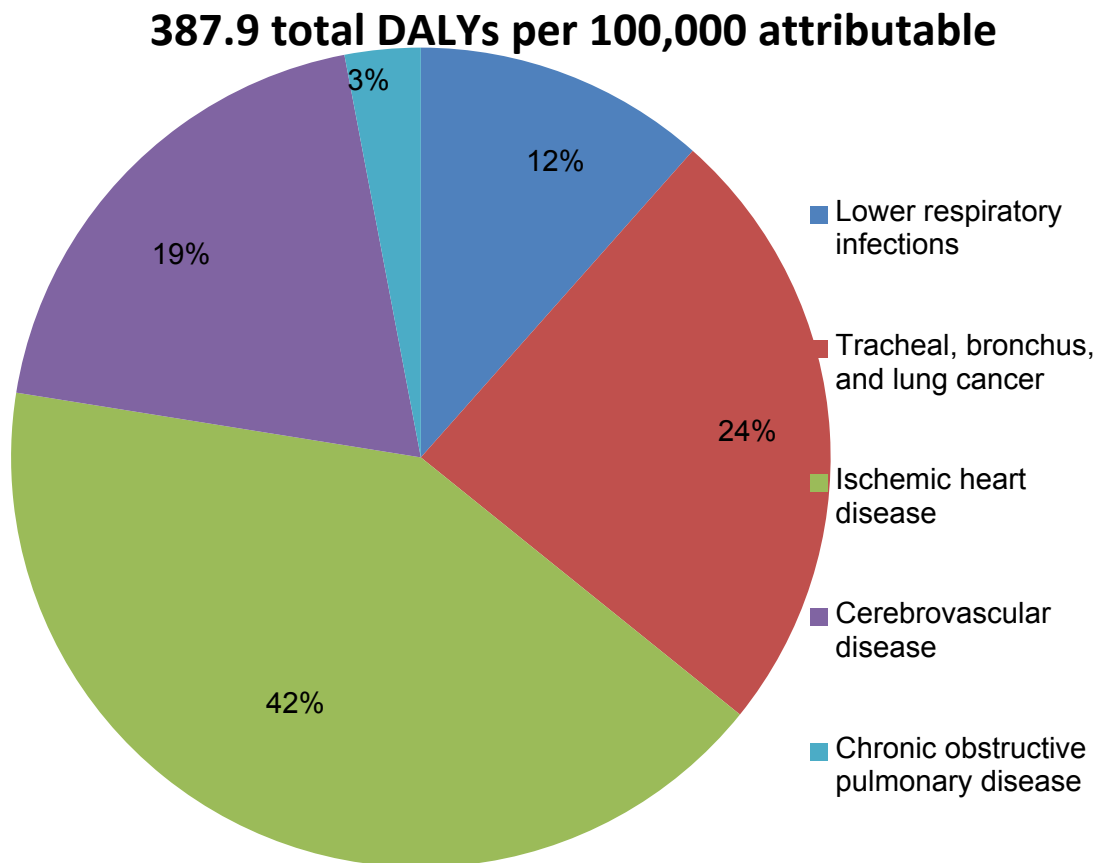
Table 2 shows the premature mortality due to anthropogenic PM 2.5 pollution, in Berkshire local authority areas, when compared to common causes of preventable mortality; such as cancers and cardiovascular disease (CVD). The rate in Wokingham is comparable to that for communicable diseases in those under 75 in Wokingham.

Table 2 was calculated by multiplying supplied attributable mortality rate by the reported premature deaths for each area from [PHE](#). The South East data was taken from PHOF and premature mortality was calculated by averaging the aggregated data for all the South East local authorities.

2. Disability adjusted life years

Disability adjusted life years (DALYs) are commonly used as a measure the overall burden of disease – the measure adds together the years of life lost due to early death, and the years spent living with disability or ill-health. The Global Burden of Disease project has estimated DALYs by age and sex for 306 health conditions with the relative impact of 79 different risk factors, including ambient particulate matter.

Figure 3: Disability adjusted life years per 100,000 population attributable to ambient particulate matter pollution in the South East region, 2013.



Data from Global Burden of Disease [Viz Hub](#)

Figure 3 shows the breakdown, as a percentage, the different health issues affected by ambient particulate matter as a percentage of the total 387.9 of DALYs in the South East region.

Lung and respiratory conditions combine to make up 39% of DALYs attributed to ambient particulate air pollution, however the largest single contributor to ill health from exposure to PM is increased risk of ischaemic heart disease (42%), followed by cancers of the lung and respiratory tract (24%), CVD (19%) lower respiratory tract infections (12%) and Chronic obstructive pulmonary disease (3%).

Although the contribution of PM air pollution to total attributable DALYs is relatively low at 2%, of overall attributable DALYs, exposure to PM is responsible for nearly a quarter (22%) of attributable DALYs secondary to lower respiratory tract infections.

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Table 3 – Comparison of DALYs for diseases contributed to by ambient particulate matter pollution (2013)

Overall DALYs South East England	Overall	Lower respiratory infections (in those <5)	Tracheal, bronchus, and lung cancer (in those ≥75)	Ischaemic heart disease (in those ≥75)	Cerebrovascular disease (in those ≥75)	Chronic obstructive pulmonary disease (in those ≥75)
Risk factor	DALYs per 100,000					
Smoking	2214.6	94.6	639.9	236.2	118.1	628.0
High body-mass index	2201.1	-	-	474.9	237.0	-
High systolic blood pressure	1766.2	-	-	749.4	424.7	-
High fasting plasma glucose	1343.5	-	-	339.1	117.6	-
Alcohol use	965.2	51.0	-	-73.7	60.8	-
High total cholesterol	818.4	-	-	767.4	51.0	-
Diet low in fruits	589.4	-	100.5	215.7	220.6	-
Drug use	425.4	-	-	-	-	-
Ambient particulate matter pollution	387.9	44.8	94.0	161.9	75.6	11.6
Iron deficiency	276.0	-	-	-	-	-
Occupational exposure to asbestos	230.1	-	168.6	-	-	-
Second-hand smoke	26.5	3.9	4.2	12.2	6.8	-
Percentage of attributable risk due to ambient particulate matter pollution	2%	22%	9%	3%	4%	2%

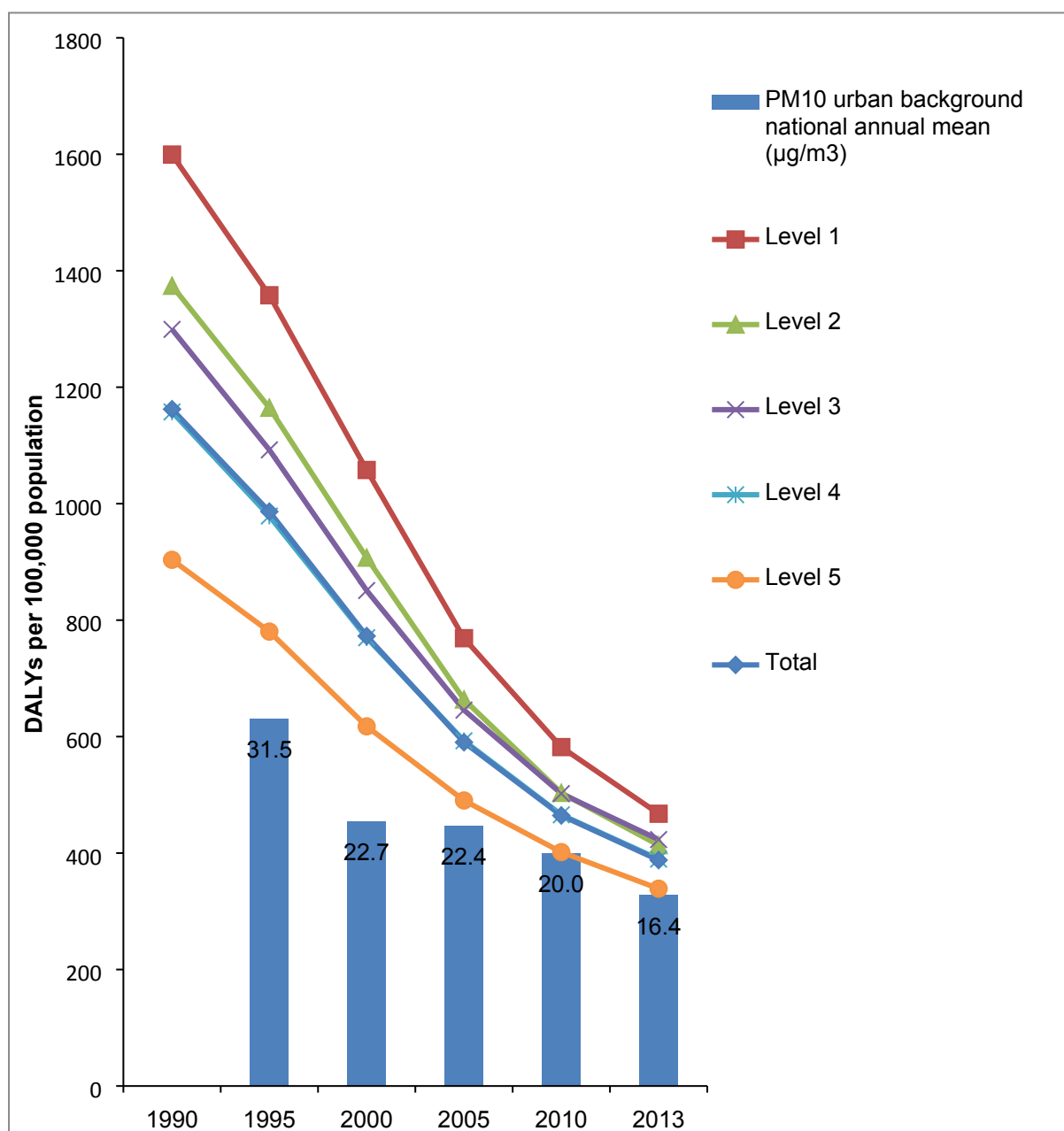
Data from Global Burden of Disease [Viz Hub](#).

2.1 Burden of disease due to PM and the relationship with deprivation

There are well-documented inequalities in the distribution of pollutants in the UK, although the relationship with deprivation is not straightforward. In general, deprived communities live in poorer-quality environments that experience higher levels of air pollution. Deprivation has also been identified as increasing susceptibility to PM in a number of separate studies. A European review reported that poorer communities were more vulnerable to the effects of PM10 exposure, including morbidity and mortality. Other factors closely associated with deprivation, such as obesity and pre-existing cardiovascular and respiratory diseases, also increase vulnerability. Less access to decent housing, green spaces, jobs and healthy food all contribute to poor health. These stressful conditions may also affect the body's response to air pollution⁵.

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Figure 4– Change in DALYs attributable to ambient particulate matter pollution in South East England from 1990-2013 by deprivation quintile – PM10 national levels are also displayed to show the relationship



Data from Global Burden of Disease [Viz Hub](#).

