

# Public Document Pack



**Service Director – Legal, Governance and  
Commissioning**

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Wednesday 2 October 2019

## Notice of Meeting

Dear Member

### **Economy and Neighbourhoods Scrutiny Panel**

The **Economy and Neighbourhoods Scrutiny Panel** will meet in the **Council Chamber - Town Hall, Huddersfield** at **2.00 pm** on **Thursday 10 October 2019**.

This meeting will be webcast live and will be available to view via the Council's website.

The items which will be discussed are described in the agenda and there are reports attached which give more details.

A handwritten signature in black ink, appearing to read 'Julie Muscroft', on a light-colored background.

**Julie Muscroft**

**Service Director – Legal, Governance and Commissioning**

Kirklees Council advocates openness and transparency as part of its democratic processes. Anyone wishing to record (film or audio) the public parts of the meeting should inform the Chair/Clerk of their intentions prior to the meeting.

## **The Economy and Neighbourhoods Scrutiny Panel members are:-**

### **Member**

Councillor Harpreet Uppal (Chair)

Councillor Martyn Bolt

Councillor Richard Murgatroyd

Councillor John Taylor

Councillor Richard Eastwood

Councillor Yusra Hussain

Andrew Bird (Co-Optee)

Chris Friend (Co-Optee)

Eilidh Ogden (Co-Optee)

# Agenda

## Reports or Explanatory Notes Attached

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### Pages

**1: Minutes of the Previous Meeting**

1 - 6

To approve the minutes of the meeting of the Panel held on 19 September 2019.

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**2: Admission of the Public**

Most debates take place in public. This only changes when there is a need to consider certain issues, for instance, commercially sensitive information or details concerning an individual. You will be told at this point whether there are any items on the Agenda which are to be discussed in private.

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**3: Deputations/Petitions**

The Panel will receive any petitions and hear any deputations from members of the public. A deputation is where up to five people can attend the meeting and make a presentation on some particular issue of concern. A member of the public can also hand in a petition at the meeting but that petition should relate to something on which the body has powers and responsibilities.

In accordance with Council Procedure Rule 10 (2), Members of the Public should provide at least 24 hours' notice of presenting a deputation.

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**4: Public Question Time**

The Panel will hear any questions from the general public.

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**5: Air Quality Action Plan**

7 - 146

The report will provide an update in relation to the development of the Council's five year Air Quality Action Plan.

Contact Officer: Martin Wood, Operational Manager, Public Protection Service. Tel: 01484 221000

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**6: Trees and Woodland Policy** 147 - 180

A report will be presented in relation to a new Council Owned Tree and Woodland Management Policy for the implementation of the procedures outlined in the Tree Works Guidance Document and the Tree Risk Management Framework. The report also gives an update on the approach to the White Rose Forest development.

Contact Officer: Rob Dalby, Greenspace Operational Manager. Tel: 01484 221000

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**7: Preventing Homelessness and Rough Sleeping Strategy 2018-23 - Update** 181 - 198

The report will provide an update on the approach being taken with key partners to develop and implement action plans which support the achievement of the outcomes set out in the Strategy.

Contact Officer: Helen Geldart, Head of Housing Services. Tel: 01484 221000

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**8: Work Programme 2019/20** 199 - 204

The Panel will review its Work Programme for 2019/20.

Contact Officer: Sheila Dykes, Principal Governance and Democratic Engagement Officer. Tel: 01484 221000

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Contact Officer: Sheila Dykes

## KIRKLEES COUNCIL

### ECONOMY AND NEIGHBOURHOODS SCRUTINY PANEL

**Thursday 19th September 2019**

Present: Councillor Harpreet Uppal (Chair)  
Councillor Martyn Bolt  
Councillor Richard Murgatroyd  
Councillor Richard Eastwood  
Councillor Yusra Hussain

Co-optees Andrew Bird  
Chris Friend

In attendance: Rob Dalby – Greenspace Operational Manager  
Lory Hunter - Commercial and Technical  
Development Manager  
Karl Battersby - Strategic Director Economy and  
Infrastructure

Apologies: Councillor John Taylor  
Eilidh Ogden (Co-Optee)

**1 Membership of the Committee**

Apologies were received from Councillor John Taylor and Eilidh Ogden.

**2 Minutes of the Previous Meeting**

That the minutes of the meeting held on 17 July 2019 be agreed as a correct record.

**3 Interests**

No interests were declared.

**4 Admission of the Public**

All items were considered in public session.

**5 Deputations/Petitions**

No deputations or petitions were received.

**6 Public Question Time**

No public questions were received.

**7 Waste Related Issues**

Rob Dalby, Greenspace Operational Manager and Lory Hunter, Commercial and Technical Development Manager gave a presentation to the Panel in respect of the following:

## Economy and Neighbourhoods Scrutiny Panel - 19 September 2019

- Ward Squads
- Fly Tipping
- Household Waste Recycling Centres
- Bulky Waste Collection

Rob explained that the Ward Squads had been established to enable the service to work in a constructive manner with Ward Councillors on environmental issues. The aim was for each ward to have two weeks of scheduled work per year; one in the summer and one in the winter. It was considered that a number of benefits had been realised including; improved joined-up working, upskilling of team members, increased co-operation with third parties, improved communication with ward councillors, and a number of longer term environmental issues being addressed. He noted that, in light of the current capacity of the team, the two weeks of work per ward may not be sustainable in the longer term.

In response to suggestions from Members of the Panel he agreed that it would be a good idea to provide ward members with intelligence/data on the issues raised by their constituents. He also said that he would welcome suggestions in respect of how the service might be able to support them in publicising/promoting the work being undertaken.

In response to questions Rob explained that:

- There were 7 Enforcement Officers and 11 Rangers in the Greenspace Action Team (GAT); each delivery team consisting of 4 team members plus a supervisor.
- The works were pre-scheduled to be delivered during a particular week.
- Volunteer groups could achieve a great deal and tended to be issue or site focussed. Volunteers could be supported and provided with training to assist them in working independently of the GAT.
- In terms of evaluation, a feedback questionnaire had been sent out to Ward Councillors and a review of the work undertaken during the summer period would be undertaken including an assessment of the skills and capacity of the team.

Rob explained the legal definition of fly tipping and the ways in which the Council could deal with this issue. He gave examples of recent prosecutions and it explained that if an individual gave waste to a third party to dispose of and this party was not registered this was also an offence. In respect of responsibility for clearance; if the waste was on Council owned land it would be cleared; the Council would serve notice on a private landowner to clear their site of waste and if this was not done this could also result in an offence; and if no landowner could be identified the decision about whether the Council should clear it was public interest/risk based.

He noted that consideration was being given to re-modelling street based enforcement activity.

In response to questions Rob and Lory explained that:

- The heat maps did not inform practice; they illustrated the correlation between population density and deposition of waste.

## Economy and Neighbourhoods Scrutiny Panel - 19 September 2019

- There were a number of locations that were known to subject to regular fly tipping such as rural laybys and cross border tipping was an issue.
- Incidents could be reported online, by phone, via Kirklees Direct or the Police 101 phone line. The court system meant that witnesses could not remain anonymous and people could be reluctant to go to court but cases could be resolved before that point when an individual was presented with the evidence under formal interview and admitted the offence.
- It was not considered that changes to service provision had had a significant influence on the levels of fly tipping.
- Signs had been provided in the past and could be considered if there were particular locations that were of concern.

It was suggested that completion of an on-line form may allow the collation of evidence/intelligence on particular incidents or vehicles.

Rob undertook to provide information on the level of fines collected in relation to the number issued and to send Members the flow chart of enforcement action. If a case went to court the Council did not collect the fine but could apply for costs including recompense for the time spent investigating the offence and for legal work.

He said that the service did undertake proactive information sharing in areas where there may be a recurrent problem including explaining the offence, the consequences, how people could dispose of their waste legitimately and advice about caution in the use of third parties such as requesting to see their waste carrier licence and taking number plate details.

Lory highlighted the following points in respect of the Household Waste Recycling Centres (HWRC):

- HWRCs were located across the district, they were small and designed for household waste; there were other options for the disposal of trade waste.
- A permit system for Kirklees residents had been in place since July 2016 to facilitate better management of the sites and remove large commercial type vehicles. It was considered that the application process was quick and straightforward through the My Kirklees Account. Support was available for individuals who weren't able to apply online.
- The website provided information about what could be recycled. Soil and rubble were no longer collected at HWRCs and were dealt with through the kerbside bulky waste collection service.
- A national resources and waste strategy had been published by the Government and the Council would be developing a new recycling and waste strategy.

In response to questions Lory explained that:

- The value of any recycled materials was retained by the contractor SUEZ. Figures could be provided to show the split between recyclable and general waste.
- The Council was running workshops 'love food save more' to encourage food waste minimisation and could explore the development of social enterprise recycling/re-use initiatives or re-use shops.

## Economy and Neighbourhoods Scrutiny Panel - 19 September 2019

- A strategic environmental assessment including the whole system would need to be considered as part of the district's new waste strategy.
- Capacity at the HWRCs would be looked at as part of the wider strategy.
- The current contract ended in 2023 with an option to extend by 5 years.

In relation to the bulky waste service Lory explained that changes had been implemented in 2016 and this service was now subject to charges. All the West Yorkshire local authorities charged for this service and the rates were comparable with Kirklees. There was an online booking system but support was available if this was an issue. The most vulnerable residents were offered two free collections a year and there was a discount for Kirklees Passport holders.

A member of the Panel raised an issue where a constituent had experienced a lengthy delay in collection of a bulky waste order. It was noted that this provision would be reviewed as part of the development of the new strategy but that capacity may be an issue that the Panel might want to consider in more detail in due course.

Rob and Lory were thanked for attending the meeting and for the presentations on the various issues.

### **RESOLVED -**

- (1) That the value of the work being undertaken by the Ward Based Squads, and the opportunities being taken to further expand the skills of the members of the team, be acknowledged and welcomed.
- (2) That it be recommended that:
  - Ward Councillors should be provided with an overview of the issues reported to the Council by residents (including on ROSS) to assist them in determining the priorities for action within their ward.
  - Consideration be given to how best the Service might be able to support ward members in promoting and publicising this work to their residents.
  - The Service should consider raising awareness within schools and colleges of the potential for volunteering opportunities and work experience.
- (3) That Members of the Panel be provided with:
  - data in relation to the number of fines collected for littering and fly tipping compared with the number issued.
  - the enforcement flow chart.
  - the gross tonnage figures for the Household Waste Recycling Centres broken down into general waste/recyclable waste for 2015/16 onwards.
- (4) That it be recommended that:
  - A strategic environmental assessment should be undertaken as part of the development of the Kirklees Waste Strategy.
  - Disposal of trade waste, including the potential impact on the levels of fly tipping, should be considered as part of the development of the new waste strategy.

- (6) That fly tipping be retained on the Panel's Work Programme with a particular focus on the use of an intelligence led approach.
- (7) That it be noted that:
- information is provided on the bulky waste website to encourage recycling/re-use.
  - the potential for re-use shops, with links to the Household Waste Recycling Centres, is being studied.
  - It is anticipated that the operation of the bulky waste collection service will be reviewed as part of the overall waste strategy for the district and that the potential for limited free collection(s) could be considered as part of the review.
- (8) That the Panel considers that it would be beneficial to increase awareness of:
- The concessions available for the bulky waste collection service for those residents in receipt of an assisted bin service.
  - The permit process for the Household Waste Recycling Centres.

**8 Work Programme 2019/20**

That the Panel's Work Programme and forthcoming items/activities be noted.

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**Name of meeting:** Economy and Neighbourhoods Scrutiny Panel  
**Date:** 10 October 2019  
**Title of report:** Kirklees Council Five Year Air Quality Action Plan 2019

**Purpose of report**

1. Up brief and update the Economies and Neighbourhood Panel on the development of Kirklees Council's Five Year Air Quality Action Plan.

**Updates to this report following the briefing report on the same topic in May**

<b>Key Decision - Is it likely to result in spending or saving £250k or more, or to have a significant effect on two or more electoral wards?</b>	<b>Yes</b>  This report affects all wards
<b>Key Decision - Is it in the <a href="#">Council's Forward Plan (key decisions and private reports?)</a></b>	<b>yes</b>  <b>If yes also give date it was registered: 8 August 2019</b>
<b>The Decision - Is it eligible for call in by Scrutiny?</b>	<b>Yes</b>  <b>If no give the reason why not</b>
<b>Date signed off by <a href="#">Strategic Director</a> &amp; name</b>  <b>Is it also signed off by the Service Director (Finance)?</b>  <b>Is it also signed off by the Service Director for Legal Governance and Commissioning?</b>	Karl Battersby 1/10/19
<b>Cabinet member <a href="#">portfolio</a></b>	<b>Cllr Naheed Mather</b>

**Electoral wards affected: all wards**

**Ward councillors consulted:** Councillors in Wards which contain Air Quality Management Areas have been consulted by invites to meetings. Further written consultation to be conducted. **Ward Cllr meetings are detailed within the Action Plan.**

**Public or private:** Public

**(Have you considered GDPR?)** No personal information contained in the report.

## 1. Summary

### Overview

Air Quality (AQ) is a term given to problems associated with pollution emissions to the atmosphere which have a harmful effect on human health and wellbeing. In general terms the pollutants of concern are Nitrogen Dioxides (NO<sub>2</sub> or NO<sub>x</sub>) and fine Particulates (PM<sub>10</sub>, PM<sub>2.5</sub>), amongst others such as Sulphur Dioxide, Ammonia, Ozone, Carbon Monoxide and Volatile Organic Compounds (not methane).

Air quality in this context does not refer to the emissions of 'Greenhouse Gases' such as Carbon Dioxide or Methane, amongst others. Greenhouse gases cause climate change over the longer term and are a chronic problem. Unlike greenhouse gases, pollutants which lead to poor air quality cause harm to people's health in a relatively shorter timescale and is therefore an acute problem.

The sources of these emissions are from human activity and the main causes are road transport, industrial emissions, energy production, agriculture, non-road transport and domestic heating.

The health effects caused by poor air quality are asthma, respiratory illnesses, heart disease and shorter life expectancy. People who are elderly, have long term conditions, children and pregnant women are most at risk.

Actions to reduce pollution emissions and improve air quality need to be taken by national governments however, some actions need to be at a local level as local authorities and their partners can influence some of the sources of pollution (local road transportation, some industrial emissions, domestic solid fuel burning. It is the local authority's responsibility to measure the levels of air pollution under the Environment Act 1995. The World Health Organisation set limits for pollutant levels, which are used by national governments in legislation.

Kirklees Council monitors air quality at around 80 sites across the district. Over the past 10 years officers have identified 10 individual sites where pollution levels have been breached. As a result, the local authority is duty bound to declare these areas as Air Quality Management Areas (AQMAs), which then requires the authority to produce an Action Plan setting out the measures the authority will take to reduce emissions and improve air quality in those areas and more generally in the district. The action plan is a statutory document required by law and is submitted to the Government for review and acceptance.

Kirklees Council declared 7 new Air Quality Management Areas in 2017 and 1 new AQMA in 2019 Officers have produced a new Five Year Action Plan (Appendix 1) for Kirklees which, subject to approval, will be submitted to Government in November 2019. Kirklees had 2 Action Plans associated with the 2 AQMAs declared in 2008 and 2009 – these will be revoked and replaced by the new action plan.

Local Authorities are also required by law to submit an annual report to Government setting out the previous year's monitoring activity, report on progress of any Action Plan which is in place and its intention to declare or remove any Air Quality Management Areas. This is the Annual Status Report (ASR) and is a statutory document.

Given the local and national interest in Air Quality and the immediate problems facing human health and wellbeing - Kirklees Council Members requested at Full Council that the authority had an Air Quality Strategy. It is not a legal requirement to have a Strategy. The Air Quality Strategy will sit alongside the Action Plan setting out in general terms the problems faced by Kirklees and it's residents and business, the actions the authority has already taken on **Page 8**



improving and monitoring air quality, actions it is currently taking, future plans as well as what the public can do to improve air quality.