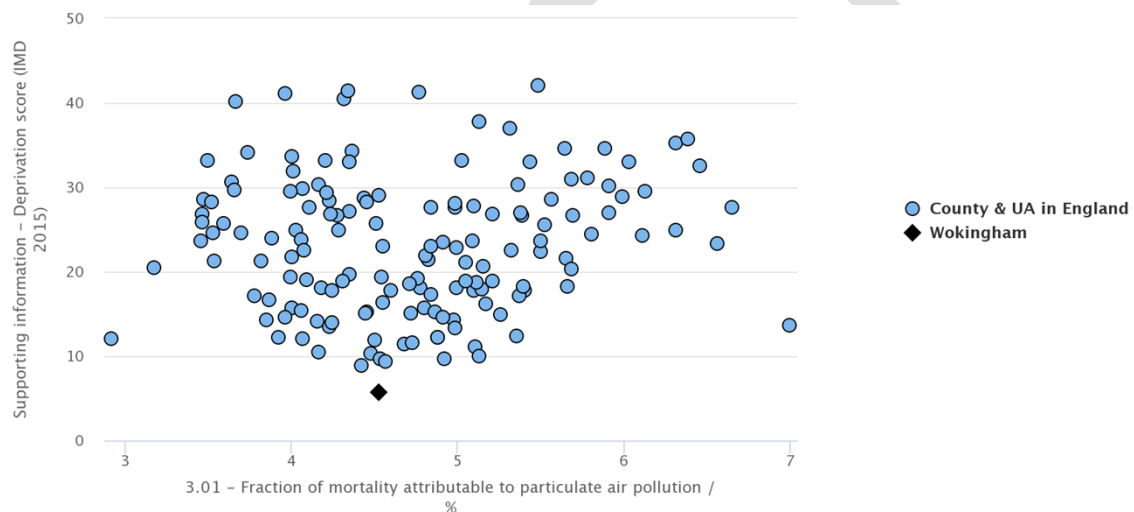
Figure 4 shows the change in DALYs attributable to ambient PM pollution from 1990 to 2013, for areas in South East England, according to the deprivation quintile (where 1 is the most deprived and 5 is the least deprived). Average national PM10 data has been included as a useful comparator. There is more historical data available for PM10 than PM2.5

Figure 4 demonstrates that DALYs attributable to PM pollution are higher in more deprived populations and shows a reduction in DALYs is correlated to reductions in PM pollution. Over the past 25 years there has been a significant reduction in morbidity attributable to PM.

This also shows that while national and local efforts to create improvements in air quality are having the desired effect in reducing the morbidity and mortality burden, there were still a significant number of DALYs attributable to ambient particulate matter pollution in 2013. There has historically been a clear relationship between increased deprivation and DALYs attributable to PM air pollution; however the gap between most and least deprived areas has narrowed substantially since 2010. We can also see that DALYs have decreased in line with the national PM10 levels

(Source: <https://www.gov.uk/government/statistical-data-sets/env02-air-quality-statistics>).

Figure 5- Scatter plot for local authorities showing fraction of mortality attributable to particulate air pollution compared with other LAs in the same deprivation decile



Data from [PHOF](#)

Figure 5 is a scatter chart of Wokingham highlighted in comparison to the LAs within the same deprivation decile from 2015.

Figure 5 demonstrates that, using 2015 data, the fraction of mortality attributable to particulate air pollution does not have a comparable relationship with deprivation. This could be due to the increased burden of other diseases in those of higher deprivation and the increased vulnerability to PM 2.5 in more deprived populations.

3.1 Effect of air pollution during pregnancy

Air pollution can affect the foetus during pregnancy, either indirectly through the health of the mother, or directly by affecting developing foetal organs and systems. These effects can have a permanent influence on growth and health throughout life. The evidence of harm due to air pollution to the foetus and the young child is not as strong as it is for adults, because the topic is relatively new and has not been so heavily researched. However systematic reviews have pointed towards PM2.5 exposure leading to low birthweight and pre-term birth⁴. It is likely that

maternal air pollution exposure interacts with other stressors in pregnancy such as poor diet, tobacco smoking and exposure to certain drugs. Moreover, the evidence for the effects of air pollution on cardiovascular disease and death in later life is very strong, so it is logical to conclude that reducing exposure to air pollution from as early an age as possible will be beneficial in order to reduce morbidity and early death³.

4.1 At the local level

The Wokingham LA population is covered by the Wokingham CCG.

6.3% of Wokingham CCG's population have asthma recorded on a GP register ([Quality and Outcomes Framework 2015/16](#)). Modelled estimates indicate that 10.8% of under 19s in the CCG have asthma, which is approximately 4,202 children. (Source: Public Health England disease prevalence models; Modelled on [NHS Digital \(2016\)](#) registered population figures)

In 2013/14, Wokingham CCG had 28 emergency admissions for asthma in under 19 year olds. This was a rate of 78 per 100,000 population, which was one of the lowest rates in the country (6th out of 221 CCGs).

1.0% of Wokingham CCG's population have COPD recorded on a GP register, although 2.4% are estimated to have the condition ([QOF 2015/16](#)). Modelled estimates indicate that 0.42% of under 19s in the CCG have COPD, which is approximately 164 children.

In 2012/13 there were 135 admissions for COPD in Wokingham CCG, a rate of 0.87 per 1000 population, lower than the England rate of 2.15 (Source: [PHE Inhale profiles](#))

In 2012/13 there were 95 admissions for asthma in Wokingham CCG, a rate of 0.61 per 1000 population, lower than the England rate of 1.21 (Source: [PHE Inhale profiles](#))

In 2014/15, there were 484 admissions for coronary heart disease in Wokingham CCG. This was a rate of 335 per 100,000 population, which was significantly lower than both the comparator group and national rates. (Source: [Public Health England \(2016\)](#); [Cardiovascular Disease Profiles](#))

In 2014/15, there were 213 admissions for stroke in Wokingham CCG. This was a rate of 153 per 100,000 population, which was similar to the comparator group and significantly lower than the national rate. (Source: [Public Health England \(2016\)](#); [Cardiovascular Disease Profiles](#))

In 2015, 22 people aged under 75 died from a respiratory disease in Wokingham CCG, which is a rate of 15 per 100,000 population. (Source: [NHS Digital \(2016\)](#))

National & Local Strategies (Current best practices)

International co-operation

In 1979, 32 countries in the pan-European region signed the UNECE Convention on Long-range Transboundary Air Pollution, creating the first international treaty to deal with air

pollution on a broad regional basis. The Convention entered into force in 1983, laying down the general principles of international cooperation for air pollution abatement.

The Convention has substantially contributed to the development of international environmental law and has created the essential framework for controlling and reducing the damage to human health and the environment caused by transboundary air pollution.

(<http://www.unece.org/environmental-policy/conventions/envlrapwelcome/the-air-convention-and-its-protocols/the-convention-and-its-achievements.html>)

EU Air Quality Directive

This sets out air quality standards and requires all Member States to undertake air quality assessment, and to report the findings to the European Commission on an annual basis. The UK has statutory monitoring networks in place to meet the requirements of these directives, with air quality modelling used to supplement the monitored data.

(<http://ec.europa.eu/environment/air/quality/legislation/directive.htm>)

National Air Quality Strategy

The air quality strategy for England, Scotland, Wales and Northern Ireland was published in 2011 and set out air quality objectives and policy options to further improve air quality in the UK.

(https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69336/pb12654-air-quality-strategy-vol1-070712.pdf)

National monitoring

Nationally, DEFRA monitors levels of a number of pollutants using the Automatic Urban and Rural Network (AURN). It includes automatic air quality monitoring stations measuring oxides of nitrogen (NO_x), sulphur dioxide (SO₂), ozone (O₃) and particles (PM₁₀ and PM_{2.5}) which provide high resolution hourly information. This information is available publically - <https://uk-air.defra.gov.uk/interactive-map>

Air Quality Management Areas (AQMA)

Since December 1997 each local authority in the UK has been carrying out a review and assessment of air quality in their area. This involves measuring air pollution and trying to predict how it will change in the next few years in order to make sure that the national air quality objectives (link in 'See Also' section) will be achieved. These objectives have been put in place to protect people's health and the environment.

If a local authority finds any places where the objectives are not likely to be achieved, it must declare an Air Quality Management Area (AQMA) there. This area could be just one or two streets, or it could be much larger.

Then the local authority will put together a plan to improve the air quality - a Local Air Quality Action Plan.

In Wokingham there are 4 AQMAs which are summarised below with links to their page on the DEFRA website:

Wokingham

AQMA	Date Declared	Pollutants
Twford crossroads	09/12/2015	Nitrogen dioxide NO ₂
Wokingham Town Centre	09/12/2015	Nitrogen dioxide NO ₂
Wokingham AQMA	07/05/2004	Nitrogen dioxide NO ₂

No Air Quality Action Plan is available for download currently. Please contact [Wokingham Borough Council](#) for further information.

Note that AQAP for both areas is in development in Wokingham - a workshop was held in February 2017.

What is this telling us?

The national and local evidence suggests that whilst air pollution levels have improved over the last couple of decades there is still a significant health burden from the current levels of pollutants.

Wokingham has a similar percentage of PM2.5 attributable deaths to the regional and national average. When compared to the comparator group of LAs in the same deprivation decile, Wokingham has results in line with the rest of the group.

The national and local data shows that areas of higher social deprivation also suffer with a higher attributable mortality and DALYs in comparison to those LAs with less social deprivation. This demonstrates that more deprived areas have a higher burden of disease in relation to PM pollution.

What are the key inequalities?

Air pollution is harmful to everyone; however it does affect some groups more:

Disability and long-term conditions - DEFRA guidance also advises that children, adults and older people with existing medical conditions such as cardiovascular or respiratory conditions, including asthma will also be vulnerable to poor air quality.

Age - Air pollution affects children more than adults because children tend to spend more time outdoors and because their lungs are still developing. Air pollution also affects older people more due to age-related loss of antioxidant defence mechanisms in the lung and elsewhere, because they are more likely to have developed chronic cardiorespiratory diseases ([The Royal College of Physicians Every Breath We Take report \(2016\)](#))

Maternity - Some pollutants, when inhaled by the mother, can cross through the placenta to the developing baby.

Deprivation - Those who live in deprived areas; which often have higher levels of air pollution and also increased vulnerability to the effects of pollutants.

What are the unmet needs/service gaps?

Continuous monitoring and compliance with EU and national requirements for reducing air pollution are still needed to ensure the long term downward trend in air pollution continues.

Increasing public awareness of the benefits of good air quality is a priority as if they are aware of the risks of air pollution and the potential benefits they may be inclined to participate in or support actions at the local level.

Recommendations for consideration:

Public health

- Improve the local population's knowledge of the impact of air pollution on health and to raise understanding that improving air quality would help to improve healthy life expectancy and reduce early death from cardio-respiratory diseases
- Tailor messages to target those members of the public particularly susceptible to air pollution such as those with asthma and chronic obstructive pulmonary disease (COPD)
- Work with others to promote initiatives to facilitate active travel (for example Healthy Schools Programmes, school travel plans; cycle to work schemes etc)
- Promote knowledge of ways to mitigate your own exposure, for example avoiding rush hour or travelling along a less polluted route.
- Raise awareness of the need to improve air quality through linking to other public health issues such as obesity and through working with Health and Wellbeing Boards to include air quality in Joint Strategic Needs Assessments and Health and Wellbeing Strategies

Local authorities

- Encourage schemes that recognise excellent levels of environmental and energy saving performance for the vehicles that operate within their area
- Introduce intelligent transport systems that maximise the efficiency of the highway network and also give real time information on traffic delays and journey times, car parking availability, and bus arrival times; together, these allow people to make better informed travel choices and also reduce traffic emissions
- Encouraging the use of vehicles with 'cleaner' fuels such as petrol or LNG rather than diesel.
- Installing electric vehicle charging points.
- Incorporate air quality into planning considerations for new developments and refurbishments
- Promote energy efficiency and sustainable transport to residents and businesses in the borough and putting in the necessary infrastructure (for example electric car charging points) to enable people to reduce the emissions they produce.

- Consider if a “clean air zone” would be an appropriate intervention in their area - https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/486636/aq-plan-2015-overview-document.pdf

See also

AQMAs - <https://uk-air.defra.gov.uk/aqma/>

National air quality objectives - https://uk-air.defra.gov.uk/assets/documents/National_air_quality_objectives.pdf

EU air quality limit values - <http://ec.europa.eu/environment/air/quality/standards.htm>

Local air quality management guidance - https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69334/pb13081-tech-guidance-laqm-tg-09-090218.pdf

Air quality alerts - <https://twitter.com/DefraUKAir>

DEFRA air quality data - <https://uk-air.defra.gov.uk/>

Annual DEFRA report - https://uk-air.defra.gov.uk/library/annualreport/viewonline?year=2015_issue_1

National emissions statistics - <https://www.gov.uk/government/statistics/emissions-of-air-pollutants>

Royal College of Physicians Summary of the health effects of air pollution – <https://www.rcplondon.ac.uk/projects/outputs/every-breath-we-take-lifelong-impact-air-pollution>

Health effects of Ozone - https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/492949/COMEAP_Ozone_Report_2015_rev1_.pdf

DEFRA NO2 Action Plan - www.gov.uk/government/collections/air-quality-plan-for-nitrogen-dioxide-no2-in-uk-2015

Lancet systematic review comparing ambient air pollution to mode of transport - <http://www.sciencedirect.com/science/article/pii/S2468266716300214>

DEFRA Air Quality briefing for Public Health Directors - <https://laqm.defra.gov.uk/assets/63091defraairqualityguide9web.pdf>

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5. The Mortality Effects of Long-Term Exposure to Particulate Air Pollution in the United Kingdom. The Committee on the Medical Effects of Air Pollutants (COMEAP) (2010) (<http://www.comeap.org.uk/images/stories/Documents/Reports/comeap%20the%20mortality%20effects%20of%20longterm%20exposure%20to%20particulate%20air%200pollution%20in%20the%20uk%202010.pdf>)
6. Fine Particulate Matter (PM2.5) in the United Kingdom. Air Quality Expert Group. DEFRA. 2012 (https://uk-air.defra.gov.uk/assets/documents/reports/cat11/1212141150_AQEG_Fine_Particiate_Matter_in_the_UK.pdf)
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Public Protection Partnership Strategic Assessment - Summary Report

Committee considering report:	Joint Public Protection Committee
Date of Committee:	19 th March 2018
Date agreed by Joint Management Board:	23 rd February 2018
Report Author:	Peter Northey

1. Purpose of the Report

To inform the Committee on the outcomes of the first Strategic Assessment (SA) of the PPP and to agree the priorities and Control Strategy (CS) to deliver against these for the 2018-19 period. These documents have been developed to inform and direct our proactive project, intervention and enforcement activities as part of our adaptation of the National Intelligence Model

2. Recommendation(s)

2.1 It is recommended that the Committee consider the Strategic Assessment and resolve that:

- a) The overarching themes identified in the Inter Authority Agreement (IAA) and set out at Appendix C remain relevant and should be retained;
- b) The functional priorities and cross cutting issues identified in the Strategic Assessment Summary at Appendix E inform service delivery for the coming year; and
- c) The draft Control Strategy at Appendix F form the preventative, information gathering and enforcement activities of the Public Protection Partnership for the coming year.

3. Implications

- 3.1 Financial:** All identified activities are undertaken as part of the core work of the PPP within the existing revenue budget, this will be scrutinised through the Strategic Tasking Group. Where appropriate grants such as support for public health related activity or investigations will be sought and used to deliver the key work streams set out in the Control Strategy. Working with other authorities as part of shared working arrangements to deliver efficiencies and effectiveness will also feature as a key priority.

- 3.2 Policy:** It is a key responsibility of the Joint Committee as set out in the IAA to set the strategic direction and priorities for the service. The first set was the approval of the Business Plan in March 2017 which laid out the operating model which included the production of a Strategic Assessment and Control Strategy. A diagram illustrating how the Strategic Assessment and Control Strategy flow from the high level priorities set out in the IAA can be found at Appendix D to this report.
- 3.3 Personnel:** There are no specific personnel issues arising out of this decision. If approved the Joint Management Board will consider the most effective structure to deliver against the priorities. Where any implications arise from this a further decision making paper will be brought to the Committee.
- 3.4 Legal:** The functions delegated to the Joint Committee by the Councils have their basis in statute. In this respect many are statutory duties placed on the Councils. In some areas (such as food safety and standards) there is a high level of prescription about how elements of the service are delivered. In most there is a high degree of flexibility for local policy making. The draft Control Strategy invites members to consider how the service will be delivered in the coming period in a manner that meets the legal obligations of the Councils.
- 3.5 Risk Management:** The emphasis on local drivers may not align with those national regulators which have an oversight function in an area of law. Where there is any divergence from national drivers these will be documented in individual project plans to ensure we can justify and defend robustly any challenges to our methodology and priority setting. Project Management Methodology will enable early identification of operational risks.
- 3.6 Property:** None specifically arising from these proposals. The issue of accommodation and rationalisation of accommodation remains a priority for the service. Members have previously considered this matter. Work continues in this

area but in order to deliver an effective service teams where possible are being co-located following staff consultation. Local delivery remains a high priority.

3.7 Other: None

4. Other options considered

None, the IAA commits the partnership to an intelligence focused delivery model

5. Executive Summary

- 5.1** The vision of the Public Protection Partnership (PPP) is:
‘To protect and support residents and legitimate business through the successful use of information and intelligence, delivering safe and healthy neighbourhoods.’
- 5.2** The Business Plan approved in March 2017 expanded on how the Vision and Aims of the PPP will be delivered through its Operating Model, an adaptation of the National Intelligence Model. An integral part of this model is the production of the Strategic Assessment to inform the setting of priorities
- 5.3** The Business Plan requires the Joint Management Team of the PPP to produce a Strategic Assessment for consideration by the Committee annually
- 5.4** The Control Strategy informs and directs our proactive project, intervention and enforcement activities
- 5.5** Communicating with our Stakeholder Audience is key to delivering the outcomes of our Control Strategy and our Business Plan, this is achieved by following our 2018-2020 Communication Strategy.

6. Conclusion

- 6.1** The Strategic Assessment and Control Strategy meet the governance requirements of the IAA and Business Plan with regard to priority setting for the delivery of the PPP services across the member authorities.

Appendices

Appendix A – Supporting Information

Appendix B – Equalities Impact Assessment

Appendix C – Inter-Authority Agreement Priorities

Appendix D – Model Flow Diagram

Appendix E – Strategic Assessment Summary

Appendix F – Draft Control Strategy

Appendix G – Draft Communication Strategy

Background Papers: Business Plan – approved by Joint Committee March 2017

PPP Strategic Aims and Priorities Supported:

The proposals will help achieve the following Public Protection Partnership aims as stated in the Inter Authority Agreement:

- 1 – Community Protection**
 - 2 – Protecting and Improving Health**
 - 3 – Protection of the Environment**
 - 4 – Supporting Prosperity and Economic Growth**
 - 5 – Effective and Improving Service Delivery**
-

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Public Protection Partnership Strategic Assessment and Control Strategy – Supporting Information

1. Background

- 1.1 The model that forms the basis of the Public Protection Partnership set about a significant shift in the way that regulatory services as they are commonly known are delivered across the Council areas. In the first instance the functions that form the statutory basis of the work of regulatory services were delegated to the Joint Committee. The operational delivery of the service was delegated to the service management. The Committee itself was tasked with setting the strategic direction of the service and considering and where appropriate approving any key plans and policies. It also has responsibility for oversight of performance and recommending budgets and fees and charges. With exception of the latter it has full delegated authority in respect of all Council and Executive functions of the Councils in respect of the relevant functions
- 1.2 The Inter-Authority Agreement that was considered by the Councils contained a set of initial priorities. These had been drawn from the cross cutting and local priorities of the Councils. A summary of these can be found at Appendix C to this report. It is recommended to the Committee that these remain relevant and provide a suitable basis for the Committee to deliver a service that is not just relevant to local communities but address areas of key concern.
- 1.3 At its meeting in March 2017 the Committee considered the Business Plan for the Public Protection Partnership. This contained within it a proposal that the service be delivered through the adoption of the National Intelligence Model (NIM). At the heart of NIM is the need for a Strategic Assessment and Control Strategy. The report today sets out the first SA and SC for the Public Protection Partnership. Both are evolving documents and are subject to renewal, updating and change to meet changing need. It is important to stress that whilst these set out the priorities and planned work activity of the service it is not to say that other day-to-day matters will not be dealt with. All contacts with the service will continue to be assessed and responded to by the multi-disciplinary Response Team within the framework set out in the Business Plan.

2. Development of the Strategic Assessment

- 2.1 A major assessment has taken place to examine demands on the service. This has included an analysis of service requests, consumer complaints about traders, and enquiries from businesses. Local, regional and national priorities have also been considered by the Intelligence Team along with emerging priorities. Sources have included government departments such as BEIS, DEFRA and DCLG, NGO's such as the Food Standards Agency, Environment Agency and Health and Safety Executive as well as co-ordinating bodies such as the National Trading Standards Board and Trading Standards South East. Local priorities have also featured centre stage and where not cross service will continue to be delivered. These include

enviro-crime and issues such as road traffic overloading and weight restriction enforcement.

- 2.2 The SA also identifies matters that are described as cross-cutting such as modern slavery and organised crime which officers from across the service may come across through the delivery of the control strategy and for which they need adequate awareness and training.