The detailed improvement measures are in the Action Plan and detailed information on monitoring will be reported in the Annual Status Reports.

The production of the Strategy and Action Plan has been a collaborative process led by Environmental Health and Public Health Officers involving almost all departments of the authority and Council partners. The full details of the collaborative approach is detailed within the action plan. It approach is necessary as measures to improve air quality are not solely the responsibility of Public and Environmental Health, but transportation, highways, planning, procurement and Climate Change/Carbon Reduction departments. Ward Cllrs who's areas contained AQMAs were engaged with by direct meetings to gain their views on air quality and mitigation in their areas.

In June and July 2019 Kirklees Council held a public consultation on the Action Plan, writing to Local Councillors and statutory consultees.

At the same time as the consultation the Air Quality Strategy which was agreed by Portfolio Holder and Executive Team in December 2018 to postpone publication to bring in line with the publication of the Action Plan was updated to reflect some minor changes in the situation since December 2018, for example the declaration of a Climate Emergency.

### Outcome of the Consultation

Kirklees Council received a total of 18 responses to the Air Quality Action Plan Consultation, which ran between 6 June 2019 and 20 July 2019 (6 weeks).

These responses can be broken down into type;

- 2 Councillor responses
- 1 Town Council response
- 1 NHS Trust
- 2 Local Businesses
- 1 Civic Society
- 7 Local residents
- 4 Anonymous

Some responses were received not via the required consultation channels or out of time – these responses are not noted above, however, the view contained have been taken into account.

Analysis of the responses indicate a number of running themes within them, of which the 3 main common responses have been highlighted below;

1. The need for increased monitoring outside of the current AQMA's is a common concern raised, both towards NO<sub>2</sub> and Particulates. The existing monitoring program is included within the plan and continued assessment of the network. Notwithstanding this, there is clear demand for the network to be rationalised and expanded to alleviate local residents concerns
2. There is a demand for a greater communications between the council and the public, making the issue more accessible and easier to understand. The plan did include a communications plan within it, but further work could undertake to increase accessibility and community/partnership working to deliver shared outcomes.
3. Third most common discussion point centred on the need for clear measurable outcomes to measure the delivery of the action plan against. The action plan includes some measurability, but EH will analyse the viability of including further measurability to the plan.

## **It is proposed to publish the outcome of the consultation and the next steps on the Council's Air Quality Webpage.**

### Action since the Consultation

Following conclusion of the consultation, in collaboration with Portfolio Holders during their briefings (Clean and Green, Transportation and Public Health) the Action Plan has been updated. The main change being the addition of a set of measurable targets for each action within the plan. These targets have been taken from either pre-existing targets for actions/projects or a new measurable has been included. Where an action is in an early stage of project planning – a suitable generic target has been included – it is accepted – as projects are developed more suitable measurable targets can be added at a later revisions of the Action Plan.

It was not considered necessary to add any further actions in relation to points one and two above – as these were already actions within the plan.

## **2. Information required to take a decision**

None – this is an update to the E&N Scrutiny Panel.

## **3. Implications for the Council**

### **3.1 Working with People**

In order to be successful in reducing pollution emissions we need to work with members of the public and business as poor air quality is caused by human activity, such as light private vehicles as well as commercial light and heavy goods vehicles driving on the road, industrial emissions or how we choose to heat our homes. There is very limited legislative tools available to the local authority – so the Council will have to influence and change behaviour of the public at large using soft measures and leading by example.

The Action Plan has working with people at its core. The delivery of the Strategy and Action Plan will involve a number of measures within the working with people strand of the Council's overall Corporate Plan. Some of this will be informing and bringing people along with us, however, some will require enforcement activity where people are not doing as they are required – such as pollution incidents and where the law is broken.

### **3.2 Working with Partners**

Working with partners is essential in improving air quality as actions the Council can take will not improve air pollution sufficiently to have a positive impact on health outcomes.

In developing the Strategy and Action Plan officers have engaged with a number of partners, both within and outside of the Council. Meetings and engagement sessions have been conducted to examine and explore what internal and external partners can do to improve air quality.

Internal Partners:

- Public Health
- Planning
- Strategic Transportation
- Investment and Regeneration (Carbon Reduction)
- Highways

- Fleet Management
- People Services
- Communications
- Procurement
- Property Services
- Ward Members in affected Wards

The main external partners:

- West Yorkshire Combined Authority
- Highways England
- NHS and Health Partners
- Huddersfield University
- Our neighbouring local authorities

**We have engaged directly with Local Business Organisations as part of the formal consultation process of the action plan.**

### **3.3 Place Based Working**

Having a Place Based Working approach is necessary for delivery of the Action Plan and Strategy as measures that are appropriate in one location will not be appropriate in another. Officers have examined each area and assessed what is the most appropriate action(s) in that area – we are not just taking broad bush district wide measures.

The Action Plan is broken down into the individual areas in which AQMAs exist as well as district wide measures. The section which looks at the individual AQMA takes into account the local environment and what is appropriate for that area.

### **3.4 Improving outcomes for children**

As Children are one of the affected groups of poor air quality – any improvements in Air Quality will improve the Outcomes for Children.

### **3.5 Other (eg Legal/Financial or Human Resources)**

There are legal implications for the Council if it does not agree and submit the Action Plan to Government on time. There is no legal requirement for a Strategy. As the UK as a whole is not complying with European Directives on Ambient Air – there is a possibility that the EU may fine the UK for non-compliance. UK national Government have advised in the past that it would pass on these fines to Local Authorities who are not complying with their obligations.

Internal Human Recourses measures are included in the Action Plan – as activity of the Council's Officers going about the Council's business causes pollution emissions. However, these measures are not anticipated to cause Human Resources issues and collaboration with People Services is part of the Action Plan preparation.

Financial Implications for the Council – measures to tackle AQ cost money to implement – whether this is capital investment in changes in infrastructure such as new road lay outs or improved traffic signals, investment in monitoring and measurement equipment. Soft measures to influence behaviour change is resource intensive – such as officer time/materials etc. The Action Plan has been written in a way which obligates the Council to spend resources on actions which already have budget commitments. However, these committed measures will not go far enough to tackle the problem. The Action Plan may also contains financially uncommitted measures which the Council will take if the resources available – such as through a new budget commitment or external funding such as a grant

award. Once the Action Plan is accepted – detailed proposals will be brought forward for consideration within the Councils' normal decision making and governance procedures.

#### **4. Consultees and their opinions**

Ward Councillors have had the opportunity to engage in the process and a number of meetings on a ward by ward basis have already occurred. The outcome of the Ward level discussions have fed into the actions within the Action Plan where relevant and possible.

There has been a formal consultation of both the Action Plan as required by the Environment Act 1995. This report seeks engagement as to the extent of the Action Plan update as a result of the consultation.

#### **5. Next steps and timelines**

Cabinet approval is required for approval of the Action Plan (and the Strategy), post consultation and revision, to submit to National Government for formal approval. Delegated decision for Portfolio Holder and Strategic Director to sign off the Action Plan following positive review from National Government to be sought. The Action Plan and Strategy is on Cabinet forward plan for November 2019 to align with Climate Emergency.

Following the review and acceptance from National Government review – the Air Quality Action Plan signed off by Portfolio Holder and Strategic Director. No timeline can be given for return from DEFRA.

If National Government does not recommend the Action Plan can be adopted – it will issue recommendations of what improvement should be made. Officers will take account of these recommendations and make revisions to the Action Plan. This will then be submitted for authorisation for re-submission to Government.

#### **6. Officer recommendations and reasons**

Members' comments are invited

#### **7. Cabinet portfolio holder's recommendations**

Portfolio holder has been briefed prior to E&N Panel.

#### **8. Contact officer**

MARTIN WOOD  
Operational Manager  
Public Protection Service

#### **9. Background Papers and History of Decisions**

Draft Air Quality Action Plan 2019

#### **10. Service Director responsible**

Service Director (Environment) – Sue Procter



Air Quality Action Plan for  
**Kirklees Council**

Version 1.4

In fulfillment of Part IV of the  
Environment Act 1995

Local Air Quality Management

September 2019

<b>Local Authority Officer</b>	Andrew Jameson
<b>Department</b>	Investment and Regeneration Services
<b>Address</b>	Environmental Health Flint Street Depot Flint Street Fartown Huddersfield HD1 6LG
<b>Telephone</b>	01484 221000
<b>e-mail</b>	<a href="mailto:andrew.jameson@kirklees.gov.uk">andrew.jameson@kirklees.gov.uk</a>
<b>Report Reference number</b>	Kirklees_2018_AQAP1.4
<b>Date</b>	September 2019

## Kirklees Council District Action Plan

<b>Copy</b>	<b>Date</b>	<b>Reason for Changes</b>	<b>Officer</b>
1.1	20/02/19	Initial Draft	A Jameson
1.2	01/04/19	Inclusion to reflect feedback from approval process	A Jameson
1.3	12/08/19	Inclusion to reflect feedback from public consultation	A Jameson
1.4	23/09/19	Inclusion to reflect feedback from approval process	A Jameson

DRAFT

### Executive Summary

This Air Quality Action Plan (AQAP) has been produced as part of our duty to Local Air Quality Management (LAQM). It outlines the action we will take to improve air quality in Kirklees Council between April 2019 and March 2024.

This action plan replaces the previous action plan which ran from May 2007 to August 2019. Highlights of successful projects delivered through the past action plan include:

- Redevelopment of congested junctions
- Installation of Split Cycle Offset Optimisation Technique (SCOOT) traffic managements system across the district
- Installation of bus lanes and bus priority at traffic lights
- School Bike-ability Scheme
- Calder Valley Cycle Scheme
- Free parking for ULEV Vehicles
- City Car Club
- Deep clean of AQMA 2
- EV charge point installations across district

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.<sup>1,2</sup>

The annual health cost to society of the impacts of particulate matter alone in the UK is estimated to be roughly £16 billion<sup>3</sup>. Kirklees Council is committed to reducing the exposure of people in the Kirklees district to poor air quality in order to improve health.

We have developed actions that can be considered under 11 broad topics:

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<sup>1</sup> Environmental equity, air quality, socioeconomic status and respiratory health, 2010

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

<sup>3</sup> Defra. Valuing the overall impacts of air pollution, March 2010



- Alternatives to private vehicle use
- Environmental permits
- Freight and delivery management
- Policy guidance and development control
- Promoting low emission plants;
- Promoting low emission transport
- Promoting travel alternatives
- Public information
- Transport planning and infrastructure
- Traffic management
- Vehicle fleet efficiency

Our primary priority within Kirklees relates to emissions associated with vehicles, the local topography and congestion. In conjunction with the primary focus, Kirklees will also work with local businesses, home owners and developers to reduce the impact from their emissions.

We have worked hard to engage with stakeholders and communities which can make a difference to air quality in Kirklees. We would like to thank all those who have worked with us in the past and we look forward to working with you again as well with new partners as we deliver this new action plan over the coming years.

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 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 Kirklees Council's direct influence.

### **Responsibilities and Commitment**

This AQAP was prepared by the Environmental Health Department of Kirklees Council with the support and agreement of the following officers and departments:

- Kirklees Council Public Health
- Kirklees Council Highways Department
- Kirklees Council Planning Department
- Kirklees Council Procurement

## Kirklees Council District Action Plan

- Kirklees Council Communities and Leisure
- Kirklees Neighbourhood Housing
- Huddersfield University
- Highways England
- West Yorkshire Low Emissions Strategy Steering Group
- West Yorkshire Combined Authority

This AQAP has been approved by:

<Details of high level Council members who have approved the AQAP (NB: In two tier authorities this could include sign off from County Councils) e.g. Head of Transport Planning, Head of Public Health, with e-signatures>.

This AQAP will be subject to an annual review, appraisal of progress and reporting to the relevant Council Committee (specify if relevant). Progress each year will be reported in the Annual Status Reports (ASRs) produced Kirklees Council, as part of our statutory Local Air Quality Management duties.

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

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### Abbreviations

AQAP	Air Quality Action Plan
AQMA	Air Quality Management Area
AQS	Air Quality Strategy
ASR	Annual Status Report
LAQM	Local Air Quality Management
NO <sub>2</sub>	Nitrogen dioxide
NO <sub>x</sub>	Nitrogen oxides
AQO	Air Quality Objective
PM	Particulate Matter
PM <sub>10</sub>	Particulate matter less than 10 micron in diameter
PM <sub>2.5</sub>	Particulate matter less than 2.5 micron in diameter
SCOOT	Split Cycle Offset Optimisation Technique
WYLES	West Yorkshire Low Emissions Strategy

## 1 Introduction

This report outlines the actions that Kirklees Council will deliver between October 2019 and October 2024 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 local authority'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 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 Kirklees Council's air quality ASR.

## 2 Summary of Current Air Quality in Kirklees

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<sup>4,5</sup>.

The annual health cost to society of the impacts of particulate matter alone in the UK is estimated to be around £16 billion<sup>6</sup>.

The air quality issues within Kirklees are focussed around the road network connecting the towns, and traffic which passes between the West Yorkshire conurbation along the M62 and Greater Manchester.

Kirklees Council have conducted monitoring across the district where these primary roads are in close proximity to relevant human activity. To date Kirklees has identified 2 primary pollutants of concern. They are Nitrogen Dioxide and Particulate Matter.

Current trends indicate that the levels of particulate matter has fallen over the last 5 years, which has resulted in the decision to remove an AQMA.

It is noted that between 2012 and 2013 concentrations within the AQMAs and overall fell by roughly  $10\mu\text{g}/\text{m}^3$ . Since that time concentration levels have stagnated within the AQMA 1. Trends within the new AQMA's and at other non AQMA monitoring locations have seen slightly increases by 1 to  $2\mu\text{g}/\text{m}^3$ . This indicates that further measures are needed to return to a downward trend and it must also be noted that the assumptions around the turnover in fleet bringing about required reductions should be treated with caution.

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<sup>4</sup> Environmental equity, air quality, socioeconomic status and respiratory health, 2010

<sup>5</sup> Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006

<sup>6</sup> Defra. Abatement cost guidance for valuing changes in air quality, May 2013

### 3 Kirklees Council's Air Quality Priorities

Kirklees Council published their Corporate Plan 2018-2020 on 19 July 2018, which outlines the priorities for the next 3 years. The primary shared outcomes of the plan are as follows:

- **Best start** - Children have the best start in life
- **Sustainable economy** - Kirklees has sustainable economic growth and provides good employment for and with communities and businesses.
- **Well** - People in Kirklees are as well as possible for as long as possible
- **Safe and cohesive** - People in Kirklees live in cohesive communities, feel safe and are safe/protected from harm
- **Independent** - People in Kirklees live independently and have control over their lives
- **Clean and green** - People in Kirklees experience a high quality, clean, sustainable and green environment
- **Efficient and effective** - Kirklees Council works smart and delivers efficiently and effectively.
- **Aspire and achieve** - People in Kirklees have aspiration to achieve their ambitions through education, training employment and lifelong learning

Full details on the plan are available at:

<http://www.kirklees.gov.uk/beta/delivering-services/pdf/corporate-Plan-201820.pdf>

The Corporate Plan is reviewed annually and results were published 17 July 2019, highlighting the creation of this action plan, the air quality strategy and a number of measures from **Table 6.1** as key measures in delivering the shared outcomes.

The review is available at;

<http://intranet.kirklees.gov.uk/getattachment/News/News-and-Views/Corporate-Plan-2019-Refresh/Kirklees-Corporate-Plan-2019-Refresh-Final.pdf.aspx>

Air quality is named within the Corporate Plan as a primary key measure for success within the Clean and Green outcomes section. The target within the plan is to “Improve air quality via a Kirklees Air Quality Action Plan and other interventions across the Council and with partners.”

As part of the LAQM process Kirklees Council has identified 10 areas, which have exceeded AQO's. Originally 2 locations were identified in 2007, Bradley and Scouthill.