3. Development of the Control Strategy

- 3.1 Having identified the priorities service managers and lead technical specialists were asked to consider how these could be approached to deliver the best outcomes for the local community. The National Intelligence Model assumes that priorities can be approached from three angles. In the first instance what preventative action can be taken to avoid problems manifesting or developing in the first place. Key to this is communication and for this reason the service has developed a communication strategy and appointed a community engagement lead to work across the service to raise awareness and allow people to take preventative action.
- 3.2 Couple with this is the development of the intelligence picture. In some areas we wish to direct residents and businesses in the direction of self-help in others we wish to encourage reporting in order that we can build the intelligence picture, take remedial or preventative action or tackle illegal activity through enforcement. This is absolutely crucial to delivery in some areas such as doorstep crime or poor housing.
- 3.3 Finally the CS looks at how priorities can be tackled through the use of the enforcement tools available to officers. This is not just about prosecution or legal actions but also about other interventions such as disruption, improvement notices or informal routes such as advice.
- 3.4 The three strands of the PIE (Prevention, Intelligence and Enforcement) model are pulled together in the strategy to build a comprehensive picture of how the service delivers on its key priorities and those of the constituent Councils.
- 3.5 Inherent in all of this is a strong theme of partnership working with a range of organisations including Thames Valley Police, Royal Berkshire Fire and Rescue Service, RSL's, community groups, parish councils etc. It also features heavily on building and maintaining internal relationships with key services ranging from adult social care to planning and housing to public health and importantly informing and working with Elected Members and the communities they represent.

4. Delivery of the Control Strategy

- 4.1 If agreed the CS will be delivered through a programme delivery model. In essence work streams will be and are being developed into project plans based on established project management principles. These will be delivered at team and project group level and monitored by the Partnership Management Board and Service Management Team. Operational risks can be identified and the Strategic Tasking Group ensure appropriate resourcing and oversight.
- 4.2 Performance reporting will be inherent part of the programme delivery model to sit alongside other areas of performance reporting such as response times and satisfaction ratings. The IAA also contained performance themes such as reducing

detriment and measures have been and are being developed for these and an update on this appears elsewhere on this agenda.

- 4.3 Communication is key to delivering the activities outlined in order to reach the relevant stakeholder audiences in a way that helps us achieve our objectives. The project plans will inform the PPP Communications Action Plan which flows from the Communication Strategy (see Appendix G) to ensure we send the correct key messages to those people using the most appropriate channels.

Officer details:

Name: Sean Murphy
Job Title: Public Protection Manager
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Equality Impact Assessment – Stage One

We need to ensure that our strategies, policies, functions and services, current and proposed have given due regard to equality and diversity as set out in the Public Sector Equality Duty (Section 149 of the Equality Act), which states:

- “(1) A public authority must, in the exercise of its functions, have due regard to the need to:**
- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;**
 - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; This includes the need to:**
 - (i) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;**
 - (ii) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;**
 - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it, with due regard, in particular, to the need to be aware that compliance with the duties in this section may involve treating some persons more favourably than others.**
- (2) The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.**
- (3) Compliance with the duties in this section may involve treating some persons more favourably than others.”**

The following list of questions may help to establish whether the decision is relevant to equality:

- Does the decision affect service users, employees or the wider community?
- (The relevance of a decision to equality depends not just on the number of those affected but on the significance of the impact on them)
- Is it likely to affect people with particular protected characteristics differently?
- Is it a major policy, or a major change to an existing policy, significantly affecting how functions are delivered?
- Will the decision have a significant impact on how other organisations operate in terms of equality?
- Does the decision relate to functions that engagement has identified as being important to people with particular protected characteristics?
- Does the decision relate to an area with known inequalities?
- Does the decision relate to any equality objectives that have been set by the council?

Please complete the following questions to determine whether a full Stage Two, Equality Impact Assessment is required.

What is the proposed decision that you are asking the Committee to make:	To approve the Public Protection Partnership Strategic Assessment and Control Strategy
Summary of relevant legislation:	All legislation listed under the schedule to the Inter Authority Agreement
Does the proposed decision conflict with any of the Council's key strategy priorities?	No
Name of assessor:	Peter Northey
Date of assessment:	09.03.2018

Is this a:		Is this:	
Policy	No	New or proposed	
Strategy	Yes	Already exists and is being reviewed	New
Function	Yes	Is changing	No
Service	Yes		

1. What are the main aims, objectives and intended outcomes of the proposed decision and who is likely to benefit from it?	
Aims:	To protect and support residents and legitimate business through the successful use of information and intelligence, delivering safe and healthy neighbourhoods
Objectives:	To target the PPP resources at the areas of activity that are causing the greatest community detriment, be that financial, health or general wellbeing, to achieve better outcomes for those being disadvantaged.
Outcomes:	Protecting the more vulnerable members of our communities. Empowering communities to tackle issues that cause them concern. Reducing the regulatory burden on legitimate businesses
Benefits:	Improved health and wellbeing for communities while providing an environment where legitimate business can flourish.

2. Note which groups may be affected by the proposed decision. Consider how they may be affected, whether it is positively or negatively and what sources of information have been used to determine this.

(Please demonstrate consideration of all strands – Age, Disability, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion or Belief, Sex and Sexual Orientation.)

Group Affected	What might be the effect?	Information to support this
Age	Those targeted by criminal activity due to their age will receive greater support from the PPP than others in the community: positive impact	Door step crime and mass mailing fraud are known to target older members of society
Disability	none	
Gender Reassignment	none	
Marriage and Civil Partnership	none	
Pregnancy and Maternity	none	
Race	Organised Crime Groups (OCGs) are known to form amongst persons of similar ethnicity	Door step crime is an identified issue amongst the travelling community
Religion or Belief	none	
Sex	none	
Sexual Orientation	none	

Further Comments relating to the item:

It is acknowledge that targeting of unlawful activity may result in financial or custodial penalties against the perpetrators. While this may be an adverse impact on them, it provides the inverse for both the victim and the wider community.

The individual activities which form the Control Strategy may require Impact Assessments in their own rights and will be assessed on a project basis within the initial project plan.

3. Result

Are there any aspects of the proposed decision, including how it is delivered or accessed, that could contribute to inequality?	No
--	-----------

Please provide an explanation for your answer:
OCGs will be targeted because of identified criminal activity, not ethnicity

Will the proposed decision have an adverse impact upon the lives of	No
--	-----------

people, including employees and service users?	
Please provide an explanation for your answer:	

If your answers to question 2 have identified potential adverse impacts and you have answered 'yes' to either of the sections at question 3, or you are unsure about the impact, then you should carry out a Stage Two Equality Impact Assessment.

If a Stage Two Equality Impact Assessment is required, before proceeding you should discuss the scope of the Assessment with service managers in your area. You will also need to refer to the [Equality Impact Assessment guidance and Stage Two template](#).

4. Identify next steps as appropriate:	
Stage Two required	No (see note above concerning individual activities and the need for further assessment)
Owner of Stage Two assessment:	
Timescale for Stage Two assessment:	

Name: Sean Murphy

Date: 09/03/2018

Please now forward this completed form to Rachel Craggs, Principal Policy Officer (Equality and Diversity) (rachel.craggs@westberks.gov.uk), for publication on the WBC website.

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Extracts from the PPP Business Plan 2017 and the Inter Authority Agreement (IAA)

Business Plan 2017

2. VISION

To protect and support residents and legitimate business through the successful use of information and intelligence, delivering safe and healthy neighbourhoods.

3. MISSION

The purpose of the service is to: -

- Provide people information to enable them to make informed decisions and understand their rights and responsibilities.
- Create an atmosphere where legitimate and compliant businesses can thrive and not have their interests undermined by those who choose not to comply.
- Preserve the health, wellbeing and safety of the communities we serve.

4. VALUES

Our values have a major influence on the way we want to be seen:

- Objectivity in decision making.
- The desire to meet the needs of the community.
- An approach to service delivery which is professional on every level.

PUBLIC PROTECTION PARTNERSHIP

Stated Aims – (IAA sch5 and PPP Business Plan section 5)

1	The sharing of expertise and best practice
2	The creation of greater resilience and robustness to cope with unforeseen challenges such as disease outbreaks, large scale investigations or loss of key personnel
3	Sharing and developing resources to drive efficiency and effectiveness including systems and areas of specialist knowledge such as legal, finance and investigative skills
4	Eliminating duplication by needing to do things only once across all locations and elements of the service for example procedures and standard documentation
5	Building on the success and innovation of the partners to agreement and learning from each other and implementing that learning
6	The effective use of communication to protect communities and enhance the reputation of the Partnership and the Councils
7	Reduce costs by operating jointly
8	Making effective use of partnership funding, service specific grants and monies received from the Proceeds of Crime Incentivisation Scheme
9	Development of the Service in ways which drive further efficiencies and service improvements
10	Playing our role and enhancing our reputation on a regional and national level

Key Performance indicators 2017-18 (IAA sch5)

1. Decreasing level of detriment suffered by residents
2. Increase level of compliance in critical areas
3. Effective budget management and use of resources
4. Preventing residents from harm through expanding the use of social media and key communication channels
5. Maintain high levels of customer and business satisfaction

PUBLIC PROTECTION PARTNERSHIP

Priorities (IAA sch5)

1. Community Protection

- a. Contributing to the effective tackling of crime and disorder
- b. Tackling the issues that cause the greatest harm to individuals and communities
- c. Protection of the most vulnerable residents
- d. To act as champion for the local area
- e. Providing safeguards to the community through an effective licensing service

2. Protecting and Improving Health

- a. Protecting people from harmful products and services (including food)
- b. Allowing residents to make informed choices on matters that impact their health
- c. Developing and delivering initiatives designed to improve and enhance health and wellbeing of individuals
- d. Supporting relevant priorities identified by local Strategic Joint Needs Assessments
- e. Tackling the causes of health inequalities

3. Protection of the Environment

- a. Protecting the environment from harm
- b. Tackling those that chose to harm the environment

4. Supporting Prosperity and Economic growth

- a. Supporting compliant local businesses to thrive through the provision of advice and guidance
- b. Protecting businesses from illegal activities that damage their economic interests
- c. Supporting the rural economy

5. Effective and Improving Service Delivery

- a. Implementation of the national intelligence model to identify and effectively tackle priority areas
- b. Building effective working relationships with key partners within the Councils to deliver the key objectives of the Service and the Councils
- c. Building effective relationships with key external partners including Thames Valley Police, Royal Berkshire Fire and Rescue Service, housing providers, other local authorities, national and regional delivery bodies and community based groups and organisations
- d. Improvement and enhancement of the service through effective evaluation and quality management
- e. Communication well with local people and businesses

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Vision – To protect and support residents and legitimate business through the successful use of information and intelligence, delivering safe and healthy neighbourhoods

Inter Authority Agreement

Core Priority Themes:

- Community Protection**
- Protecting and Improving Health**
- Protection of the Environment**
- Supporting Prosperity and Economic Growth**
- Effective and Improving Service Delivery**

Each theme has a number of objectives associated with them

Business Plan

Mission:

Informed and empowered public
Thriving business community
Preserving health, wellbeing and safety

Values:

Objectivity in decision making
The desire to meet the needs of the community

An approach to service delivery which is professional on every level

Effective use of communication to protect communities and enhance the reputation of the Partnership and the Councils