Bradley was declared for the exceedance of the annual NO<sub>2</sub> AQO and further assessment identified that the primary source of pollutants was as a result of vehicle emissions. Source apportionment results contained within table 8.1 were derived as part of this further assessment and used to determine measures, which have been



implemented reduce the concentrations within the area. Since that time, the levels have fallen within the AQMA and as such proposals to reduce the boundary from 78 residential properties to 2 have been accepted by DEFRA. This area will still be included within the new Action Plan from the district and where applicable, specific measures will be identified.

Scouthill was declared for exceedances of the daily PM<sub>10</sub> AQO and further assessment identified that the primary source of PM were from roadside emissions compounded by an elevated background due to neighbouring industrial activities. Through the use of diurnal trends and weather patterns led the council to conclude that exceedances were occurring due to re-suspension of PM and measures were implemented that have resulted in compliance within the AQMA. As such Kirklees Council is in the process of revoking the AQMA completely.

In 2016 a further 7 areas were identified as exceeding Annual NO<sub>2</sub> AQO and following focused studies within these areas Kirklees Council concluded the need for declaration. In 2017, Kirklees Council identified a 1 other area which exceeded the Annual NO<sub>2</sub> AQO. Declaration of these 8 areas increases the number of AQMA's within the Kirklees Council to 10.

A pre-existing Air Quality Strategy and Action Plan are in place and was adopted in 2007. While some of the actions and policies outlined in these documents are still relevant in 2018, majority are either out of date or have been superseded by adoption of other policy documents. As such Kirklees Council plan to replace these documents with this 5 year action plan and the creation of a new overarching Air Quality Strategy for the district.

The most up-to-date policy document currently in use to reduce emissions within the district is the West Yorkshire Low Emission Strategy (WYLES), which provides a regional approach to reducing emissions across a number of work streams including planning, procurement, the electric charging network and freight. This document is used within the district and regionally to inform decision making, strategies and formulate projects to reduce emissions.

The priority of air quality within the corporate plan is also re-enforced in the Kirklees Joint Health and Wellbeing Strategy 2014-2020, which prioritises air quality improvement and its concentrations are a key measure reported to the health as wellbeing board.

16 January 2019 Kirklees Council declared a Climate Emergency and has set up a councillor lead working party to set targets for the district and identify practical measures to reduce emissions. Kirklees Council Environmental Health has representation on this group and is working in partnership with Key Stakeholders to deliver a strategy to as part of the Climate Emergency. It is recognised that there is a clear relationship between Carbon Reduction and Air Quality. As such, the Air Quality Strategy and Action Plan will strongly link with Strategy and Policy constructed as a result of the Climate Emergency. The Action Plan is updated annually and will include greater detail on links to Climate Emergency works/documents upon their development and completion.

Along with these core air quality strategy document, Kirklees Council has a number of other strategic policies that will have impact on climate change and emissions reduction:

- Kirklees Telematics Policy 2017
- Kirklees Employee Handbook 2015
- Kirklees Council Social Values Policy Statement 2013
- Kirklees Climate Local Framework 2013
- Kirklees Climate Change Local Commitments 2013
- Kirklees Flexible, Mobile and Agile Ways of Working Policy Statement 2017
- Kirklees Walking & Cycling Framework 2018
- Kirklees Procurement Strategy 2013
- Kirklees Joint Strategic Needs Assessment: Air Quality 2018
- Highways Asset Management Policy & Strategy Document 2015

Furthermore, Kirklees Council is in the process of developing new strategic documents to promote the reduction of health impacting emissions. These documents are listed below and contained within the action plan schedule of work:

- Kirklees Local Plan Environmental Policy (Adoption)
- New Kirklees Air Quality Strategy
- New Kirklees Air Quality Action Plan
- Kirklees Electric Vehicle Charging Strategy
- Kirklees Climate Emergency Action Plan

Hyperlinks for access to the aforementioned policy documents are available in Appendix C.

## **4 Development and Implementation of Kirklees Council AQAP**

### **4.1 Consultation and Stakeholder Engagement**

In developing/updating 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 4.11.

## Kirklees Council District Action Plan

In addition, during the construction of the document, we have undertaken the following stakeholder engagement to include their input into the document prior to the consultation process on the completed document

- Promotion of the Draft on the Council Website
- Engagement with Anchor Institutions:
  - Kirklees Neighbourhood Housing
  - Huddersfield University
  - Local NHS Trusts
- Engagement with Local Ward Councillors

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

*Table 4.1 - Consultation Undertaken*

<b>Contact Type / Date</b>	<b>Consultee</b>
Submitted to DEFRA LAQM Website	The Secretary of State
Letter 18/06/19	The Environment Agency
Letter 18/06/19	Highways England (The Highways Authority)
Letter 18/06/19	Huddersfield / Calderdale NHS Trust
Letter 18/06/19	Mid Yorkshire NHS Trust
Letter 18/06/19	West Yorkshire Public Health (Public Health England)
Letter 18/06/19	Peak District National Park
Emailed 06/06/19	Kirklees Councillors
Letter 18/06/19	Kirklees Neighbourhood Housing
Letter 18/06/19	Kirklees Active Leisure
Letter 18/06/19	Barnsley Council (Neighbouring Local Authority)

## Kirklees Council District Action Plan

Contact Type / Date	Consultee
Letter 18/06/19	Bradford Council (Neighbouring Local Authority)
Letter 18/06/19	Calderdale Council (Neighbouring Local Authority)
Letter 18/06/19	High Peak Borough Council (Neighbouring Local Authority)
Letter 18/06/19	Leeds City Council (Neighbouring Local Authority)
Letter 18/06/19	Oldham Council (Neighbouring Local Authority)
Letter 18/06/19	Wakefield Council (Neighbouring Local Authority)
Letter 18/06/19	West Yorkshire Combined Authority
Letter 18/06/19	Poundstretcher Ltd (Local Business)
Letter 18/06/19	PPG Architectural Coating UK Ltd (Local Business)
Letter 18/06/19	Principle Global Ltd (Local Business)
Letter 18/06/19	Tandem 1987 Ltd (Local Business)
Letter 18/06/19	BUY IT Direct Ltd (Local Business)
Letter 18/06/19	Hoyer Petrolog UK Ltd (Local Business)
Letter 18/06/19	Syngenta (Local Business)
Letter 18/06/19	Mamas & Papas (Holdings) Ltd (Local Business)
Letter 18/06/19	FMG Support Group Ltd (Local Business)
Letter 18/06/19	Northern Commercials (Mirfield) Ltd (Local Business)
Letter 18/06/19	Thornton & Ross Ltd (Local Business)
Letter 18/06/19	Premdor Crosby Ltd (Local Business)
Letter 18/06/19	Adare SEC Holding Ltd (Local Business)
Letter 18/06/19	The Simplybiz Group PLC (Local Business)
Letter 18/06/19	DW3 Products Holdings Ltd (Local Business)
Letter 18/06/19	Isaac Timmins Ltd (Local Business)
Letter 18/06/19	Myers Group Holdings Ltd (Local Business)

## Kirklees Council District Action Plan

Contact Type / Date	Consultee
Letter 18/06/19	Lawton Yarns Ltd (Local Business)
Letter 18/06/19	ALS Laboratories (UK) Ltd (Local Business)
Letter 18/06/19	DB Santasalo (Local Business)
Letter 18/06/19	AHR Management Services LLP (Local Business)
Letter 18/06/19	South Pennine Academies (Local Business)
Letter 18/06/19	Focus Academy Trust (UK) Ltd (Local Business)
Letter 18/06/19	Waterhead Academy (Local Business)
Letter 18/06/19	The Keys (Local Business)
Letter 18/06/19	National Federation of Plus Areas (Local Business)
Letter 18/06/19	Major Recruitment Ltd (Local Business)
Letter 18/06/19	Local Care Direct (Local Business)
Letter 18/06/19	T.W Broadbent Ltd (Local Business)
Letter 18/06/19	Sun Healthcare Ltd (Local Business)
Public consultation website; Opened 06/06/19 Closed 20/07/19	General Public

### **4.2 Update to Action Plan following public consultation**

Kirklees Council undertook the consultation process over a 6 week period between 06 June 2019 and 20 July 2019. Consultees were able to submit feedback via email or using pro-forma on the council's consultation website. The council received a total of 18 responses to the consultation, details of which are contained within **Appendix A**.

We welcome the feedback we have received and thank stakeholders for their engagement in this process and plan to continue to work with them going forward.

In response to the consultation, Kirklees Council have taken the opportunity to address the feedback received and the Action Plan has been updated to reflect the given observations.

Firstly, one of the primary items of discussion received from a number of different stakeholders centred on measurability of the plan. The plan has been updated in acknowledgement of this need and **Table 6.1**. has been updated to include stronger targets / measurables / indicators in order to review delivery of the action plan.

Stakeholder responses also requested inclusion of a number of direct measures to bring about air quality improvements. The council has considered these requests and in the most part, the requested measures were already included within **Table 6.1** in some form.

The only measure that received high demand from consultees and not be included in the plan related to anti-idling around schools. In acknowledgement of this, action G.68 has been created, in which the council aim to undertake a feasibility study into anti-idling across the district when funding becomes available to do so.

There were also high demands from consultees for the need for Clean Air Zones, Greater Communications, Development Control and Free parking for E.V's across West Yorkshire.

There are a number of measures within the Generic section of the action plan to address the issues arising from Development control and Kirklees Council have included the need for incentivised ULEV parking across West Yorkshire (G.7).

Kirklees Council has considered the viability of a Chargeable Clean Air Zone and determined that delivery would not be feasible. Notwithstanding this, Kirklees Council have included action G.56, which is to undertake a feasibility study into a Non-charging Clean Air Zone for the district.

Finally, we acknowledge the feedback received about communications and are in agreement that there is significant need to provide information and dialogue between stakeholders and the authority. Therefore as a matter of priority, Kirklees Council will be working on action G.44 to evaluate the current information portals and deliver a plan to improve communication with stakeholders.

As stated at the time of the public consultation, the action plan is an iterative process that is reviewed annually and as such continued feedback and input is welcome at any time.

### 4.3 Steering Group

Kirklees Council set up internal steering groups to create, review and deliver the action plan over the 5 year life span of the project. The following departments are represented on the steering group:

- Kirklees Environmental Health
- Kirklees Public Health
- Kirklees Strategic Highways
- Kirklees Planning
- Kirklees Highways Maintenance
- Kirklees Procurement
- Kirklees Parking
- Kirklees Carbon Reduction Team
- Kirklees Neighbourhood Housing
- Kirklees UTMC
- Kirklees Strategic Assets
- Kirklees Transport
- Kirklees Investment & Regeneration
- Kirklees Schools
- Kirklees Street Scene
- Kirklees Highways Safety
- Kirklees Waste

Initial goal of the steering group is to input into the action plan to create a council wide document considering emissions reduction.

Once the document has been ratified by national government, Kirklees Council Environmental Health will lead on delivery of the program, liaising with partners to assist in delivery of each project contained within the action plan. The steering group will meet on bi-annual basis to discuss progress of the plan and update where necessary. Meetings of the steering group are highlighted in **Table 4.2**.

## Kirklees Council District Action Plan

*Table 4.2 Details of Steering Group Meetings*

<b>Meeting Title</b>	<b>Date</b>	<b>Attendees</b>	<b>Comments</b>
Inception Meeting	26 Feb 2018	Full Steering Group	Initial meeting to highlight issues currently, explain the process and request information on activities the council currently does which will have impact on emissions reductions
Delivery Meeting	24 May 2018	Public Health & Environmental Health	Meeting to discuss how to integrate Outcomes Based Accountability into the Action Plan assessment process
Update Meeting	12 Sept 2018	Full Steering Group	Follow up meeting to discuss National Action Plan, impacts to Kirklees and how the action plan will be assessed using OBA
Environment & Health Projects	27 Sept 2018	Public Health Environmental Health Carbon Reduction	OBA Meeting to discuss current projects, future projects and unfunded projects that will have an impact on emissions within the district dealing with health and environment
Strategic Highways Project	2 Oct 2018	Public Health Environmental Health Strategic Highways	OBA Meeting to discuss current projects, future projects and unfunded projects that will have an impact on emissions within the district dealing with Strategic Highways
Development Control	11 Oct 2018	Public Health Environmental Health Planning Policy and Delivery	OBA Meeting to discuss current projects, future projects and unfunded projects that will have an impact on emissions within the district dealing with Development Control
Highways Maintenance and Parking Projects	16 Oct 2018	Public Health Environmental Health Road Safety	OBA Meeting to discuss current projects, future projects and unfunded projects that will have an impact on emissions within the district dealing with highways safety,



## Kirklees Council District Action Plan

Meeting Title	Date	Attendees	Comments
		UTMC Parking	management and parking
Internal Transport Management Projects	30 Oct 2018	Public Health Environmental Health	OBA Meeting to discuss current projects, future projects and unfunded projects that will have an impact on emissions within the district dealing with internal transport.
Kirklees Neighbourhood Housing Projects	21 Jan 2019	Kirklees Neighbourhood Housing	OBA Meeting to discuss current projects, future projects and unfunded projects that will have an impact on emissions within the district from Kirklees Neighbourhood Housing

In addition to the steering group meeting, engagement has been undertaken with councillors, anchor institutions and Highways England to include feasible projects into the action plan. Details on these meeting are contained within **Table 4.3**.

*Table 4.3 Key Stakeholder Meetings*

Meeting Title	Date	Attendees	Comments
Dewsbury East Ward Councillors (AQMA 5)	8 October 2018	Cll Firth Cll Kane Cll Scott Environmental Health	Meeting to discuss current projects, future projects and unfunded projects that will have an impact on emissions within the district and request local input into the process
Birkenshaw & Birstall Ward Councillor (AQMA 4)	12 October 2018	Cll Light Cll Smaje Cll Thompson Environmental Health	Meeting to discuss current projects, future projects and unfunded projects that will have an impact on emissions within the district and request local input into the process
Colne Valley Ward Councillors	17 October 2018	Cll Bellamy	Meeting to discuss current projects, future projects and unfunded projects that will have

## Kirklees Council District Action Plan

Meeting Title	Date	Attendees	Comments
Meeting (AQMA 8)		Cll Griffiths Cll Walker Environmental Health	an impact on emissions within the district and request local input into the process
Ashbrow Ward Councillors Meeting (AQMA 1)	17 October 2018	Cll Homewood Cll Pinnock Environmental Health	Meeting to discuss current projects, future projects and unfunded projects that will have an impact on emissions within the district and request local input into the process
Heckmondwike Ward Councillors (AQMA 7)	30 October 2018	Cll Kendrick Cll Sheard	Meeting to discuss current projects, future projects and unfunded projects that will have an impact on emissions within the district and request local input into the process
Crosland Moor & Netherton Ward Councillors (AQMA 10)	9 November 2018	Cll Kaushik Environmental Health	Meeting to discuss current projects, future projects and unfunded projects that will have an impact on emissions within the district and request local input into the process
Dalton Ward Councillors (AQMA 9)	20 November 2018	Cll Khan Cll McBride Environmental Health	Meeting to discuss current projects, future projects and unfunded projects that will have an impact on emissions within the district and request local input into the process
Highways England Meeting (AQMA's 3,4 & 8)	12 December 2018	Highways England Environmental Health	Meeting to discuss current projects, future projects and unfunded projects that will have an impact on emissions within the district and along highways within their control
Kirklees Neighbourhood Housing (KnH)	21 January 2019	KnH Environmental	OBA Meeting to discuss current projects, future projects and unfunded projects that will have

## Kirklees Council District Action Plan

Meeting Title	Date	Attendees	Comments
		Health	an impact on emissions within the KnH activities.
West Yorkshire Combined Authority (WYCA)	29 January 2019	WYCA Environmental Health	OBA Meeting to discuss current projects, future projects and unfunded projects that will have an impact on emissions within the district and how WYCA could support this.
Kirklees Communications and Marketing Meeting	12 February 2019	Communications and Marketing Environmental Health	OBA Meeting to discuss a collective approach to promote air quality and projects within the district and how Comms could support the action plan
Huddersfield & Calderdale NHS Trust	12 February 2019	H&C NHS Trust Environmental Health	Meeting to discuss current projects, future projects and unfunded projects that will have an impact on emissions within the district and collaborative working between the council and the trust
Newsome Councillors (AQMA 9 & 10)	30 May 2019	Cll Cooper Cll Allison Cll Lee-Richards Environmental Health	Meeting to update councillors on action plan process and discuss current projects, future projects and unfunded projects that will have an impact on emissions.
Crosland Moor and Netherton Councillors (AQMA 10)	30 May 2019	Cll Kaushik Environmental Health	Meeting to update councillors on action plan process and discuss current projects, future projects and unfunded projects that will have an impact on emissions.
Birkenshaw & Birstall Ward Councillors (AQMA 4)	6 June 2019	Cll Smaje Cll Thompson Cll Goodwin Environmental	Meeting to update councillors on action plan process and discuss current projects, future projects and unfunded projects that will have an impact on emissions.

Meeting Title	Date	Attendees	Comments
		Health	
Lindley Councillors (AQMA)	29 July 2019	Cll Burke Cll Eastwood Cll Smith Environmental Health	Meeting to update councillors on action plan process and discuss current projects, future projects and unfunded projects that will have an impact on emissions.

## 5 Source Apportionment

In order to determine appropriate methods which Kirklees Council could employ to reduce Pollution within the district, it is necessary that source apportionment is conducted to identify the primary polluters in the area.

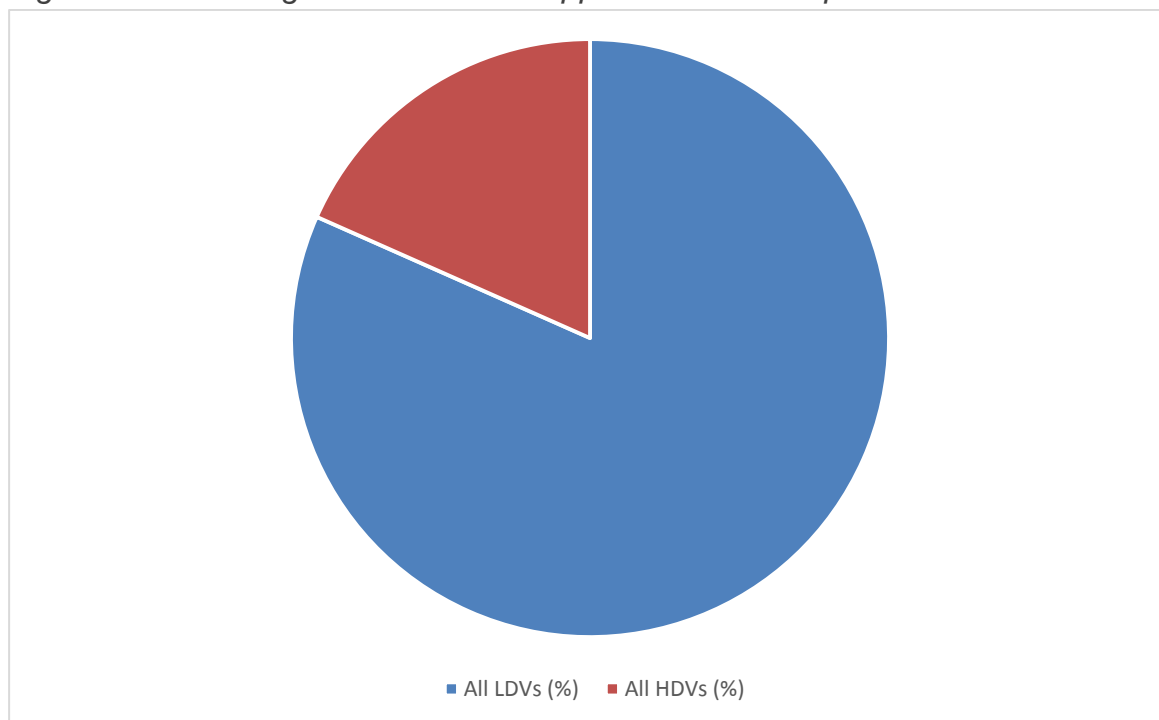
Firstly, it must be noted that 8 of the 10 AQMA's are located at junctions along primary A roads where properties are within 10m of the carriageway and as such, the concentrations are heavily influenced by the stop-start nature of traffic. The remaining 2 AQMAs are located adjacent to the M62 motorway, which results in elevated concentrations due to very high traffic volume.

Emission data obtained from modelling undertaken as part of the LAQM duties which resulted in the declaration of 10 AQMA's. The details for these models are contained within Appendix C.2. Maps for the AQMA's are also included within Appendix C.2

The results generated through the source apportionment exercise were generated using the Emission Factor Toolkit v8.01 and traffic data used within the validated air quality models discussed in the above report. The results of the source apportionment on each individual AQMA is contained within Appendix C.1.

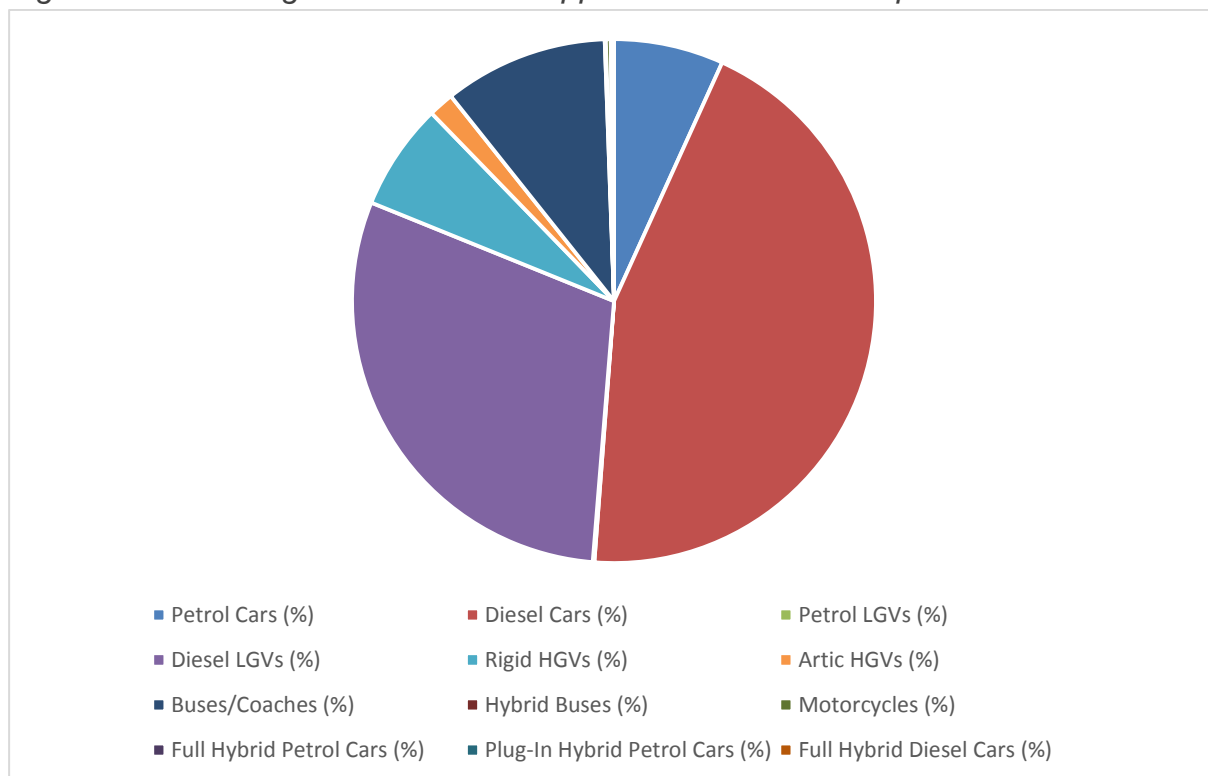
Comparison of the source apportionment results for the 10 AQMA's been broken down in two ways to assist with action plan construction. 9 of the 10 AQMA's have a similar source compositions, which are highlighted in Figure 5.1.

Figure 5.1 – Average AQMA Source Apportionment Composition



NO<sub>2</sub> emissions from the vehicle fleet at 9 of the 10 AQMA's are heavily contributed to by LDV's, with an average of 80% emissions from LDV's and 20% from HGV's. Figure 10.1 has been broken down further in Figure 5.2 to demonstrate the average fleet composition by fuel usage.

Figure 5.2 – Average AQMA Source Apportionment Fuel Composition



Emissions within 9 of our AQMA's are predominantly a result of domestic diesel vehicles or diesel Light Goods Vehicles (LGV's). This composition is common amongst both the motorway influenced roads and also the A road junction AQMA's.

The only AQMA where the composition is significantly different is AQMA 5 and as a result of the AQMA's proximity to the local bus station. Figures 5.3 & 5.4 demonstrates that there is a greater contribution to emissions from the HGV fleet and when the emissions are broken down further there is a greater composition from the bus fleet.

Figure 5.3 – AQMA 5 Source Apportionment Composition

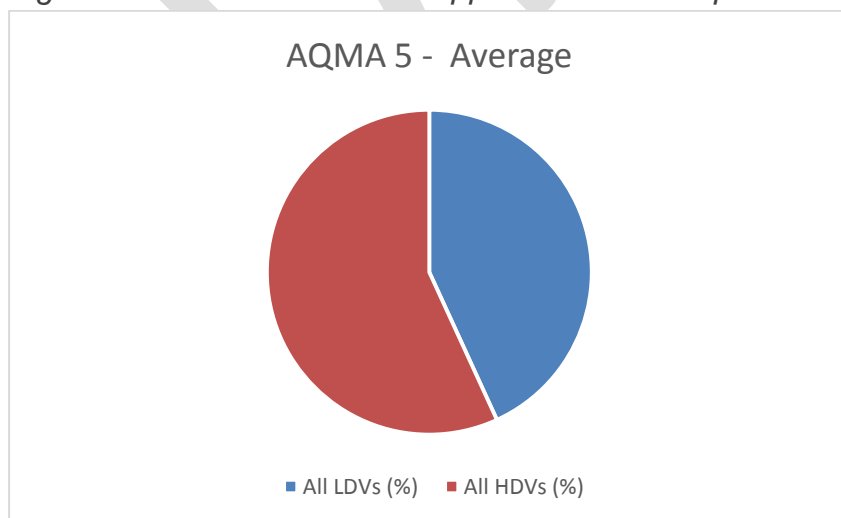
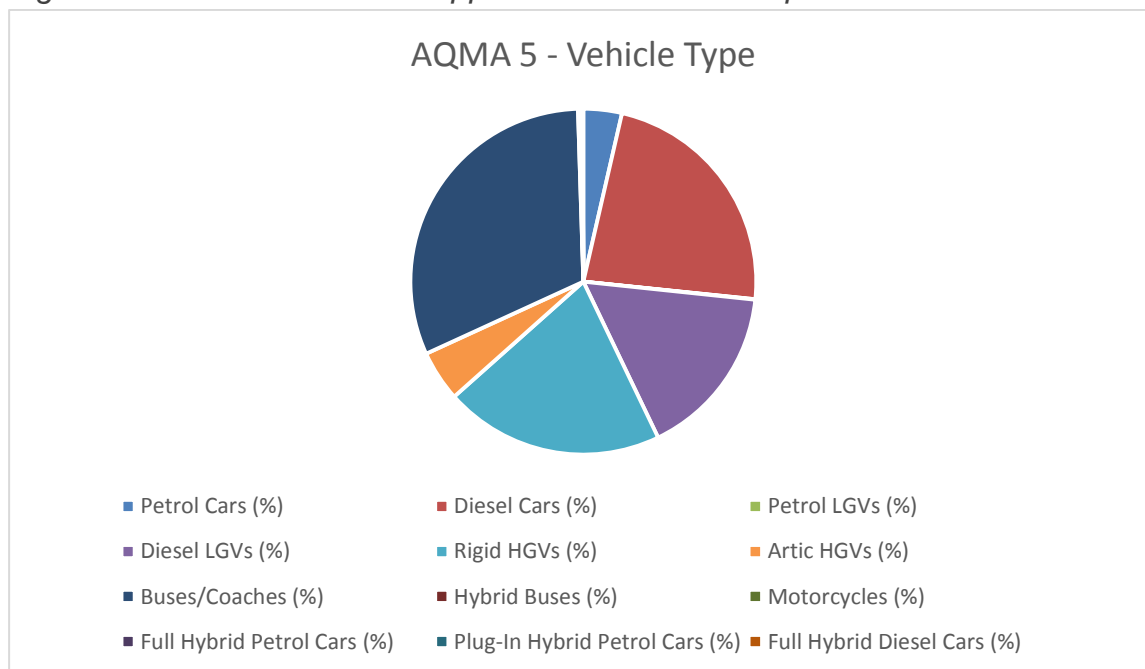


Figure 5.4 –AQMA 5 Source Apportionment Fuel Composition



The information obtained as part of the source apportionment exercise has been used to influence the interventions and mitigation recommended as part of the action planning process. Therefore, there needs to be a focus on flow management, coupled with Domestic and LGV diesel vehicles. Notwithstanding this, interventions centred on the HGV fleet and industry will be included because improvement in all sectors will help to bring about compliance and improve the living environment within Kirklees.

## 6 Air Quality Action Plan Measures

Table 6.1 shows the Kirklees Council AQAP measures. It contains:

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

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

Table 6.1 –Air Quality Action Plan Measures

Measure No.	Measure	Lead Authority	Planning Phase	Implementation Phase	Targets / Indicator / Measurable	Target Pollution Reduction in the AQMA	Estimated Completion Date	Further Data Requirements	Comments
<b>Districtwide Actions</b>									
G.1	Adoption of the West Yorkshire Low Emissions Strategy (WYLES)	Kirklees Environmental Health	2014	2015	<p><u>Kirklees Council Target;</u></p> <p>+Conclusions of WYLES benchmarking project demonstrating full compliance with WYLES Objectives</p> <p><u>Kirklees Council Target;</u></p> <p>Delivery of key WYLES objectives;</p> <p><u>Obj 2. Age of vehicles in bus fleet</u> Measured by; +Change in bus fleet composition towards newer Euro Cat Vehicles</p> <p><u>Obj 3. Electric Vehicle Uptake</u> Measured by increase in the; +Number of newly registered E.V vehicles within Kirklees +Number of E.V's using charging Infrastructure +Number of Green Parking Permits issues within district</p> <p><u>Obj 4. ECO-Stars Freight Recognition Scheme</u> Measured by increase in; +Number of operators signed up within the district +Number of fleet vehicles included in the scheme</p>	NO <sub>2</sub> & PM	2025		<p>Currently adopted within the authority and integrated into Kirklees Council policy and work instructions. This is a 10 year policy document, of which we are in year 4. Further plans outlined in action G.22 for a review of the documents and how they are used. Funding received from Air Quality Grant.</p> <p><a href="https://www.kirklees.gov.uk/beta/crime-and-safety/pdf/WYLES-strategy.pdf">Available at; https://www.kirklees.gov.uk/beta/crime-and-safety/pdf/WYLES-strategy.pdf</a></p>



Measure No.	Measure	Lead Authority	Planning Phase	Implementation Phase	Targets / Indicator / Measurable	Target Pollution Reduction in the AQMA	Estimated Completion Date	Further Data Requirements	Comments
					+Number of Operators improving their ECO-Star scores after re-visits  <u>Obj 6. Taxi Fleet Improvements</u> Measured by; +increase in the number of licensed Hybrid / ULEV vehicles +reduction in the age of the vehicles licensed +reduction in number of diesel vehicles licensed				
G.2	Kirklees Council - workplace active travel	Public Health	2018	2018	<u>West Yorkshire Target:</u> +Sustainable travel mode increase from 36% in 2011 to 42% by 2026  <u>Kirklees Council Targets:</u> +Increase cycling travel mode by 300% between 2018 baseline and 2030 +Increase walking travel mode by 20% between 2018 baseline and 2030  <u>Kirklees Council Measurable:</u> +Number of employees using sustainable travel modes to commute to work.	NO <sub>2</sub> & PM	Ongoing	Staff travel selections	Previously implemented in 2009. Frequency of review and the actual plans are currently under review to ensure they remain relevant and include changes in technology & behaviour since previous iteration. Upon conclusion of the review, conclusions to be implemented and comms plan devised to promote actions within the plans. Once new plans have been adopted, ongoing regular review and promotion will be required to ensure this action is still relevant  Data for evaluation for this measure to be collected from Employee Travel Survey Results