Strategic Assessment

Doorstep crime and mass marketing
eCrime (inc IP)
Second Hand car sales and car repairs
Health Promotion amongst the young (tobacco and alcohol focussed)
Safety
Fulfilment Houses
Air Quality
Development Control
Commercial and Environmental
Noise
Housing Conditions including mobile and static homes
Statutory Nuisance
Health and Safety in the work place
Food Safety at business premises and in the home

Control Strategy

Work on Strategic Priorities focussed on:

- Preventative Actions
- Information Gathering
- Enforcement

Outcomes to demonstrate IAA Core priority Themes and their associated objectives are being met

Planned Work Activity

Project planning methodology
Reference to IAA and Control Strategy core themes
Cover all areas of work which are still being undertaken by the service to ensure resources are managed and work is focussed on outcomes

Joint Public Protection Committee

Remit: Executive decision making on behalf of all Partner Authorities, setting of policy and service priorities, reviewing performance information and recommending budget proposals to the Partner Authorities
Meet quarterly

Joint Management Board

Remit: Advises the Committee on all matters relevant to the delivery of the service and local needs of the populations being served. Monitoring performance against agreed objectives.
Meet Monthly

Cross cutting Issues

Vulnerable Persons, Serious & Organised Crime, Modern day slavery and eCrime

Joint Management Team – Operational Decision Making
Implementation of operating model
Project Management Methodology and Quality Management

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STRATEGIC ASSESSMENT SUMMARY

February 2018



2018

INTRODUCTION AND BACKGROUND

When the Public Protection Partnership (PPP) was formed in 2016 the Inter Authority Agreement (IAA) signed by all parties set out, amongst other elements, the aims and objectives for the new Service. These were further articulated in the PPP Business Plan¹ produced for the Joint Management Committee, the body providing Member oversight of the PPP, in 2017.

The operating model for the PPP is based on the National Intelligence Model² and how this is applied to the PPP is described in a report³ produced for the Management Board in July 2017. The Business Plan acknowledges (section 9.1.2) that with the resources available across the PPP, there will need to be decisions on prioritising the statutory functions that can be delivered at any one time. However, through the Operating Model the Service will ensure those priorities will deliver the most beneficial outcomes for our communities.

This is achieved through the production of a Strategic Assessment (SA) where past demands from consumers, businesses, residents, other regulators (internal and external) and other local, regional and national government departments and agencies are analysed alongside the outcomes of previous activities undertaken by the Service. The operating model details how the Service will initially handle all the demands (complaints, requests, statutory functions, etc.) made upon it.

The SA is an integral part of the business planning process and is used to drive the strategic planning, enable resources to be allocated where they can be most effective and to assist in the development of the Control Strategy; the planned work activities to deliver on prevention, intelligence and enforcement aspects of the identified priorities.

The operating model explains how future demands will be handled to ensure we are able to deliver on those priorities while monitoring demands to identify new or emerging trends that might have a detrimental impact on the community. Monitoring takes place through a tactical tasking process which

¹ Business Plan 2017 page 5 and the Inter Authority Agreement Schedule 5

² National Intelligence Model: National Centre for Police Excellence 2000;
<http://library.college.police.uk/docs/npia/NIM-Code-of-Practice.pdf>

³ Public Protection Partnership: Operating Model

enables us to allocated resources where they are most needed and can have the greatest impact. The flow of contacts through the service, where they are directed and the manner in which they are dealt with were illustrated in a document produced as Appendix I to the Operating Model report; this is reproduced in the appendices to this report.

This shows that all new contacts receive an initial assessment to determine if immediate action is required, that is;

- There is an imminent threat to health or safety where a failure to act could result in further injury
- There is a crime in progress, or
- Failure to act following a crime could result in loss of evidential material.

In such circumstances the Response Team will take the appropriate action.

Where there is no immediate threat/risk and the matter falls within the planned work activity of an operational team, it is passed directly to them.

If it is not part of the planned work activity, the Response team will assess the issue against the Service priorities and provide the appropriate level of advice or assistance. It is recognised in this model that not all matters will receive a reactive response from the Service. These low risk issues are monitored as part of the Intelligence function of the Service and inform future planning. If monitoring shows the level of risk is increasing this can be considered at the regular tasking meetings, where further analysis or planned work activities can be sanctioned.

Key Findings

- Current in-house technology, and the use of it, is not 'fit for purpose'.
- Access to the PPP for advice and assistance, together with the manner in which the PPP gathers information, needs to reflect the changing market landscape.
- All interactions with a business should be reviewed and, wherever possible, undertaken as a joint venture by the PPP teams.
- Team plans must demonstrate clearly what priorities they are designed to meet, the objective of the interventions planned and provide detail of the qualitative assessment to be undertaken to assess whether the objective was met.
- Methodologies should be developed whereby the impact of the actions taken by the PPP can be evaluated and reported.

Priority Area Analysis

Trading Standards

- Interventions deployed to reduce the level of complaints relating to used cars should be reviewed to ensure they deliver the desired outcome.
- Use of the Enterprise Acts should be explored with the Case Management Unit to ensure we can deploy the full range of sanctions against persistent offenders.

Licensing

- The team must develop standard processes across the databases to allow for meaningful analysis and targeting of planned work.
- The licensing team interventions must be delivered in conjunction with other functions across the PPP to maximise their impact and outcome.

Environmental Quality

- The Knowledge and understanding of areas likely to be impacted upon by future development needs to be mapped against the areas currently identified as close to the statutory limits

Residential

- Use of innovative solutions to accept reporting of high volume demands such as Pests and Noise should be explored.

Commercial

- The team has identified projects based on the HSE Code and they should take a wider PPP view of risk when compiling proactive work initiatives
- Inspection/audit programmes are developed and driven by local factors designed to produce qualitative outcomes
- Further analysis is undertaken to see what efficiencies could be delivered for both businesses and the PPP by the wider use of cross-function audits.

Control Strategy Priorities

It is recommended that the actions identified in the Control Strategy are aligned to the current themes of the IAA;

- Community Protection
- Protecting and Improving Health
- Protection of the Environment
- Supporting Prosperity and Economic growth
- Effective and Improving Service Delivery

It is recommended that the following Control Strategy priorities are set for the operational teams

A. Trading Standards

- Doorstep crime and mass marketing
- eCrime (including Intellectual Property)
- Second hand car sales and car repairs
- Health promotion amongst the young (tobacco and alcohol focused)
- Product Safety

B. Environmental Quality

- Air Quality
- Development Control
- Commercial and Environmental Noise (Statutory Nuisance)

C. Residential

- Housing conditions, including mobile and static homes
- Statutory Nuisance impacting on Environmental Living Conditions

D. Commercial

- Health and Safety in the work place
- Food Safety at businesses premises and in the home

Cross Cutting Issues

It is recommended that following cross cutting themes/enablers are considered as they impact on each priority area:

- **eCrime**
- **Serious and Organised Crime Groups**
- **Vulnerable persons**
- **Modern Day Slavery**

Local Agreements

The PPP is committed to providing support to individual authorities in the following areas:

- Environmental Crime - Bracknell Forest, enforcement capability
- Environmental Crime - West Berkshire, enforcement support
- Weight Restrictions – West Berkshire
- Good Food Challenge – West Berkshire

PPP – CONROL STRATEGY: PRIORITY CODES

CORE

- CP1 Community Protection
- CP2 Protecting and Improving Health
- CP3 Protection of the Environment
- CP4 Supporting Prosperity and Economic growth
- CP5 Effective and Improving Service Delivery

Cross Cutting Issues

- CC1 Vulnerable persons
- CC2 Serious and Organised Crime Groups
- CC3 eCrime
- CC4 Modern Day Slavery

Strategic Assessment

- SA1 Doorstep crime and mass marketing
- SA2 eCrime (including Intellectual Property)
- SA3 Second hand car sales and car repairs
- SA4 Health promotion amongst the young (tobacco and alcohol focused)
- SA5 Product Safety
- SA6 Air Quality
- SA7 Development Control
- SA8 Commercial and Environmental Noise (Statutory Nuisance)
- SA9 Housing conditions, including mobile and static homes
- SA10 Statutory Nuisance impacting on Environmental Living Conditions
- SA11 Health and Safety in the work place
- SA12 Food Safety at businesses premises and in the home

SA PRIORITY: SA1		Doorstep crime	CORE PRIORITY: CP1	CC IMPACT: CC1/CC2/CC4
Prevention	Promotion of successful prosecutions, interventions and the value of those interventions via press releases and social media to increase public awareness			
	Expand reach of partnership working with non-enforcement bodies to improve education to potential victims			
	Ensure those at risk are referred to the appropriate agencies to reduce the likelihood of them becoming victims			
	Improve public awareness regarding Doorstep Crime and consumer rights via open events, social media and website			
	Promote Trader approved schemes to improve consumer choice			
Intelligence	Further develop our relationship with TVP to enhance the training of their officers on consumer issues			
	Improve relationships with our legitimate traders to encourage them to report incidents of suspect rogue trading			
	Improve victim profiling to better target both our intervention and preventative activities.			
	Further develop our relationship with the CTSI NIH and RIO and GAIN network to increase understanding of the OCGs operating in our area			
	Improve reporting gateways for public and trade to increase amount of intelligence flowing into the PPP			
Enforcement	Improve our response protocol with TVP through the development of the Response team			
	Develop use of alternative civil sanctions alongside those already deployed against these traders.			
	Review witness care protocols to ensure appropriate support is provided to victim, ensuring they are confident to support our court actions			
	Enhance participation in national operations (i.e. Rogue Trader week) to increase detection of perpetrators			
	Increase our resources to ensure best evidence is captured in accordance with ABE principles			
SA PRIORITY:		eCrime (including Intellectual Property)	CORE PRIORITY:	CC IMPACT:

SA2		CP1/CP4	CC3
Prevention	Promotion of successful interventions via press releases and social media to increase public awareness.		
	Improve public awareness regarding eCrime via open events, social media and website particularly in relation to copycat websites and online scams		
	Encourage better awareness particularly from smaller traders of the potential dangers regarding eCrime		
	Overt membership of selling forums and active engagement with potential sellers of IP related goods		
	Engage with and inform vulnerable consumers who have been identified as victims of online scams		
Intelligence	Further develop our relationship with TVP by including IP awareness with their officers		
	Improve relationships with our legitimate traders to encourage them to report incidents particularly in relation to IP related offences		
	Improve reporting gateways for public and trade to increase amount of intelligence flowing into the PPP		
	Use of alternative information platforms to gain intelligence regarding the nature and prevalence of eCrime in particular market sectors		
Enforcement	Enhance participation in regional projects (i.e. TSSEL) to increase detection of issues and effectiveness of projects		
	The use of intelligence guided projects to target problem product types and sales environments		
SA PRIORITY:	Second hand car sales and car repairs	CORE PRIORITY: CP4	CC IMPACT:

SA3				CC1
Prevention	Promotion of successful interventions via press releases and social media to increase public awareness			
	Improve public awareness of consumer rights regarding via open events, social media and website			
	Enhance knowledge of the trade in relation to consumer law, particularly with regard to the 'sales practice' type offences			
	Promote Trader approved schemes to improve consumer choice			
Intelligence	Improve reporting gateways for public and trade to increase amount of intelligence flowing into the PPP			
	Improve relationships with our legitimate traders to encourage them to report suspected problem traders			
	Use of alternative information platforms to gain intelligence regarding the nature and prevalence of issues in particular market sectors			
	Analysis of targeted interventions to better understand the effectiveness of those interventions and improve future operations.			
Enforcement	The use of targeted interventions against traders generating a disproportionate number of complaints for the size of operation			
	The use of intelligence guided projects to target specific problem areas of the market sector			
	Enhance participation in regional projects (i.e. TSSEL) to increase detection of issues and effectiveness of projects			
	Consider the use of alternative enforcement regimes (i.e. assurances, post conviction orders) to tackle persistent offenders			
SA PRIORITY:		Health promotion amongst the young	CORE PRIORITY:	CC IMPACT:

SA4		(tobacco and alcohol focused)	CP2	CC1
Prevention	Improve awareness amongst the young regarding the dangers of smoking and alcohol using a range of delivery methods including e-learning, presentations in schools, theatre performances etc.			
	Work with partner organisations to ensure the robustness of the adopted drugs and alcohol control strategy			
	Proactive engagement with traders, partners and young people through Community Alcohol Partnerships			
	Engage with parents and target groups to influence their behaviour around vulnerable groups such as young people			
	Work with our partners in the local Tobacco Control Alliance to reduce levels of tobacco consumption across the area			
	Reduce proxy purchasing and general supply of age restricted to those under the relevant age			
Intelligence	Conduct school attitudinal survey across the PPP area to monitor the impact of adopted strategies			
	Improve reporting gateways for public and trade to increase the amount of intelligence flowing into the PPP regarding the illegal sale of age restricted products to young people			
	Engage with partner organisations (i.e. Police , HMRC, educational establishments) to ensure that all intelligence regarding sales of age restricted products is shared with the PPP			
Enforcement	Engage in a programme of test purchasing to ensure that age restricted products are not easily available			
	Where offences are detected, liaise with partner organisations to ensure the proportionate and necessary action, such as licence reviews, suspensions and/or prosecutions, is deployed in a consistent manner			
	The use of intelligence guided projects to target problem product types and sales environments			
	Enhance participation in regional and national projects			
SA PRIORITY:		Safety	CORE PRIORITY:	CC IMPACT:

SA5		CP1 / CP4	CC1/CC3
Prevention	Promotion of successful interventions via press releases and social media to increase public awareness		
	Improve public awareness regarding product safety via open events, social media and website		
	Encourage better awareness from the traders in our area, particularly from smaller importers, of the potential dangers regarding product safety and goods, particularly from outside the EU		
	Engage with national awareness days to raise consumer awareness particularly in relation to goods imported from outside the EU		
Intelligence	Improve relationships with our legitimate traders / importers to encourage them to report incidents		
	Improve reporting gateways for public and trade to increase amount of intelligence flowing into the PPP		
	Use of alternative information platforms to gain intelligence regarding the nature and prevalence of product safety issues in particular market sectors		
	Investigation of alternative selling platforms to identify small scale traders based in the PPP area		
Enforcement	The use of intelligence guided projects to target problem product types and sales environments		
	Enhance participation in regional projects (i.e. TSSEL) to increase detection of issues and effectiveness of projects		

SA PRIORITY: SA6	Air Quality	CORE PRIORITY: CP2 (CP3)	CC IMPACT: CC1
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Prevention	Liaise with the relevant Local Planning Authorities (LPAs) during their current review of Local Development Plans to ensure that Air Quality is high on the agenda and is a main consideration when bringing forward new development.
	Work with the relevant LPAs on publishing a 'Planning and Air Quality Document' to provide guidance on how developers should assess the potential impact of a development on air quality and provide advice on minimising impacts. The document will also assist planners and developers in assessing the potential 'damage' to air quality in terms of the financial cost and identify appropriate measures to offset the impacts of this damage.
	Work with the PPP Communications Manager to ensure clear advice and information on Air Quality is available on the PPP web site. Including information on events such as 'Air Quality Week' and advice on what individuals, schools and businesses can do to limit the impact of their activities on air quality, improving air quality and reducing their exposure to air pollution.
	Promote the air quality monitoring undertaken, publishing the results so residents are better informed about the air quality where they live.
	Develop a PPP Air Quality Strategy which will set out how we intend to contribute to the protection and improvement of local air quality across the three areas. As part of the Strategy we will facilitate actions to protect air quality/ reduce exposure to air pollution with other stakeholders including Highways, Transport, Public Health and the Public Health and Well Being Board
	We will continue to make positive progress with the various Air Quality Action Plans established for each AQMA. An annual progress report on the planned activities will be produced and published along with the annual ASRs submitted to Defra for approval
elligence	On-going collection of real time and passive AQ monitoring data across the three authorities to monitor air quality concentrations and measure the impact of air quality mitigation measures and help us to identify potential areas of concern that may require attention in the future

		Collection and use of data including, for example, results of air quality modelling and assessments carried out by developers	
		We will respond to information from residents and other stakeholders about areas of concern that may require monitoring and assessment	
		Respond to complaints from residents, about emissions from potentially polluting industrial processes	
		Assess and respond to intelligence /complaints about possibly polluting industrial processes provided by the public and various agencies (e.g. EA, RBFRS etc) and by PPP district officers and other Council officers	
Enforcement		Enforcement of industrial processes that are or should be operating under a PPC permit including, for example, prosecution for breach of conditions on a permit, for operating without the benefit of a permit In the extreme this could lead to revocation of permits to stop polluting businesses from operating	
		Carry out investigation and enforcement under the statutory 'smoke nuisance' provisions of the Environmental Protection Act 1990 and under the Clean Air Acts.	
		Perform compliance monitoring and inspections of industrial processes permitted under PPC Regulations. The frequency of inspections will be based on the level of risk posed by each process and their compliance history to maximise the impact of our actions. Ensuring compliance with permit conditions will help prevent incidents that could cause significant localised air pollution	
SA PRIORITY: SA7	Development Control	CORE PRIORITY: CP2,CP3, CP4, CP5	CC IMPACT: CC1

Prevention	<p>Provide timely responses to planning consultations that focus on the protection of the health, the environment and the general amenity of future residents and of exiting residents and businesses in the vicinity of proposed new development. This could include recommendations relating to noise, air quality, land contamination, odour etc. and where necessary, recommend refusal.</p>
	<p>We will assess condition discharge applications to ensure that the conditions that we have recommended have been applied, complied with and have been effective</p>
	<p>We will liaise on a regular basis with colleagues in each Local Planning Authority and provide assistance, where necessary, at planning committee and appeal hearings to help ensure the best outcomes for residents and local businesses.</p>
	<p>We will develop a number of planning related guidance documents in conjunction with the LPAs relating to noise, air quality and the development of potentially contaminated brown field sites. This will help to ensure a consistent approach to our assessment of planning consultations across the three authorities.</p>
	<p>We will work with the PPP Communications Manager to ensure that informative and clear advice and information on EH planning matters is provided on the PPP web site including, for example, FAQs and advice to developers on key issues such as noise, air quality and the development of brownfield sites</p>
	<p>We will respond to Local Plan consultations from each local authority on proposed future development sites to make sure they are sustainable in terms of the protection of health, well-being and the environment and the general amenity of future residents and businesses in the vicinity.</p>
	<p>We will seek to develop a single standard set of planning recommendations acceptable to each LPA and which can be used to improve the efficiency of our responses.</p>
Intelligence	<p>Where appropriate we will provide assistance and support to planning enforcement teams as and when required and will share any relevant intelligence with them</p>

	Regular liaison with the Development Control Management teams in each authority to share intelligence on sites and emerging issues
	Sharing information with other PPP teams about proposed future development that may have an impact on their activities e.g. house conversions to HMOs, new food businesses, businesses run from residential properties (car repairs etc.)
Enforcement	As a consultee to each LPA our enforcement activity is limited. We will refer matters of concern to the three planning enforcement teams and when appropriate, assist with their investigations

SA PRIORITY: SA8	Commercial and Environmental Noise (Statutory Nuisance)	CORE PRIORITY: CP2, CP3	CC IMPACT: CC1
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Prevention	Work with the PPP Communications Manager to provide information and advice on the PPP web site about commercial noise to help empower customers to resolve commercial noise issues without our intervention. Information will be provided to assist commercial businesses minimise their noise impact on the community
	We will liaise with the local planning authorities to ensure that appropriate conditions are imposed to minimise the impact of noise from or affecting new developments both during the constructions and operational phases (see above)
	As a Responsible Authority for the public nuisance licensing objective, we will liaise with licence holders and local residents to ensure that noise and disturbance from licenses premises and activities is minimised. We will also, on a 'risk assessed' basis, monitor various major events that happen throughout the year
	We will work with businesses to secure compliance in the most cost effective manner, including developing noise management plans where appropriate, including approval of Section 61 applications for large construction projects.
Intelligence	Assessment of information provided by residents / complainants. Intelligence already gathered by other PPP teams
	Sharing of information / intelligence we gather with other agencies / teams
	Feedback from business will be analysed to promote best practice and to ensure continuous improvement.
	Feedback from customers will be analysed to ensure continuous improvement.
Enforcement	Service of abatement notice under s 80 of Environmental Protection Act 1990. Prosecution for breach of abatement notices. Carry out works in default
	Call for review of premises licences or participate in reviews called by others if we consider it appropriate and the issues relate to PN
	Carry out pro-active risk based monitoring of commercial activities e.g. major events and providing feedback to the relevant enforcing authority.
	Complaints about more technical and complex commercial and environmental noise requiring longer term interventions will be undertaken; applying best practice to ensure a consistent approach across the three authorities.