Measure No.	Measure	Lead Authority	Planning Phase	Implementation Phase	Targets / Indicator / Measurable	Target Pollution Reduction in the AQMA	Estimated Completion Date	Further Data Requirements	Comments
G.3	Kirklees Sustainable Travel to school Strategy	Public Health / Economy and Infrastructure	2018	2020	<p><u>West Yorkshire Target:</u> +Sustainable travel mode increase from 36% in 2011 to 42% by 2026</p> <p><u>Kirklees Council Targets:</u> +Increase cycling travel mode by 300% between 2018 baseline and 2030 +Increase walking travel mode by 20% between 2018 baseline and 2030</p> <p><u>Kirklees Council Measurable:</u> +Number of employees using sustainable travel modes to commute to work.</p>	NO <sub>2</sub> and PM	2030	Data development issue – we only have Year 9 survey as intelligence. Question mark over school travel plans. How else will we get this data?	Previously implemented in 2005. Committee set up to review the policy, construction process, pre-existing documents and implementation to reflect changes school operations, in technology and behaviour. Upon conclusion of the review, conclusions to be implemented and comms plan devised to promote actions within the plans. Once new plans have been adopted, ongoing regular review and promotion will be required to ensure this action is still relevant
G.4	Bike-ability training provided to school children	Kirklees Public Health	2009	2010	<p><u>Kirklees Council Targets:</u> +Increase cycling travel mode by 300% between 2018 baseline and 2030</p> <p><u>Kirklees Council Measurable:</u> + Number of children participating in scheme</p>	NO <sub>2</sub> & PM	Ongoing within schools	Bike usage of pupils who have undertaken course versus those that haven't	This scheme is an ongoing project to provide access and training to children on the use of cycling with the long term goals to promote cycling as a leisure activity and also a mode of transport
G.5	City Cycle Grant	Kirklees Public Health	2016	2016	<p><u>Kirklees Council Targets:</u> + Continued use of the scheme, measured by grant uptake +Contributes to the wider target to increase cycling travel mode by 300% between 2018 baseline and 2030</p> <p><u>Kirklees Council Measurable:</u> + Number of grant applications</p>	NO <sub>2</sub> & PM	Ongoing		This scheme is an ongoing project to provide assistance to funding purchases with the long term goals to promote cycling as a leisure activity and also a mode of transport

Measure No.	Measure	Lead Authority	Planning Phase	Implementation Phase	Targets / Indicator / Measurable	Target Pollution Reduction in the AQMA	Estimated Completion Date	Further Data Requirements	Comments
G.6	Green Parking Permit allowing free parking for ULEV Vehicles within Council owned car parks.	Kirklees Economy and Infrastructure	2007	2008	<p><u>Kirklees Council Targets:</u>            +Contributes to wider target to increase in percentage of ULEV registered vehicles within the district year on year in line with national average.            + Contributes to wider target to meet the projected IMF target of 30% of registered cars within the district to be ULEV by 2027            + Contributes to wider target for 100% car sales to be ULEV's within by 2040 in line with national government targets.</p> <p><u>Kirklees Measurable:</u>            + Number of ULEV vehicles registered within Kirklees District</p>	NO <sub>2</sub> & PM	Ongoing within the district	Number of E.V drivers who reside or work within Kirklees	Currently this scheme is available for Kirklees residents and workers. This action is designed to reduce the cost of Electric Vehicles ownership and to increase the uptake of electric vehicle ownership within the domestic market.
G.7	Service level agreements across West Yorkshire for ULEV Parking permits to allow free parking across the region	Kirklees Environmental Health	2019	2019	<p><u>Kirklees Council Targets:</u>            +Contributes to wider target to increase in percentage of ULEV registered vehicles within the district year on year in line with national average.            + Contributes to wider target to meet the projected IMF target of 30% of registered cars within the district to be ULEV by 2027            + Contributes to wider target for 100% car sales to be ULEV's within by 2040 in line with national government targets.</p> <p><u>Kirklees Measurable:</u>            + Number of ULEV vehicles registered within Kirklees District</p>	NO <sub>2</sub> & PM	2019	Number of E.V drivers who reside or work within Kirklees	<p>Currently scheme G.6 is available for Kirklees residents and workers. This project is to expand on the Kirklees Scheme to improve viability for users who move across district boundaries within West Yorkshire.</p> <p>This action is designed to reduce the cost of Electric Vehicles ownership and to increase the uptake of electric vehicle ownership within the domestic market.</p> <p>Builds on the success of our own permitting system and to further promote ULEVs</p>

Measure No.	Measure	Lead Authority	Planning Phase	Implementation Phase	Targets / Indicator / Measurable	Target Pollution Reduction in the AQMA	Estimated Completion Date	Further Data Requirements	Comments
G.8	City Car Club ran within Kirklees district	Kirklees Economy and Resilience	2008	2009	<u>Kirklees Council Measurables:</u> + Number of members within the scheme + Number of car trips for Kirklees based cars	NO <sub>2</sub> & PM	Ongoing within the district		City Car Club is currently available to local residents to use. The scheme reduces vehicle ownership while also providing access to a vehicle when required.
G.9	Finance & Promote Car Sharing Website	Kirklees Economy and Infrastructure	2006	2007	<u>Kirklees Council Targets:</u> + Increased membership on scheme + Increase number of car shares on system  <u>Kirklees Council Measurables:</u> + Number of members on the website + Number of users car sharing	NO <sub>2</sub> & PM	Ongoing within the district	Number of people currently car sharing and whether this intervention influenced them	Currently this scheme is available for Kirklees residents and workers. This action is designed to promote changes to commuter options and to reduce the number of vehicles on the road.  There are 2 car share websites currently promoted by Kirklees Council: <a href="http://www.wycarshare.com">www.wycarshare.com</a>  <a href="http://www.liftshare.com">www.liftshare.com</a>
G.10	E.V Fleet Feasibility Study for council fleet	Kirklees Operational Service	2018	2019	<u>Kirklees Council Targets:</u> +Contributes to wider target to increase in percentage of ULEV registered vehicles within the district year on year in line with national average. + Contributes to wider target to meet the projected IMF target of 30% of registered cars within the district to be ULEV by 2027 + Contributes to wider target for 100% car sales to be ULEV's within by 2040 in line with national government targets.+ Implementation of further recommendation from study upon completion  <u>Kirklees Council Measurables:</u> + Minimum of 27 diesel vehicles to be replaced by 2021 +Number of E.V vehicles within the council fleet	NO <sub>2</sub> & PM	2019		Internal document, which will steer internal fleet purchasing options and help introduction of charging facilities at council depots. Delivery targets to be determined from outcome of survey. Prior to this study, 27 vehicles were identified to be converted to E.V and should be converted by 2021.

Measure No.	Measure	Lead Authority	Planning Phase	Implementation Phase	Targets / Indicator / Measurable	Target Pollution Reduction in the AQMA	Estimated Completion Date	Further Data Requirements	Comments
G.11	Conversion of applicable council fleet to electric vehicles	Kirklees Operational Service	2018	2019	<p><u>Kirklees Council Targets:</u>            +Contributes to wider target to increase in percentage of ULEV registered vehicles within the district year on year in line with national average.            + Contributes to wider target to meet the projected IMF target of 30% of registered cars within the district to be ULEV by 2027            + Contributes to wider target for 100% car sales to be ULEV's within by 2040 in line with national government targets.+ Implementation of further recommendation from study upon completion</p> <p><u>Kirklees Council Measurables:</u>            + Initial replacement of 27 diesel vehicles with E.V's by 2021</p>	NO <sub>2</sub> & PM	Ongoing	Electricity availability at Council Depots	<p>Delivery targets to be determined from outcome of survey outlined in measure G.10            Prior to the study outlined in G.10, 27 vehicles were identified to be converted to E.V and should be converted by 2021.            2018/19 3 EV Vans purchased            2018-21 Transport Capital budget has a commitment to purchase of 24 EV Vehicles.</p>
G.12	Kirklees Bike to Work Scheme	Kirklees Public Health	2008	2009	<p><u>Kirklees Council Targets:</u>            + Continued use of the scheme, measured by grant uptake            +Contributes to the wider target to increase cycling travel mode by 300% between 2018 baseline and 2030</p> <p><u>Kirklees Council Measurable:</u>            + Number of grant applications</p>	NO <sub>2</sub> & PM	Ongoing within the district	Number of employees using the bikes and accessories as part of their commute to work	This scheme is an ongoing project to provide assistance to funding purchases with the long term goals to promote cycling as a leisure activity and also a mode of transport
G.13	Update Kirklees Air Quality Strategy	Kirklees Environmental Health	2018	2018	<p><u>Kirklees Council Measurable:</u>            + Adoption of new 5 year Action Plan</p>	NO <sub>2</sub> & PM	2019		<p>Kirklees Council originally adopted an Air Quality Strategy in 2006. This document has been updated to reflect technology, policy and scientific changes in the Air Quality Sector            This document is in conjunction with the action plan and reviewed periodically in line with Action Plan review process.</p>

Measure No.	Measure	Lead Authority	Planning Phase	Implementation Phase	Targets / Indicator / Measurable	Target Pollution Reduction in the AQMA	Estimated Completion Date	Further Data Requirements	Comments
G.14	Assess planning applications in accordance with procedures in the WYLES Planning Guidance Document and require the relevant mitigation included on development	Kirklees Planning & Environmental Health	2014	2015	<p><u>Kirklees Council Targets:</u></p> <ul style="list-style-type: none"> <li>+Assess all planning applications in accordance with WYLES Planning Guidance Document</li> <li>+ Require developers to integrate air quality mitigation into developments according to size of building project</li> </ul> <p><u>Kirklees Council Measurables:</u></p> <ul style="list-style-type: none"> <li>+ Number of E.V chargers installed within new developments</li> <li>+Section 106 contributions</li> </ul>	NO <sub>2</sub> & PM	Ongoing process	Number of electric vehicle charger installed as a result of the planning process	<p>The Planning Guidance document is a key document contained within G.1. This document is currently used to assess all planning applications and integrated into Local Plan policy documents. As such all planning applications will be assessed against the West Yorkshire Low Emission Strategy Planning Technical Guidance Document and mitigation requirements for each application will be determined according to criteria outlined within the aforementioned document.</p> <p>The planning guidance is available at;</p> <p><a href="https://www.kirklees.gov.uk/beta/crime-and-safety/pdf/WYLES-air-quality-and-emissions-planning-technical-guide.pdf">https://www.kirklees.gov.uk/beta/crime-and-safety/pdf/WYLES-air-quality-and-emissions-planning-technical-guide.pdf</a></p>
G.15	Create a Green Procurement Toolkit	Kirklees Procurement	2018	2019	<p><u>Kirklees Council Targets:</u></p> <ul style="list-style-type: none"> <li>+ Integrate Air Quality as a consideration on all procurement exercises across Council</li> </ul> <p><u>Kirklees Council Measurables:</u></p> <ul style="list-style-type: none"> <li>+ Creation of a Green Procurement Toolkit</li> <li>+Once created, number of procurement exercises assessed against the green procurement toolkit</li> </ul>	NO <sub>2</sub> & PM	Ongoing		<p>The Green Procurement Toolkit is a key outcome from action G.1. A pre-requisite Procurement Guidance document was included part of the West Yorkshire Low Emission Strategy and is to be used to facilitate the creation of a toolkit that ensures a number of environmental impact is a key consideration in procurement exercises</p> <p>WYLES Procurement Guidance Document is available at;</p> <p><a href="https://www.kirklees.gov.uk/beta/crime-and-safety/pdf/WYLES-procurement-guide.pdf">https://www.kirklees.gov.uk/beta/crime-and-safety/pdf/WYLES-procurement-guide.pdf</a></p>
G.16	Subsidised Bus/Rail Card for Kirklees Council Staff	Kirklees Operational Services	Pre 2006	Pre 2006	<p><u>Kirklees Council Targets:</u></p> <ul style="list-style-type: none"> <li>+ Increase in the number of short journeys using public transport</li> <li>+ Reduction in number of low mileage journeys for grey &amp; council fleet</li> </ul> <p><u>Kirklees Council Measurable:</u></p>	NO <sub>2</sub> & PM	Ongoing within the district	Number of miles used on public transport	<p>The passes are made available in accordance with Council Travel plans, action G.2 and because the council is a member of the travel plan network available to businesses in the West Yorkshire Region (see action G.43). As part of the travel plan network, discounted Bus/Rail Cards are available for Kirklees Council employees to purchase. The council also have company rail cards, allowing officers to use public transport in their duties as a council officer. This mode of transport is preferred</p>

Measure No.	Measure	Lead Authority	Planning Phase	Implementation Phase	Targets / Indicator / Measurable	Target Pollution Reduction in the AQMA	Estimated Completion Date	Further Data Requirements	Comments
					+ Number of Bus/Rail Card applications + Number of bookings of the company railcards + Number of trips taken in grey fleet or fleet vehicles that are 1mile or less				for low millage trips or town centre meetings and is a primary tool to reduce the councils fleet emissions.
G.17	Kirklees Policy on Employee Transport (Employee Handbook)	Kirklees Operational Services	2015	2015	<u>Kirklees Council Targets:</u> +Contribute to increase in the number of short journeys using public transport + Contribute to the reduction in number of low mileage journeys for grey & council fleet + Reduce grey fleet mileage + Increase ULEV Council Fleet Mileage year on year from baseline year 2020  <u>Kirklees Council Measurables:</u> +Number of grey fleet miles +Number of Fleet vehicle miles + Number of trips taken using bus/rail cards	NO <sub>2</sub> & PM	Ongoing within the Authority		This is the primary policy document to control employee travel both as part of their commute or within their working capacity. The document outlines best practice for travel options within the work place and also promotes alternative commute options in accordance with council travel plans, action G.2. As such, the document recommendations continue to be relevant and in accordance with the council's ambitions to reduce emissions. Advice contained within the document is to be integrated into a Comms Plan
G.18	Retro-fitting Applicable vehicles within the Bus Fleet with Emissions Abatement Equipment	West Yorkshire Combined Authority & Kirklees	2013 & 2017	2013 & 2018	<u>West Yorkshire Target:</u> + 300 Buses Retrofitted with Exhaust abatement technology by Dec 2019  <u>Kirklees Council Measurables:</u> +Number of buses Retro-fitted	NO <sub>2</sub> & PM	Ongoing Process as funding becomes available	Bus routes that the retro-fitted vehicles use	Bus fleets within the district are key for modal shift and vehicle number controls at the AM and PM peaks. As such it is important that the bus fleet remains a transport option available to the public, but also does incorporate relevant technology to ensure lowest emissions possible. The Clean Bus Technology Fund provides financial incentive to private bus operators to continue to improve their own fleet. Therefore, the council will continue to seek funding within this sector to assist with a full conversion of all Euro V & Euro IV buses within the Kirklees district. Previously, through partnership working with West Yorkshire, we have achieved the following; 2013 - £1m CBTF retrofit of 119 School Buses. School buses were retrofitted in 2014/15 and branding added to sides of the buses to promote pollution reduction. 2018 - £4.1m CBTF plan to retrofit 300 Buses within WY.

Measure No.	Measure	Lead Authority	Planning Phase	Implementation Phase	Targets / Indicator / Measurable	Target Pollution Reduction in the AQMA	Estimated Completion Date	Further Data Requirements	Comments
G.19	Electric Vehicle Strategy	Kirklees Environmental Health	2019	2019	<p><u>Kirklees Council Target:</u></p> <p>+ Creation of an Electric Vehicle Strategy for the District by Dec 2020            +Contributes to wider target to increase in percentage of ULEV registered vehicles within the district year on year inline with national average.            + Contributes to wider target to meet the projected IMF target of 30% of registered cars within the district to be ULEV by 2027            + Contributes to wider target for 100% car sales to be ULEV's within by 2040 in line with national government targets.</p> <p><u>Kirklees Council Measurable:</u>            + Creation and adoption of Electric Vehicle Charging Strategy</p>	NO <sub>2</sub> & PM	2020	Local demand Number of houses without drives  Power Supplies	Currently Kirklees Council have undertaken a number of E.V charging projects to install chargers and also run a green parking permit to reduce the cost of E.V ownership. The strategy is to be created to determine the infrastructure needs within the Kirklees District and to outline an approach to facilitate the move from the combustion engine towards Electric vehicle in both the domestic and commercial sectors within the district
G.20	West Yorkshire ECO-Stars Scheme	Kirklees Environmental Health	2016	2016	<p><u>Kirklees Council Targets:</u>            + Year 2 target to get 30 new member for the West Yorkshire Scheme            + Year 2 target to re-assess 50% of year 1 members (25 re-assessments)</p> <p><u>Kirklees Council Measurables:</u>            +Number of operators signed up within the</p>	NO <sub>2</sub> & PM	Ongoing within the district		The West Yorkshire ECO-Stars Scheme is in its second year, providing free advice to Kirklees businesses on how to reduce cost, with the by-product of reducing emissions. This project is funded by the LTP and will the scheme will remain available to businesses while funding is available Current Status; Year 1 - 51 members Year 2 – Success of the scheme to be reviewed to assist with determining viability for Year 3 of Scheme



Measure No.	Measure	Lead Authority	Planning Phase	Implementation Phase	Targets / Indicator / Measurable	Target Pollution Reduction in the AQMA	Estimated Completion Date	Further Data Requirements	Comments
					district +Number of fleet vehicles included in the scheme +Number of Operators improving their ECO-Star scores after re-visits				
G.21	West Yorkshire Electric Vehicle Taxi Scheme	West Yorkshire Combined	2017	2018	<p><u>Kirklees Council Target:</u>                      +Contributes to wider target to increase in percentage of ULEV registered vehicles within the district year on year in line with national average.                      + Contributes to wider target to meet the projected IMF target of 30% of registered cars within the district to be ULEV by 2027                      + Contributes to wider target for 100% car sales to be ULEV's within by 2040 in line with national government targets.+                      Implementation of further recommendation from study upon completion                      +increase in the number of licensed Hybrid / ULEV vehicles                      +reduction in the age of the vehicles licensed                      +reduction in number of diesel vehicles licensed                      + increase E.V Taxi charger network usage year on year</p> <p><u>Kirklees Council Measurables;</u>                      +Installation of 17 Rapid Chargers within Kirklees</p>	NO <sub>2</sub> & PM	2020		<p>Currently Kirklees Council have undertaken a number of E.V charging projects to install chargers and also run a green parking permit to reduce the cost of E.V ownership.                      This project contributes towards the council's ambition towards Electric vehicle adoption in both the domestic and commercial sectors within the district</p> <p>Estimated installation of 34 Rapid Charging Bays within Kirklees. 17 Taxi Bays and 17 Public Bays</p>

Measure No.	Measure	Lead Authority	Planning Phase	Implementation Phase	Targets / Indicator / Measurable	Target Pollution Reduction in the AQMA	Estimated Completion Date	Further Data Requirements	Comments
					District by March 2020 + Number of licensed Hybrid / ULEV vehicles +Number of vehicles 8 years or older				
G.22	West Yorkshire Low Emission Strategy Officer	Kirklees Environmental Health	2018	2019	<p><u>Kirklees Council Target:</u></p> <p>+Conclusions of WYLES benchmarking project demonstrating full compliance with WYLES Objectives</p> <p><u>Kirklees Council Target:</u></p> <p>Delivery of key WYLES objectives;</p> <p><u>Obj 2. Age of vehicles in bus fleet</u> Measured by; +Change in bus fleet composition towards newer Euro Cat Vehicles</p> <p><u>Obj 3. Electric Vehicle Uptake</u> Measured by increase in the; +Number of newly registered E.V vehicles within Kirklees +Number of E.V's using charging Infrastructure +Number of Green Parking Permits issues within district</p> <p><u>Obj 4. ECO-Stars Freight</u></p>	NO <sub>2</sub> & PM	2021	Assessment of which services are currently working to the WYLES and identify failing areas	<p>The WYLES Officer was employed June 2019 and is working on benchmarking. Officer is to be based at Kirklees and work across the 5 West Yorkshire Authorities to integrate the WYLES and also facilitate regional projects.</p> <p>Currently the strategy adopted within the authority and integrated into Kirklees Council policy and work instructions. This is a 10 year policy document, of which we are in year 4. Further plans outlined in action G.22 for a review of the documents and how they are used. Funding received from Air Quality Grant.</p>

Measure No.	Measure	Lead Authority	Planning Phase	Implementation Phase	Targets / Indicator / Measurable	Target Pollution Reduction in the AQMA	Estimated Completion Date	Further Data Requirements	Comments
					<p><u>Recognition Scheme</u> Measured by increase in; +Number of operators signed up within the district +Number of fleet vehicles included in the scheme +Number of Operators improving their ECO-Star scores after re-visits</p> <p><u>Obj 6. Taxi Fleet Improvements</u> Measured by; +increase in the number of licensed Hybrid / ULEV vehicles +reduction in the age of the vehicles licensed +reduction in number of diesel vehicles licensed</p>				
G.23	Joint Strategic Assessment for Air Quality	Kirklees Public Health	2018	2018	<p><u>Kirklees Council Target:</u> +Continued partnership working between Public Health and Environmental Health + Contribute to the delivery of work streams outlined in KJSA</p> <p><u>Kirklees Council Measurables:</u> + Adoption of the Strategy</p>	NO <sub>2</sub> & PM	2019		<p>Currently the strategy adopted within the authority and integrated into Kirklees Council policy and work instructions. This is a 10 year policy document, of which we are in year 4.</p> <p><a href="http://observatory.kirklees.gov.uk/jsna/airquality">Available at http://observatory.kirklees.gov.uk/jsna/airquality</a></p>

Measure No.	Measure	Lead Authority	Planning Phase	Implementation Phase	Targets / Indicator / Measurable	Target Pollution Reduction in the AQMA	Estimated Completion Date	Further Data Requirements	Comments
G.24	Corporate Carbon Reduction Targets	Kirklees Economy and Infrastructure	2010-11	2020-2021	<p><u>Kirklees Council Target:</u> + Reduction of 15,214t CO<sub>2</sub> by 2021</p> <p><u>Kirklees Council Measurables:</u> + Tonnes of CO<sub>2</sub> reduction per year</p>	<p>Primary Target: CO<sub>2</sub></p> <p>Secondary reductions in NO<sub>2</sub> &amp; PM</p>	2031		<p>Kirklees Council has declared a Climate Emergency and in the process of constructing an action plan to achieve CO<sub>2</sub> reduction goals. Prior to this Kirklees Council has been working towards CO<sub>2</sub> targets outlined in target column. This is an ongoing process with aim of constant reduction, targets of which are subject to change as a result Climate Emergency Board decisions.</p> <p>Air Quality and Carbon reduction have the shared aim of reducing emissions and Kirklees Council are committed to partnership working to reduce both pollutants rather than individual focus</p>
G.25	West Yorkshire Energy Accelerator Project	Kirklees Economy and Infrastructure	2018-19		<p><u>West Yorkshire Target:</u> + Estimated 590kt CO<sub>2</sub> reduction focusing on high emission industrial sector</p> <p><u>Kirklees Council Measurables:</u> + Tonnes of CO<sub>2</sub> reduction per year</p>	<p>Primary Target: CO<sub>2</sub></p> <p>Secondary reductions in NO<sub>2</sub> &amp; PM</p>	2021		<p>Kirklees Council has declared a Climate Emergency and in the process of constructing an action plan to achieve CO<sub>2</sub> reduction goals. This project will contribute towards achieving the targets set out in the Climate Emergency process.</p> <p>The project also has the potential to reduce industrial emissions covered in the Air Quality Objectives.</p> <p>Air Quality and Carbon reduction have the shared aim of reducing emissions and Kirklees Council are committed to partnership working to reduce both pollutants rather than individual focus</p> <p>Currently this project is at business case stage</p>
G.26	Air Quality section to be included in Quality Place Supplementary Planning Document	Kirklees Planning & Environmental Health	2019	2020	<p><u>Kirklees Council Targets:</u> +Assess all planning applications in accordance with WYLES Planning Guidance Document + Require developers to integrate air quality mitigation into developments according to size of building project</p> <p><u>Kirklees Council Measurables:</u> + Number of E.V chargers installed within new developments +Section 106 contributions</p>	NO <sub>2</sub> & PM	Once adopted, use of the SPD would be an ongoing activity		<p>Once the Local Plan is accepted. Kirklees Council planning department to create an SPD. Environmental Health and Planning to work collaboratively to include a robust air quality section which integrates the aims, process and mitigation options outlined in the WYLES Planning Guidance Document.</p>

Measure No.	Measure	Lead Authority	Planning Phase	Implementation Phase	Targets / Indicator / Measurable	Target Pollution Reduction in the AQMA	Estimated Completion Date	Further Data Requirements	Comments
G.27	Trialling Hybrid and E.V Bin Wagon	Kirklees Commercial, Regulatory & Operational Services	2019	2020	<p><u>Kirklees Council Target:</u> + Determine the savings / issues around ULEV Bin Wagons +Promote findings within industry</p> <p><u>Kirklees Council Measurables:</u> + Report on trial impacts</p>	NO <sub>2</sub> & PM	2021		Kirklees Council are currently on a waiting list to borrow a Dennis Eagle Electric Vehicle Bin Wagon and once acquired, will undertake assessment on real world bin routes to determine viability. Upon completion of the study, a report will be constructed and shared with other within the industry.
G.28	Feasibility Study on use of E.V Mobile Maintenance Equipment	Kirklees Commercial, Regulatory & Operational Services	2019	2019	<p><u>Kirklees Council Target:</u> + Determine cost savings of E.V M.M.E + Replace appropriate M.M.E with E.V equivalent +Promote findings within industry</p> <p><u>Kirklees Council Measurables:</u> + Construction of a report outlining viability of E.V M.M.E's  + Number of M.M.E's replaced with E.V alternatives.</p>	NO <sub>2</sub> & PM	2019		Internal document, which will steer purchasing options and help introduction of E.V M.M .E's. Delivery targets to be determined from outcome of survey.
G.29	Feasibility of delivery of Council Officer Car Lease Scheme and delivery (limiting the available options by emission output)	Kirklees Commercial, Regulatory & Operational Services	2019	2020	<p><u>Kirklees Council Target:</u> + Determine the viability of a Council Officer Lease Scheme with built in ULEV promotion</p> <p>Scheme aim is to contribute to; +Contributes to wider target to increase in percentage of ULEV registered vehicles within the district year on year in line with national average. + Contributes to wider target to meet the projected IMF target of 30% of registered cars within the district to be ULEV by 2027</p>	NO <sub>2</sub> & PM	Ongoing activity once implement	Employees current vehicle types and commuter choices	Collaborative working between Transport services and Environmental Health to determine viability of providing low emission transport to employees within the local authority

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					+ Contributes to wider target for 100% car sales to be ULEV's within by 2040 in line with national government targets.  <u>Kirklees Council's Measurables:</u> + Number of ULEV Car Leases				
G.30	Grey Fleet Telematics Trial	Kirklees Commercial, Regulatory & Operational Services	2018	2018	<u>Kirklees Council Targets:</u> +Reduce number of grey fleet miles for the council year on year. Baseline year is year prior to introduction of telematics system +Contribute to increase in the number of short journeys using public transport + Reduce grey fleet mileage + Increase ULEV Council Fleet Mileage year on year from baseline year 2020  <u>Kirklees Council Measurables:</u> + Number of vehicle miles + Number of grey mile trips + Number of service car trips	NO <sub>2</sub> & PM	2019		Currently trialling a dongle that plugs into the vehicle cigarette lighter port and track via GPS and reports to an app. Initially used to data gather and support future projects to reduce grey millage fleet miles. Analysis of the data will allow the authority to identify short journeys and potentially promote use of public transport

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G.31	Master naught Telematics System	Kirklees Commercial, Regulatory & Operational Services	2017	2017	<p><u>Kirklees Council Targets:</u>                      +Reduction in number of Driver accidents year on year                      +Reduction in number of speeding / unsafe driving reports year on year                      +Identify appropriate targeted driver training for safe and eco driving</p> <p><u>Kirklees Council Measurables:</u>                      + Number of speeding exceedances                      +Number of heavy breaking events</p>	NO <sub>2</sub> & PM	Ongoing within the district		Use of the Master naught data allows the Authority to promotes better driving and has already shown a reduction in fleet miles and fuel consumption. Further use of the telematics system can be used for identifying training needs. As such, use of the telematics system is an ongoing process within the lifespan of this action plan.
G.32	Pool Bike Feasibility Study	Kirklees Public Health	2018	2019	<p><u>Kirklees Council Targets:</u>                      +Assess pool bike usage                      +Determine barriers of pool bike system                      +Promote pool bikes                      + Contributes to the reduction in number of low mileage journeys for grey &amp; council fleet                      +Contributes to the wider target to increase cycling travel mode by 300% between 2018 baseline and 2030</p> <p><u>Kirklees Council Measurables:</u>                      + Number of pool bike bookings                      +Number of miles undertaken on pool bike</p>	NO <sub>2</sub> & PM	2019		Kirklees Council public health have set up a pilot project of pool bikes to promote modal shift option for shorter journeys. Exploring the viability of pool bike usage as part of a council fleet
G.33	Robust Travel Survey to determine better travel plans internally	Kirklees Public Health	2018	2019	<p><u>Kirklees Council Targets:</u>                      + Increase the number of completed travel surveys year on year                      +Collect relevant data to assists with decision making process</p> <p><u>Kirklees Council Measurables:</u>                      + Number of Travel Survey responses                      + Yearly report on results of travel survey</p>	NO <sub>2</sub> & PM	2019		Kirklees Council Internal travel survey for all council employees to help better inform further decision making and influence future projects

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G.34	Installation of pollution sensor technology within our AQMA's in conjunction with recognised monitoring to demonstrate validity of new devices	Kirklees Council UTC & Environmental Health	2018	2019	<p><u>Kirklees Council Targets:</u> + Create a report analysing the validity of sensor technology +Analyse cost effectiveness of sensors when measured against existing monitoring tools +Improve accuracy of current AQ monitoring network</p> <p><u>Kirklees Council Measurables:</u> + Report outlining the issues relating to Sensor Technology</p>	NO <sub>2</sub> & PM	2021		This study will be used as part of a rationalisation project to provide the most accurate, cost effective monitoring network to assist the council to safeguard residents and the environment
G.35	Engagement within the district with regional plans on alternative Low Emission Fuel Sources	Kirklees Environmental Health	2019	2020	<p><u>West Yorkshire Target:</u> + Contribute towards regional low emission fuel source projects currently in development</p>	NO <sub>2</sub> & PM	2024		Ongoing regional work exploring introduction of low emission fuel sources into West Yorkshire This is a future project currently going through project planning phase
G.36	Review how Environmental Health delivers regulatory requirements of the Clean Air Act	Kirklees Environmental Health	2019	2020	<p><u>Kirklees Council Targets:</u> + Reduce number of burning / smoking chimney complaints +Increased business engagement +Integrate new Clean Air Act into Kirklees Council work procedures</p> <p><u>Kirklees Council Measurables:</u> + Number of complaints Smoking Chimney Complaints to Environmental Health</p>	PM	Ongoing	Number of domestic solid fuel appliances within the district and locations	Kirklees District is currently a smoke control area and investigates complaints & enforces where required. The process will be reviewed to put the council in a good position for future changes to solid fuel legislation. This process is an ongoing iterative process and planned changes to the Clean Air Act will need to be included into future working practices. As such, completion of this action is reliant on the adoption of the new Clean Air Act, which currently does not have a deadline date.
G.37	Implementation of the Medium Combustion Plant Directive through the planning process	Kirklees Environmental Health / Environment Agency	2018	2018	<p><u>Kirklees Council Target:</u> + All plant meeting directive to be registered with relevant authority + Signpost relevant businesses of directive at development control stage</p>	NO <sub>2</sub> & PM	2030	Number of medium combustion plants	Kirklees Council to work with Environment Agency to discharge requirements of the Medium Combustion Plan Directive



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					<u>Kirklees Council Measurables:</u> + Number of permits issued within the district				
G.38	Zoning project to identify errant PPC businesses	Kirklees Environmental Health	2019	2019	<u>Kirklees Council Targets:</u> + Permit all relevant businesses in accordance with the PPC Regulations.  <u>Kirklees Council Measurables:</u> + Number of errant PPC businesses identified + Number of areas assessed	NO <sub>2</sub> & PM	2020		Kirklees Council routinely inspects businesses requiring permits as prescribed in the Pollution Prevention and Control Regulations. This measure is a piece of work that aims to identify businesses that require permits, but currently do not possess one.
G39	Kirklees Walking and Cycling Strategic Framework	Public Health	2018	2030	<u>West Yorkshire Target:</u> +Sustainable travel mode increase from 36% in 2011 to 42% by 2026  <u>Kirklees Council Targets:</u> +Increase cycling travel mode by 300% between 2018 baseline and 2030 +Increase walking travel mode by 20% between 2018 baseline and 2030 + Increase in number of coaches, leaders & volunteers + Improvement in communication with public  <u>Kirklees Council Measurables:</u> +Creation of a policy document around Walking and Cycling	NO <sub>2</sub> & PM	Ongoing		This is a policy document to outline the council's ambition to promote walking and cycling and also contain a number of measures to assist in achieving the aim. This policy document is currently under construction and once completed will be the primary policy framework for delivering walking and cycling. Therefore, upon adoption, use of this document will be an ongoing process.