SA PRIORITY: SA9	High Rise Property Fire Safety	CORE PRIORITY: CP1, CP5	CC IMPACT: CC1
Prevention	Participation in strategic and operational meetings involving multiple agencies across PPP		
	Support promotion of successful interventions via wider public access groups such as press releases and social media		
	Participate in practical visits to certain types of buildings providing safety advice and reassurance to the residents of those buildings		
	Increase team member experience & existing knowledge to ensure best use of appropriate legislation.		
Intelligence	Further relationships with internal and external partner agency's to enhance the training of their officers and own officers on Residential team (and broader) PPP issues.		
	Improve reporting gateways for public, partner agencies and other operational teams to increase the amount of intelligence flowing into the PPP.		
	Develop information that would inform a programme of inspection prioritising higher risk premises.		
Enforcement	Increase our resources to ensure best evidence is captured in accordance with ABE principles.		
	Use of alternative civil sanctions alongside those already in existence.		
	Adoption and implementation of a memorandum of Understanding across the PPP for enforcement purposes		

SA PRIORITY: SA9	Licensing Activity	CORE PRIORITY: CP2	CC IMPACT: CC1
Prevention	Ensure officers are equipped to share knowledge with businesses, tenants and partners in a continually changing environment		
	Support promotion of successful interventions via wider public access groups such as press releases and social media to ensure awareness and compliance		
	Use opportunities during programmed visits to certain types of buildings to provide safety advice and reassurance to the residents and managers of those properties		
	Improve relationships with our legitimate businesses to encourage them to seek above minimum standards. E.g. consider LL forums webinars, approval schemes etc.		
	Undertake a programme of inspection to provide on-site advice		
Intelligence	Improve the standard of reporting to capture outcome focused data such as hazards and quantifiable frequency of inspection data		
	Participate in the tasking process and information sharing from the all PPP teams		
	Utilise existing data reporting and tasking process to identify incidents of suspected non-conformity.		
	Participation in strategic and operational meetings involving multiple agencies across PPP		
	Utilise a programme of inspection to inform on the profile of relevant person or area		
Enforcement	Introduce a process of ensuring Council obligations are met, e.g. post site rules on the PPP website, maintaining public registers, processing licensing applications.		
	Carrying out a range of sanctions available where non-conformity or non-compliance with appropriate conditions or legislation		
	Enhance participation in local operations to increase detection of perpetrators		
	Review FTT and appeals protocols to ensure appropriate support is provided to all concerned in enforcement matters		

SA PRIORITY: SA10	Animal Warden and Pest Control	CORE PRIORITY: CP3	CC IMPACT: CC1
Prevention	Support promotion of successful interventions via wider public access groups such as press releases and social media to ensure awareness and compliance.		
	Utilise the opportunity of survey to raise awareness in rodent control		
	Present community fairs to raise awareness in dog control matters across PPP		
	Roll out mapping of complaints in rodent activity and dog fouling across PPP		
	Review the provision of animal warden services across PPP		
Intelligence	Participation in strategic and operational meetings involving multiple agencies across PPP.		
	Carry out community surveys to ascertain issues around problematic rodent control		
	Roll out on-line reporting and mapping system across PPP		
	Utilise data capture from UNIFORM and FLARE to identify trends in stray dog incidents		
	Analysis of PPP on-line reporting portals to improve targeting of resources		
Enforcement	Carry out enforcement of relevant legislation using a range of sanctions available to secure positive community and public health based outcomes.		
	Provide a review of the fee and charging regime to ensure consistent cost recovery sanctions within PPP		
	Standardise response to service requests received by PPP		

SA PRIORITY: SA9		Unlicensed regulated activity	CORE PRIORITY: CP2	CC IMPACT: CC1
Prevention	Support promotion of successful interventions via wider public access groups such as press releases and social media to ensure awareness and compliance			
	Ensure officers are equipped to share knowledge with businesses, tenants and partners in an ever changing environment			
	Use opportunities during programmed visits to provide safety advice and reassurance to the residents and managers of those properties			
	Increase officers awareness through training and experience in identifying and reporting safeguarding issues for the authority's represented by PPP			
Intelligence	Participation in strategic and operational meetings involving multiple agencies across PPP			
	Utilise existing data report and tasking process to identify incidents of suspected rogue landlords.			
	Participate in the tasking process to identify and develop problem profiles			
Enforcement	Carrying out implementing a range of sanctions available where non-conformity or non-compliance with appropriate conditions or legislation			
	Enhance participation in local operations to increase detection of non-conforming premises and/or individuals.			
	Review FTT and appeals protocols to ensure appropriate support is provided to all concerned in enforcement matters			
SA PRIORITY:		Public Health matters, including Anti-social	CORE PRIORITY:	CC IMPACT:

SA10	behaviour and well being	CP3	CC1
Prevention	Support promotion of successful interventions via wider public access groups such as press releases and social media and on-line reporting to ensure awareness and compliance		
	Supply owners of land supporting materials and advice for those affected by community dispute involving such areas as Japanese knotweed, high hedge, dangerous buildings etc.		
	Update officers knowledge to allow the provision of signposting mediation services in private disputes		
	Ensure resilience in knowledge and duty of care with regard to safeguarding issues.		
	Update officers knowledge to allow the provision of signposting mediation services in private disputes		
Intelligence	Participation in strategic and operational meetings involving multiple agencies across PPP		
	Invest in providing all relevant officers with an ability to carry out searches within land registry database		
	Monitor wider health needs and JSNA's priorities that impact on Residential Team's role in PPP.		
	Retain the capacity and resource to maintain and manage relevant public registers		
Enforcement	Increased resource to tackle by enforcement high hedges, assisted cremation, hoarding, boarding and empty property complaints		
	Implementation of legislation powers in premises that are affect community cohesion		
	Review appeals and works in default (local land charging) protocols to ensure appropriate support and funds are retained with PPP.		

SA PRIORITY:	Health and Safety in the work place	CORE PRIORITY:	CC IMPACT:
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SA11		CP 1, CP2, CP4	CC1
Prevention	Participation in national programmes for preventative inspections in high risk sectors or activities to support businesses to comply with legislation, ensuring that employees and members of the public are being protected and non-compliant businesses are not gaining an economic advantage		
	Use of alternative interventions to target high risk sectors and/or activities identified through national, regional or local problem analysis		
	Promotion of successful prosecutions, interventions and value of interventions via press releases and social media to increase public awareness		
	Attendance at Safety Advisory Groups and inspection at high risk / high profile events		
	The use of the Primary Authority (PA) scheme to provide direction to other LA regulators and to ensure our PA partners are operating legally		
Intelligence	Developing problem spotting protocols across the PPP to enable all officers to report on matters of concern when performing other activities		
	Using the Incident Contact Centre RIDDOR reporting of accidents to target interventions / enforcement;		
	Develop pathways to ensure Reportable Accidents are reported, e.g. exchanging information with the injured person through their contact with Doctors or Physiotherapists.		
	Analysing service requests from the public, employees and employers to develop a better understanding of potential issues to better target resources		
	Using existing links with Berks and Oxon H&S Liaison Groups, the HSE, the RBFRS and Public Health Teams, and developing links with TVP		
	Scanning social media and media for emerging risks		
	The use of National Statistics and National Inspection Plans to assist in targeting resources		
Enforcement	Taking proportionate action on detection of Matters of Evident Concern or Matters of Potential Concern		

	Ensure there is resource to participate in the National Inspection schemes
	Training of officers in accident investigation, evidence gathering, decision making and production of case file and Court proceedings to optimise success rates
	Training in occupational health and safety topics and legislation so we can determine breaches and ensure competency in line with S18 HSWA

SA PRIORITY: SA12	Food Safety at businesses premises and in the home	CORE PRIORITY: CP1, CP2. CP4	CC IMPACT: CC1, CC4
Prevention	Undertake a planned prevention programme of visits / alternative interventions of the risk rated food premises across our area to ensure food placed on the market is safe, members of the public are being protected and non-compliant businesses are not gaining an economic advantage		
	All new food premises are inspected to ensure compliance in business practices, that food placed on the market is safe and to assist with the development of the business; ensuring non-compliant businesses are not gaining an economic advantage		
	Promotion of the Food Hygiene Rating Scheme to enable the public to make informed choices relating to food hygiene of the business premises they use.		
	Through the use of Infectious Disease questionnaires, leaflets on food poisoning and developing the PPP website ensure that individuals with confirmed food related infectious diseases are given educative preventative information		
	Participate in national prevention campaigns led by FSA and PHE and develop PPP website		
	Engagement with the Primary Authority scheme to provide direction to other LA regulators and to ensure our PA partners are operating legally		
telligence	Sampling campaigns and PHE FW&E reports and emerging risks reports by PHE FW&E		

	Continue to horizon scan for emerging risks within the Food Industry; using FSA intelligence (Food Fraud), intelligence reports to FSA, new guidance and legislation and Food Alerts
	Infectious Disease notifications from PHE and emerging risks detected by PHE
	Using existing links with Berks and Oxon Food Liaison Groups, the National Food Focus Group, the FSA, PHE and PHE FW&E and develop links with other organisations to ensure intelligence is fed back into the PPP
	scanning social media and media for emerging risks and from following leads gained during preventative intervention work
	Analysing service requests from the public, employees and employers to develop a better understanding of potential issues to better target resources
Enforcement	Participation in the National and Local sampling programme to identify unsafe food and ensure it is removed from the market and to contribute to national statistics and local intelligence and ensure non-compliant businesses are not gaining economic advantage
	Use the Infectious Disease notifications from PHE to follow up implicated food premises to ensure unsafe food is not placed on the market and take the appropriate action with regard to the cause of the incident
	Ensure that there are appropriate resources to carry out planned prevention work and sampling and the appropriate intervention can be taken where necessary to ensure non-compliant businesses are not gaining economic advantage
	Development of officers in investigation, evidence gathering, decision making and production of case files and Court proceedings to optimise success rates
	Undertake enhanced interventions with the poorest performing food premises (the Zero and One FHRS score premises)
	Ensuring competency of Authorised Officer in line with FSA COP requirements to ensure any enforcement action taken is legal and uncontested and that the action taken by Authorised Officers is correct and does not cause unlawful economic implications to the businesses or put the public at risk

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Public Protection Partnership

Bracknell Forest
West Berkshire
Wokingham

A shared service provided by Bracknell Forest District Council, West Berkshire District Council
and Wokingham Borough Council

COMMUNICATIONS STRATEGY

Making sure we have a clear message

1 April 2018 - 31 March 2020

Contents

1. Setting the Scene	3
2. PPP Vision and Mission.....	3
3. PPP Values	3
4. Strategic Priorities	4
5. Communication Objectives	4
6. Resources.....	7
7. Communications Channels	7
8. Target Audiences	8
9. Key Messages.....	8
10. The Tactical Plan	9
11. Evaluating Outcomes	9
12. Summary.....	9

1. Setting the Scene

The Public Protection Partnership (PPP) delivers Environmental Health, Trading Standards and Licensing Services to around 450,000 people and over 10,000 businesses on behalf of three authorities, Bracknell Forest, West Berkshire and Wokingham Councils. These services encompass a wide range of areas of responsibility from environmental protection to fair trading, food safety to animal health and housing standards to taxi licensing and much more.

Communication is key to the success of the service whether it is getting preventative advice out to the community; encouraging the reporting in priority areas; or working with Partner council's communications channels. This document sets out the PPP approach to developing a communication strategy for such a diverse range of services and illustrates how effective communications can:

- Safeguard and promote the health, wellbeing and safety of our communities.
- Help us achieve our organisational objectives.
- Engage effectively with our stakeholders.
- Demonstrate the success of our work.
- Ensure our publics understand what we do.
- Change perceptions and behaviours where necessary.
- Maintain the integrity, and raise the profile, of the PPP name and brand.

2. PPP Vision and Mission

The PPP's vision is:

To protect and support residents and legitimate business through the successful use of information and intelligence, delivering safe and healthy neighbourhoods.

The purpose of the service is to:

- Provide people information to enable them to make informed decisions and understand their rights and responsibilities.
- Create an atmosphere where legitimate and compliant businesses can thrive and not have their interests undermined by those who choose not to comply.
- Preserve the health, wellbeing and safety of the communities we serve.