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G.40	Kirklees Neighbourhood Housing Solid Fuel Policy	Kirklees Neighbourhood Housing	2018	2018	<p><u>Kirklees Council Targets:</u>            + Prohibit installation of solid fuel stoves            + Educate residents on the policy</p> <p><u>Kirklees Council Measurables:</u>            + Number of Solid Fuel Stoves within KnH properties</p>	NO <sub>2</sub> & PM	Ongoing		Policy prohibits installation of solid fuel stoves. Chimneys are blocked up when gas fires are removed in order to prevent solid fuel use. Completion date has been set as ongoing because of the continuous nature of the action.
G.41	West Yorkshire Travel Plan Network	West Yorkshire Combined Authority	2016	2016	<p><u>West Yorkshire Targets:</u>            + Sustainable travel mode increase from 36% in 2011 to 42% by 2026            + Increase number of local businesses registered as members</p> <p><u>Kirklees Council Measurables:</u>            + Number of Kirklees businesses that are members of the Travel Plan Network</p>	NO <sub>2</sub> & PM	Ongoing		West Yorkshire Travel Plan network visit local businesses and assist with improving employee travel option and promote mode shift. Revisits and frequent promotions to members of the network once assessment has been conducted. AQMA areas are a priority for business engagement. This project is a continuous, though subject to funding requirements. Completion date has been set as ongoing because of the continuous nature of the action.
G.42	Development of a Comms Strategy to promote air quality, mode shift and successful emission reduction projects	Kirklees Environmental Health  Kirklees Communications and Marketing	2019	2019	<p><u>Kirklees Council Targets:</u>            + Creation of a Comms Strategy for AQ, incorporating joint messages for Green Streets, Public Health, Carbon Reduction and other linked work streams            + Improve council website &amp; access to AQ information</p> <p><u>Kirklees Council Measurables:</u>            + Strategy document outlining plans to</p>	NO <sub>2</sub> & PM	Ongoing review process of strategy as funding becomes available		Once the strategy is developed, further targets can be formulated to measure the success of promoting air quality within the district. More costly methods of promotion may not be viable at time on inception, but can be considered as funding becomes available.

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					promote Air Quality +Number of promotion activities				
G.43	Collaborative working with NHS Trusts within District	Kirklees Environmental Health NHS Trusts	2019	2019	<u>Kirklees Council Targets:</u> + Set up liaison program with NHS Trusts + Increase number of linked work streams with NHS Trusts	NO <sub>2</sub> & PM	Ongoing		Kirklees Council has 2 NHS Trust, Mid Yorkshire and Huddersfield Calderdale Trust. As a key partner in the district the council will work with them to promote / deliver low emission projects and policy
G.44	Collaborative working with University of Huddersfield	Kirklees Environmental Health University of Huddersfield	2018	2019	<u>Kirklees Council Targets:</u> + Increase number of linked work streams with Huddersfield University	NO <sub>2</sub> & PM	Ongoing		Kirklees Council has already begun to develop a number of projects with the university. As a key partner in the district the council will continue to work with them to promote / deliver low emission projects and policy
G.45	Collaborative working with Commercial Bus Companies within the district	Kirklees Environmental Health WYCA Local Bus Companies	2018	2019	<u>Kirklees Council Targets:</u> + Set up liaison program with Bus Companies + Increase number of linked work streams with Bus Companies	NO <sub>2</sub> & PM	Ongoing		Kirklees Council has already begun to develop a number of projects with the bus partners and the combined authority. As a key partner in the district the council will continue to work with them to promote / deliver low emission projects and policy
G.46	Collaborative working with Highways England	Kirklees Environmental Health Highways England	2018	2019	<u>Kirklees Council Targets:</u> + Set up liaison program with Highways England + Increase number of linked work streams with Highways England	NO <sub>2</sub> & PM	Ongoing		As a key partner in the district the council will work with them to promote / deliver low emission projects and policy
G.47	De-centralised Energy Use	Kirklees Economy and Infrastructure	Estimate 2019/20	TBC	<u>Kirklees Council Targets:</u> +Contribute towards targets set by Climate Emergency Work Group  <u>Kirklees Council Measurables:</u> + CO <sub>2</sub> reductions	Primary Target: CO <sub>2</sub>	TBC		The plan for this project is to undertake studies into future energy needs and how de-centralised energy supply will impact on emissions.  This is a future project currently going through project planning phase
G.48	Smart Systems to manage energy use within Local Authority Buildings	Kirklees Economy and Infrastructure	Estimate 2019/20	TBC	<u>Kirklees Council Targets:</u> +Contribute towards targets set by Climate Emergency Work Group	Primary Target: CO <sub>2</sub>	TBC		The plan for this project is to integrate smart technology into council buildings to reduce energy usage.  This is a future project currently going through project planning phase

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					<u>Kirklees Council Measurable:</u> + CO <sub>2</sub> Reductions				
G.49	Study the impact of Green Infrastructure	Kirklees Environmental Health	Estimate 2019/20	TBC	<u>Kirklees Council Target:</u> +To assess the validity of the use of vegetation as a mitigation solution +To determine the best vegetation to reduce air pollution +To assess cost effectiveness of Green Infrastructure +Promote findings within industry  <u>Kirklees Council Measurables:</u> + Report determining the impact of Green Infrastructure	NO <sub>2</sub> & PM	TBC		The plan for this project is to undertake a study looking into different vegetation and the impact of green screening along roadsides. This project includes analysing the viability of Moss Trees.  This is a future project currently going through project planning phase
G.50	Generate a pollutions based calculation similar to that currently used in carbon reduction calculations	Kirklees Economy and Infrastructure	Estimate 2019/20	TBC	<u>Kirklees Council Target:</u> + Aim to create a simple calculation which will allow the organisation to determine theoretical NO <sub>2</sub> / PM <sub>10</sub> concentration , which in turn allows firms to set targets similar to Carbon system  <u>Kirklees Council Measureable:</u> + Creation of an easier system for calculating emission impact	NO <sub>2</sub> & PM	TBC		The plan for this project is to create an easier process for calculating emission impacts from projects and schemes.  This is a future project currently going through project planning phase
G.51	Research gathering to inform development of neighbourhood plans as part of Local Plan integration	Kirklees Planning	Estimate 2019/20	TBC	<u>Kirklees Council Targets:</u> + Collected dataset of a quality that allows informed development control decisions to be made  <u>Kirklees Council Measurable:</u> + Report containing data	NO <sub>2</sub> & PM	TBC		The plan for this project is to collect data that can be used to inform the development of the Council's neighbourhood plans This is a future project currently going through project planning phase

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					to inform neighbourhood plans				
G.52	Development Clusters Research and Solution Systems	Kirklees Planning	Estimate 2019/20	TBC	<p><u>Kirklees Council Targets:</u> + To collect a dataset of a quality that allows informed development control decisions to be made</p> <p><u>Kirklees Council Measureable:</u> + Report containing quality dataset</p>	NO <sub>2</sub> & PM	TBC		The plan for this project is to collect data that can be used to inform the development of the Council's Development Clusters This is a future project currently going through project planning phase
G.53	Feasibility Study of current Traffic Model and identify further highways improvement projects	Kirklees Economy and Infrastructure	Estimate 2019/20	TBC	<p><u>Kirklees Council Targets:</u> + Use outcomes from feasibility study to identify other highways improvement projects within the district</p> <p><u>Kirklees Council Measureable:</u> + Report outlining the validity and potential improvements to current traffic model</p>	NO <sub>2</sub> & PM	TBC		The plan for this project is to review the traffic model, validate and make improvements where required. This is a future project currently going through project planning phase
G.54	Voluntary Clean Air Zone Feasibility Study	Kirklees Environmental Health	Estimate 2019/20	TBC	<p><u>Kirklees Council Targets:</u> + Full cost analysis measured against impact of implementing non-charging clean air zone.</p> <p><u>Kirklees Council Measureable:</u> + Report outlining viability of non-charging clean air zone.</p>	NO <sub>2</sub> & PM	TBC		The plan for this project is to undertake a feasibility assessment to determine the costs and impacts of both a Chargeable and Non-Charging Clean Air Zone This is a future project currently going through project planning phase
G.55	Study into the impact of topography onto bus	Kirklees Environmental Health	Estimate 2019/20	TBC	<p><u>Kirklees Council Targets:</u> + Determine the best bus technology to utilise within the district + Promote findings within industry</p>	NO <sub>2</sub> & PM	TBC		The plan for this project is to undertake a research project that looks into the impact topography on ULEV Bus Technology This is a future project currently going through project planning phase

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					<u>Kirklees Council Measurable:</u> +Report demonstrating the most appropriate bus technology to deliver a cost effective low emission service within a district with hilly topography				
G.56	Project to engage with public on solid fuel regarding compliance into UK Clean Air Strategy	Kirklees Environmental Health	Estimate 2019/20	TBC	<u>Kirklees Council Targets:</u> + Reduce number of burning / smoking chimney complaints +Increased business engagement +Reduction in particulate associated with solid fuel  <u>Kirklees Council Measurable:</u> + Number of smoking chimney complaints	NO <sub>2</sub> & PM	TBC		The plan for this project is to devise and run a comms project for both the domestic and commercial sector to promote clean air and smokeless solid fuel practices This is a future project currently going through project planning phase
G.57	Feasibility study into changing internal governance and decision making to further incorporate air quality	Kirklees Environmental Health	Estimate 2019/20	TBC	<u>Kirklees Council Targets:</u> + Use outcomes from feasibility study to identify policy to integrate AQ within  <u>Kirklees Council Measurable:</u> + Report outlining the validity and potential improvements to current policy to incorporate AQ in decision making	NO <sub>2</sub> & PM	TBC		The plan for this project is to undertake an assessment of council working practices and identify areas where improvement could reduce emissions and benefit air quality This is a future project currently going through project planning phase

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G.58	Feasibility Study into On street electric vehicle charging solutions	Environmental Health	Estimate 2019/20	TBC	<p><u>Kirklees Council Targets:</u>            +Contributes to wider target to increase in percentage of ULEV registered vehicles within the district year on year in line with national average.            + Contributes to wider target to meet the projected IMF target of 30% of registered cars within the district to be ULEV by 2027            + Contributes to wider target for 100% car sales to be ULEV's within by 2040 in line with national government targets.</p> <p><u>Kirklees Council Measurable:</u>            + Report outlining the viable solutions to provide charging to properties without off-street parking</p>	NO <sub>2</sub> & PM	TBC		The plan for this project is to undertake an assessment of current E.V infrastructure and devise a funding plan for delivery for future infrastructure This is a future project currently going through project planning phase
G.59	Creation of a delivery plan for Kirklees EV Charging	Kirklees Environmental Health	Estimate 2019/20	TBC	<p><u>Kirklees Council Targets:</u>            +Contributes to wider target to increase in percentage of ULEV registered vehicles within the district year on year in line with national average.            + Contributes to wider target to meet the projected IMF target of 30% of registered cars within the district to be ULEV by 2027            + Contributes to wider target for 100% car sales to be ULEV's within by 2040 in line with national government targets.</p> <p><u>Kirklees Council Measurable:</u>            + Report outlining the a delivery plan to providing</p>	NO <sub>2</sub> & PM	TBC		The plan for this project is to undertake an assessment of current E.V infrastructure and devise a funding plan for delivery for future infrastructure This is a future project currently going through project planning phase

Measure No.	Measure	Lead Authority	Planning Phase	Implementation Phase	Targets / Indicator / Measurable	Target Pollution Reduction in the AQMA	Estimated Completion Date	Further Data Requirements	Comments
					charging network across the district to meet future needs				
G.60	Provision of EV Charging in all communities of Kirklees	Kirklees Environmental Health	Estimate 2019/20	TBC	<p><u>Kirklees Council Targets:</u></p> <ul style="list-style-type: none"> <li>+ Each council ward to have an even spread of charging network per head of population</li> <li>+Contributes to wider target to increase in percentage of ULEV registered vehicles within the district year on year in line with national average.</li> <li>+ Contributes to wider target to meet the projected IMF target of 30% of registered cars within the district to be ULEV by 2027</li> <li>+ Contributes to wider target for 100% car sales to be ULEV's within by 2040 in line with national government targets.</li> </ul> <p><u>Kirklees Council Measurable:</u></p> <ul style="list-style-type: none"> <li>+ Number of chargers in each ward</li> </ul>	NO <sub>2</sub> & PM	TBC		The plan for this project is to provide charging to each council ward to meet ULEV demands This is a future project currently going through project planning phase



Measure No.	Measure	Lead Authority	Planning Phase	Implementation Phase	Targets / Indicator / Measurable	Target Pollution Reduction in the AQMA	Estimated Completion Date	Further Data Requirements	Comments
G.61	Improvements to the Cycling Network, linking all the Kirklees Towns and with neighbouring districts	Kirklees Economy and Infrastructure	Estimate 2019/20	TBC	<p><u>West Yorkshire Target:</u> Contribute to; +Sustainable travel mode increase from 36% in 2011 to 42% by 2026</p> <p><u>Kirklees Council Targets:</u> +Improve pre-existing walking / cycling facilities within district + Connect local towns and neighbouring districts with improved cycling and walking facilities +Increase cycling travel mode by 300% between 2018 baseline and 2030 +Increase walking travel mode by 20% between 2018 baseline and 2030 Improvement in facilities across the district for cycling and clear links between all towns within the district</p> <p><u>Kirklees Council Measurable:</u> +Number of towns connected by cycle network</p>	NO <sub>2</sub> & PM	TBC		The plan for this project is to maintain the current cycling infrastructure and identify where there are gaps between cycle only routes between the major Kirklees towns. Where towns are not connected, this project aim is to connect them with cycle only infrastructure This is a future project currently going through project planning phase
G.62	Use of Technology and publicity to incentivise and increase active travel during commute and business activities	Kirklees Public Health  Environmental Health Transport	Estimate 2019/20	TBC	<p><u>Kirklees Council Targets:</u> +Development of an App to collect data and recommend appropriate methods of transport</p> <p>Contribute towards; +Increase cycling travel mode by 300% between</p>	NO <sub>2</sub> & PM	TBC		The plan for this project is to work with Huddersfield University and a 3 <sup>rd</sup> party company to develop an app that monitors travel and recommend mode of transport. This is a future project currently going through project planning phase  Partnership with Huddersfield University