3. PPP Values

Our values have a major influence on the way we want to be seen:

- Objectivity in decision making.
- The desire to meet the needs of the community.
- An approach to service delivery which is professional on every level.

4. Strategic Priorities

The strategic priorities will be set out in the 2018-2019 Control Strategy that is due to be published in March 2018.

5. Communication Objectives

The PPP's corporate communication objective, as set out under section 5 of the PPP Business Plan 2017, is:

The effective use of communication to protect communities and enhance the reputation of the Partnership and the Councils.

Cascading from this corporate objective are the following communication objectives:

- Increase community engagement in public protection campaigns, events and activities.
- Encourage the community to report matters and seek advice in key priority areas.
- Increase the profile and reputation of the PPP, its activities and services with key stakeholders, the general public and businesses.
- Guide the PPP on how to maximise customer satisfaction, collating customer information, including satisfaction ratings and feedback, to shape service design.

These objectives should be SMART (specific, measurable, achievable, realistic and timed). To ensure the most comprehensive and effective communications activity, these objectives have been broken down as follows:

- **Increase community engagement in public protection campaigns, events and activities:**

We will ensure people are aware of the services provided by the PPP.

By developing a strong voice in issue awareness with a series of integrated multi-channel communications campaigns around identified key issues to specified target audiences. By developing an engaging and interactive 'go-to' website with pages relevant to local services; by ensuring excellent Search Engine Optimisation (SEO); and by signposting people to relevant website pages. By holding local and regional PPP events and by attending stakeholder events.

We will ensure people know who to contact to receive professional consultancy across our range of functions.

By delivering targeted and integrated media, social media and digital media marketing campaigns to promote the collective and individual expertise within the PPP.

We will ensure design and advertising is timely, attractive, inclusive and clear.

By compiling a publication and advertising schedule and by prioritising the delivery of the schedule. Design will adhere to our brand guidelines, will meet our regulatory requirement not to discriminate on the grounds of race, religion, gender, marital status, sexual orientation, disability or age; and will be written in Plain English. Copy will be in large print, Braille or translated where necessary.

We will ensure website marketing content is accurate and up to date.

By putting together a website strategy/protocol that sets out how the website content across the authorities will be checked and kept up to date using each Partner council's policies and procedures; by keeping aware of public protection best practice; and by being up to date with legal requirements.

We will ensure social networking media is used effectively to market the services provided by the PPP.

By developing a social media strategy/protocol to maximise the accessibility and impact of our services in the evolving digital environment.

We will ensure systems are in place to support marketing.

By delivering a comprehensive PPP communications function by innovation and by using the latest technology to ensure communications is embedded across the service. Systems to include a CRM tool, digital and social media, media distribution and monitoring systems, feedback mechanisms and e-marketing tools.

▪ **Encourage the community to report matters and seek advice in key priority areas:**

We will ensure the community is aware of our key messages and through this to encourage reporting to enhance the PPP's ability to assess the areas of greatest concern facing the community and deal with them appropriately.

By developing a strong voice in issue awareness and through this encouraging reporting to allow the PPP to be able to assess the extent of problems facing the community and deal with them appropriately. By planning a series of integrated multi-channel communications campaigns around identified key issues affecting specified target audiences to encourage reporting and feedback. Through PPP events and stakeholder events. By providing information on the website to help people help themselves, as a first port of call.

We will work with stakeholders, decision makers, business, clubs, groups and organisations to continue to develop effective partnerships and to increase their participation in getting across key messages and supporting the community to make informed choices.

By initiating and maintaining excellent relationships with stakeholders, decision makers, businesses, clubs, groups and organisations to develop effective partnerships and to increase their participation in getting across key messages and supporting the community to make informed choices. By giving advice and guidance on their communication activities. Key to our success is officer engagement with customers and partner agencies to win 'hearts and minds' and support for what we do.

▪ **Increase the profile and reputation of the PPP, its activities and services with key stakeholders, the general public and businesses:**

We will ensure the Public Protection Partnership has a strong, recognisable identity and brand.
<i>By working with Partner council's communications teams we will develop a style guide to apply to all PPP external and internal facing material including the website and digital promotional material, printed literature, MS PowerPoint presentations, print outs and Word documents, to ensure a strong, recognisable identity and brand is used across the service and its associated projects.</i>
We will ensure there is regular liaison with the Partner council's communications teams in making full use of the corporate communication services they provide.
<i>By meeting with each Partner council's Communications Lead Officer to understand fully the corporate communication services they provide and by drawing up a PPP communications protocol around agreed use of these services.</i>
We will ensure communication with elected members, staff and senior managers is clear and timely.
<i>By agreeing communication service standards with elected members, staff and senior managers and delivering to these agreed standards. Methods to include members bulletins, Newsflash e-newsletter for staff and staff briefings.</i>
We will develop positive relationships with the print and broadcast media.
As set out in the PPP Business Plan 2017 section 15.5 'Each Partner will provide the Service with access to resources to process media enquiries relevant to the Service. This will include: <ul style="list-style-type: none"> ▪ Logging all media enquiries relevant to their area. ▪ Liaising with relevant elected members. ▪ Provision of advice to the service when requested. ▪ Assistance in promotional campaigns. The Client Officer will advise the Service of any local procedures and facilitate where appropriate.'
<i>By working with internal and external Partner media teams to develop a strong voice in the media to raise the profile of issue awareness. This will be achieved by compiling a proactive, targeted press plan that identifies objectives, 'gaps' and 'opportunities' for increased media coverage. By promoting success stories. Training needs will be assessed and a media programme developed for colleagues/members. Where appropriate, colleagues/members will be given opportunities to write for the media.</i>
We will develop our social media presence and manage online content.
<i>By developing a digital protocol/strategy, including a social media strategy/protocol.</i>

- **Guide the PPP on how to maximise customer satisfaction (given the resources available to achieve our goals), collating customer information, including satisfaction ratings and feedback, to shape service design:**

The Lead Officer – Community Engagement will work with the Team Manager (Energy and Business Support) to ensure that systems are in place to collect and report information about customers and organisations.

By overseeing the construction and management of a Customer Relationship Management (CRM) marketing tool. By understanding what information is needed and how it should be

reported. Ways to collect information include surveys (eg using SurveyMonkey), PPP events and stakeholder events.

The Lead Officer – Community Engagement will work with the Team Manager (Energy and Business Support) to ensure that systems are in place to collect and report customer feedback and satisfaction.

By shaping service design through consulting the public and members about their priorities - ways to collect feedback include surveys, PPP events and stakeholder events. Feedback results of consultation to customers, internal and external. By setting up mechanisms to collect customer feedback and by setting up a system to both analyse the data and to report on customer satisfaction, such as SurveyMonkey.

To complete the strategy the following generic communications objectives have been compiled:

We will develop a crisis communications plan to take effect in the event of a crisis.

By developing a thoughtfully prepared crisis plan to ensure we are able to respond promptly, accurately and confidently in the event of an emergency. The PPP plan to dovetail with wider Partner council's emergency plans.

We will develop a consistent approach to internal communications to enable colleagues and members to understand the PPP's vision and direction especially during periods of change.

By consulting with colleagues and members on how they prefer to be informed, and by developing an internal communications strategy and protocol.

6. Resources

To deliver the strategy effectively and efficiently we need to evaluate what budget, assets and staff we have access to. Throughout the delivery of this strategy we will at all times be diligent in the use of resources, careful to demonstrate value for money and be mindful of good return on investment. The Lead Officer – Community Engagement will work across the PPP service with Partner council's communication teams and alongside a team of 'communications champions' drawn from each PPP service area.

7. Communications Channels

The communications strategy will ensure the PPP utilises the appropriate communications channels to effectively deliver the PPP's comprehensive communications function. The channel used will be based on assessment of the target audience and the key messages. The following table shows the communications channels we have access to and the tactics we are currently employing, together with potential tactics:

Channel	Tactics
Advertising	Press, radio, TV, magazines, poster sites (buses, billboards, bus stops), cinema, Google, Facebook, directories

Channel	Tactics
Digital communication	Website, social media (Facebook, Twitter, YouTube, LinkedIn), online newsletters, blogs, e-marketing, mobile texts, apps, PPP Newsflash e-newsletter
Direct marketing	Campaign letters/leaflets with key messages for targeted audiences
Events	Seminars/conferences/events. Issue awareness events/feedback events
Internal communication	Internal meetings, briefings, notice boards, members meetings, e-mail, members/staff newsletters
Public relations	Getting media and on-line exposure via local and regional TV and radio appearances, stories/photos printed in local and regional media
Promotional literature	Consumer/regulated business newsletters, magazines, leaflets
Other eg merchandising, sponsorship, partnerships	Promotional materials, local competitions, town and parish councils, members, PPP staff and all staff to varying degrees

Whatever the channel, it is important to remember it can take time to build the target audiences, relationships and issue awareness.

8. Target Audiences

This strategy sets out the key audiences we will be targeting as follows:

- The public
- Staff
- Public sector organisations
- PPP Boards and Committees
- PPP Partner authorities
- Partner agencies
- Local business
- Elected members
- Community groups
- Charitable groups

9. Key Messages

Communication can be very powerful and we want people to pay attention to what we are saying and most importantly **to take action**. Key messages will be developed for each target audience depending on the specific campaign. The following short, simple messages are examples of our 'call to action' to some of our target audiences:

- What can you do to help keep your neighbourhood safe?
- What can you do to help keep your neighbourhood healthy?
- Why get involved? To keep your neighbourhood safe and healthy
- Why get involved? To help protect and support your neighbours
- Your help is crucial, engage with us in public protection
- Ways in which you can get involved...
- How can I get involved?
- Help us shape and improve our services
- We need your help

Further compelling key messages will be developed depending on the individual campaigns we are running. Our communications should be simple and easy to understand.

10. The Tactical Plan

By bringing together our objectives, target audiences, key messages and communications channels, we have the basis of a strong and compelling communications tactical plan. The PPP Communications Action Plan 2018-2020 will set out the detail of how the PPP Communication Strategy will be delivered over the next two years.

11. Evaluating Outcomes

We will need to demonstrate to our Partners, members and other stakeholders, how the communication activity, as set out in this strategy, is making a difference and is value for money. We aim to do this with robust targets, making sure we are continually striving to be better in all we do. To ensure our strategy is successful we will measure the effectiveness of what we are doing by compiling a monthly Communications Dashboard and by reviewing the Action Plan on a regular basis. The targets will be evidenced in our Action Plan and our performance against these targets will be monitored by the Joint Management Board.

12. Summary

It is an important time for the PPP as it develops a clearer identity and starts implementing the business plan to greater effect. We look forward to delivering this strategy with our Partner council's communications teams, colleagues, members and other associates. Not only are we passionate about delivering a great communications service, we are confident through our communications activity, consultation, team work and best practice, the PPP will be in a stronger position to implement its vision:

To protect and support residents and legitimate business through the successful use of information and intelligence, delivering safe and healthy neighbourhoods.

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