Measure No.	Measure	Lead Authority	Planning Phase	Implementation Phase	Targets / Indicator / Measurable	Target Pollution Reduction in the AQMA	Estimated Completion Date	Further Data Requirements	Comments
		University of Huddersfield			2018 baseline and 2030 +Increase walking travel mode by 20% between 2018 baseline and 2030  <u>West Yorkshire Target:</u> +Sustainable travel mode increase from 36% in 2011 to 42% by 2026  <u>Kirklees Council Measurables:</u> +Creation of an App promoting model shift  +Number of journeys made by walking / cycling				
G.63	Project to promote and incentivise working at home to reduce commuter miles	Kirklees Council Environmental Health	Estimate 2019/20	TBC	<u>West Yorkshire Target:</u> +Sustainable travel mode increase from 36% in 2011 to 42% by 2026  <u>Kirklees Council Targets:</u> +Alter modern way of working and reduction in commuter miles +Support business to operate in a modern way +Promote best practice currently being adopted within Kirklees Council <u>Kirklees Council Measurable:</u> + Number of walking / cycling trips	NO <sub>2</sub> & PM	TBC		The plan for this project is to run a comm project to promote working from home, both within the council and for 3 <sup>rd</sup> party companies This is a future project currently going through project planning phase Project would promote to companies the benefits of working from home, with the added benefit of emissions reduction.
G.64	E.V research project to identify appropriate demographics and locations within the district.	Kirklees Environmental Health & Public Health	Estimate 2019/20	TBC	<u>Kirklees Council Targets:</u> + Report outlining the best focus for council delivery plan to providing	NO <sub>2</sub> & PM	TBC		The piece of work would involve engaging with the community and looking at purchasing trends to identify the E.V market better and would be used to help inform E.V strategy and infrastructure projects

Measure No.	Measure	Lead Authority	Planning Phase	Implementation Phase	Targets / Indicator / Measurable	Target Pollution Reduction in the AQMA	Estimated Completion Date	Further Data Requirements	Comments
					<p>charging network across the district to meet future needs</p> <p>+Contributes to wider target to increase in percentage of ULEV registered vehicles within the district year on year in line with national average.</p> <p>+ Contributes to wider target to meet the projected IMF target of 30% of registered cars within the district to be ULEV by 2027</p> <p>+ Contributes to wider target for 100% car sales to be ULEV's within by 2040 in line with national government targets.</p> <p><u>Kirklees Council Measurable:</u> +Report outlining demand for ULEV within the district</p>				<p>The plan for this project is to conduct research into the demand for ULEVS within the district to better inform delivery of infrastructure</p> <p>This is a future project currently going through project planning phase</p>
G.65	Feasibility study into the integration of National and Local UTMC	Kirklees UTMC & Highways England	Estimate 2019/20	TBC	<p><u>Kirklees Council Targets:</u></p> <p>+ Linked UTMC system between HE and Kirklees Council systems</p> <p>+Improved Journey Times</p> <p>+Improved Road user experience</p> <p><u>Kirklees Council Measurable:</u> +Report outlining requirements to integrate HE UTMC and Kirklees UTMC</p>	NO <sub>2</sub> & PM	TBC		<p>Project will look at the feasibility of integrating local and national UTMC, which would allow for whole network reactivity during traffic events</p> <p>This is a future project currently going through project planning phase</p>
G.66	Feasibility study into the use of anti-idling measures as a control on emissions, giving focus to areas of poor air quality	Environmental Health	Estimate 2019/20	TBC	<p><u>Kirklees Council Target:</u></p> <p>+To assess the validity of the use of anti-idling as a mitigation solution</p> <p>+To determine the best / appropriate locations for</p>	NO <sub>2</sub> & PM	TBC		<p>Following updates to the legislation from the Environment Bill to undertake feasibility study into the introduction of anti-idling, prioritising areas where there is evidence, through monitoring, there are air quality problems.</p>

Measure No.	Measure	Lead Authority	Planning Phase	Implementation Phase	Targets / Indicator / Measurable	Target Pollution Reduction in the AQMA	Estimated Completion Date	Further Data Requirements	Comments
					anti-idling +To assess cost effectiveness of anti-idling enforcement +Creation of a report determining the impact of anti-idling +Promote findings within industry  <u>Kirklees Council Measurable:</u> + Report outlining feasibility of anti-idling measures within the district				
<b>AQMA 1 Bradley Actions</b>									
AQMA1.1	Install Split Cycle Offset Optimisation technique (SCOOT) Traffic Managements System within AQMA 1	Kirklees Highways UTC	2013	2013	<u>Kirklees Council Targets:</u> + Reduction in queuing times and increased through flow + Reduced stop / start driving style + Increased efficiency in combustion engine process  <u>Kirklees Council Measurable:</u> + Average road speed +AM/PM Queue times	NO <sub>2</sub> & PM	2013		Reduction of pollutants in AQMA 1 of 12ug/m3 and given rise to further works to improve the system.  This was stage 1 of a multi stage improvement project with the aim to reduce emissions through the use of technology to improve flow at junctions. Other stages of the project are discussed in actions AQMA.1.3 and P.9
AQMA1.2	Feasibility Study to Alter SCOOT to incorporate actual Air Quality pollution levels	Kirklees Highways UTC	2016	2017	<u>Kirklees Council Targets:</u> + Report outlining impact of integrating monitors into UTMC system. Looking at cost, flowtimes and pollutant reduction +Reduction in queuing times and increased through flow + Reduced stop / start driving style + Increased efficiency in combustion engine process  <u>Kirklees Council Measurable:</u> + Average road speed	NO <sub>2</sub> & PM	2017		This project was a pre-requisite for the development of project AQMA.1.3 and resulted in collaborative working with our business partners to develop a virtual emissions model to improve UTMC.

Measure No.	Measure	Lead Authority	Planning Phase	Implementation Phase	Targets / Indicator / Measurable	Target Pollution Reduction in the AQMA	Estimated Completion Date	Further Data Requirements	Comments
					+AM/PM Queue times				
AQMA1.3	Kirklees "Virtual Emissions Monitoring Project" to rationalise SCOOT system	Kirklees Highways UTC	2017	2018	<u>Kirklees Council Targets:</u> + Reduction in queuing times and increased through flow + Reduced stop / start driving style + Increased efficiency in combustion engine process  <u>Kirklees Council Measurable:</u> + Average road speed +AM/PM Queue times	NO <sub>2</sub> & PM	2019		Stage 2 of a multi stage Air Quality UTMC improvement project. Stage 3 contained within P.9 and awaiting funding
AQMA1.4	Cooper Bridge Road Improvements Project	Kirklees Economy and Infrastructure	2018	2021	<u>Kirklees Council Targets:</u> + Reduction in queuing times and increased through flow + Increased capacity on the road + Redistribution of vehicles on network  <u>Kirklees Council Measurable:</u> + Average road speed +AM/PM Queue times	NO <sub>2</sub> & PM	2021		The project is a highways improvement scheme within the AQMA and is currently at outline Business Case Stage
AQMA1.5	Resource Smart Corridor	Kirklees Economy and Infrastructure	2015	2019/20	<u>Kirklees Council Targets:</u> + Reduction in queuing times and increased through flow + Increased capacity on the road + Redistribution of vehicles on network  <u>Kirklees Council Measurable:</u>	NO <sub>2</sub> & PM	2021		The project is a highways improvement scheme within the AQMA and is currently at Business Case Stage

Measure No.	Measure	Lead Authority	Planning Phase	Implementation Phase	Targets / Indicator / Measurable	Target Pollution Reduction in the AQMA	Estimated Completion Date	Further Data Requirements	Comments
					+ Average road speed +AM/PM Queue times				
AQMA1.6	Kirklees Northern Orbital Route	Kirklees Economy and Infrastructure	Estimate 2019/20	TBC	<p><u>Kirklees Council Targets:</u>  + Reduction in queuing times and increased through flow  + Increased capacity on the road  + Redistribution of vehicles on network  + Bypass current road network and remove traffic from close proximity to residential properties</p> <p><u>Kirklees Council Measurable:</u>  + Average road speed  +AM/PM Queue times</p>	NO <sub>2</sub> & PM	TBC		The project is a highways improvement scheme within the AQMA and is a future project currently going through project planning phase
AQMA1.7	Trial of Smart UTMC Technology systems within relevant AQMA's	Kirklees Highways UTC	Estimate 2019/20	TBC	<p><u>Kirklees Council Targets:</u>  + Reduction in queuing times and increased through flow  + Reduced stop / start driving style  + Increased efficiency in combustion engine process</p> <p><u>Kirklees Council Measurable:</u>  + Average road speed  +AM/PM Queue times</p>	NO <sub>2</sub> & PM	TBC		<p>The project is a Traffic Light improvement scheme within the AQMA and is a future project currently going through project planning phase</p> <p>Funding sought from 2018 AQ Grant</p>
<b>AQMA 2 Scouthill Actions</b>									
AQMA2.1	A640 Road improvements (Mirfield to Dewsbury)	Kirklees Economy and Infrastructure	2020	Post 2021	<p><u>Kirklees Council Targets:</u>  + Reduction in queuing times and increased through flow  + Increased capacity on the road  + Redistribution of</p>	NO <sub>2</sub> & PM	TBC		The project is a highways improvement scheme within the AQMA and is at very early stages. Pre outline business case stage

Measure No.	Measure	Lead Authority	Planning Phase	Implementation Phase	Targets / Indicator / Measurable	Target Pollution Reduction in the AQMA	Estimated Completion Date	Further Data Requirements	Comments
					vehicles on network <u>Kirklees Council Measurable:</u> + Average road speed +AM/PM Queue times				
AQMA2.2	Program of Deep Cleaning to Paths and Road within the AQMA	Kirklees Environmental Health	2013	2014	<u>Kirklees Council Target:</u> + Keep exceedance of daily PM10 below daily AQO  <u>Kirklees Council Measurable:</u> + Daily Exceedances of PM <sub>10</sub>	Short Term PM <sub>10</sub> Exceedances	Ongoing within the district		AQMA now compliant after this measure was put into place. Number of exceedance days fell from 36 to 6.
AQMA2.3	Extension of Ravensthorpe Train Station	WYCA	2016	2018	<u>West Yorkshire Targets:</u> + Increased services to train station +Increase in patronage  <u>Kirklees Council Measurable:</u> + Number of passengers using Ravensthorpe Station +Number of services stopping at Ravensthorpe Station	NO <sub>2</sub> & PM	2019		The project is a Network Rail improvement scheme within the AQMA and is at delivery stage
AQMA2.4	Use "Virtual Emissions Monitoring Project" to determine operate UTC	Kirklees Highways UTC	2018	2019	<u>Kirklees Council Targets:</u> + Reduction in queuing times and increased through flow + Reduced stop / start driving style + Increased efficiency in combustion engine process  <u>Kirklees Council Measurable:</u> + Average road speed +AM/PM Queue times	NO <sub>2</sub> & PM	2020		Stage 2 of a multi stage Air Quality UTMC improvement project. Stage 3 contained within P.9 and awaiting funding
AQMA2.5	Kirklees Northern Orbital Route	Kirklees Economy and Infrastructure	Estimate 2019/20	TBC	<u>Kirklees Council Targets:</u> + Reduction in queuing times and increased through flow + Increased capacity on the road + Redistribution of vehicles on network + Bypass current road network and remove	NO <sub>2</sub> & PM	TBC		The project is a highways improvement scheme within the AQMA and is a future project currently going through project planning phase

Measure No.	Measure	Lead Authority	Planning Phase	Implementation Phase	Targets / Indicator / Measurable	Target Pollution Reduction in the AQMA	Estimated Completion Date	Further Data Requirements	Comments
					<p>traffic from close proximity to residential properties</p> <p><u>Kirklees Council Measurable:</u> + Average road speed +AM/PM Queue times</p>				
AQMA2.6	Trial of Smart UTMC Technology systems within relevant AQMA's	Kirklees Highways UTC	Estimate 2019/20	TBC	<p><u>Kirklees Council Targets:</u> + Reduction in queuing times and increased through flow + Reduced stop / start driving style + Increased efficiency in combustion engine process</p> <p><u>Kirklees Council Measurable:</u> + Average road speed +AM/PM Queue times</p>	NO <sub>2</sub> & PM	TBC		<p>The project is a UTMC improvement scheme within the AQMA and is a future project currently going through project planning phase</p> <p>Funding sought from 2018 AQ Grant</p>
<b>AQMA 3 Birchencliffe Actions</b>									
AQMA3.1	A629 Road improvements as part of Halifax to Huddersfield Road Scheme	Kirklees Economy and Infrastructure	2016	2020	<p><u>Kirklees Council Targets:</u> + Reduction in queuing times and increased through flow + Increased capacity on the road + Redistribution of vehicles on network</p> <p><u>Kirklees Council Measurable:</u> + Average road speed +AM/PM Queue times</p>	NO <sub>2</sub> & PM	2021		<p>The project is a highways improvement scheme within the AQMA and is currently at Business Case Stage</p>



Measure No.	Measure	Lead Authority	Planning Phase	Implementation Phase	Targets / Indicator / Measurable	Target Pollution Reduction in the AQMA	Estimated Completion Date	Further Data Requirements	Comments
AQMA3.2	Assessment of Cycling Infrastructure between Ainley Top and Huddersfield Town Centre	Kirklees Economy and Infrastructure	2019	2020	<p><u>West Yorkshire Target:</u> Contribute to; +Sustainable travel mode increase from 36% in 2011 to 42% by 2026</p> <p><u>Kirklees Council Targets:</u> Contribute to; + Connect local towns and neighbouring districts with improved cycling and walking facilities +Increase cycling travel mode by 300% between 2018 baseline and 2030 +Increase walking travel mode by 20% between 2018 baseline and 2030 Improvement in facilities across the district for cycling and clear links between all towns within the district</p> <p><u>Kirklees Council Measurable:</u> + Construction of new Cycling Infrastructure within the district</p>	NO <sub>2</sub> & PM	2021		The project is a cycling / highways improvement scheme within the AQMA and is currently at Business Case Stage

Measure No.	Measure	Lead Authority	Planning Phase	Implementation Phase	Targets / Indicator / Measurable	Target Pollution Reduction in the AQMA	Estimated Completion Date	Further Data Requirements	Comments
AQMA3.3	Feasibility into the development of System Activated Planned Cycles	Kirklees Highways UTC	Estimate 2019/20	TBC	<p><u>West Yorkshire Target:</u> Contribute to; +Sustainable travel mode increase from 36% in 2011 to 42% by 2026</p> <p><u>Kirklees Council Targets:</u> Contribute to; + Connect local towns and neighbouring districts with improved cycling and walking facilities +Increase cycling travel mode by 300% between 2018 baseline and 2030 +Increase walking travel mode by 20% between 2018 baseline and 2030 Improvement in facilities across the district for cycling and clear links between all towns within the district</p> <p><u>Kirklees Council Measurable:</u> + Average road speed +AM/PM Queue times</p>	NO <sub>2</sub> & PM	TBC		The project is a UTMC improvement scheme within the AQMA and is a future project currently going through project planning phase
<b>AQMA 4 Birkenshaw</b>									
AQMA4.1	Study into the impact of speed control along the national highway as an emissions reduction tool.	Environmental Health / Highways England	Estimate 2019/20	TBC	<p><u>Kirklees Council Targets:</u> +Work with Highways England to implement the recommendations of the study</p> <p><u>Kirklees Council Measurable:</u> +Creation of a document that determines the impact of speed reduction on the motorway and best method to deliver emissions reduction</p>	NO <sub>2</sub> & PM	TBC		<p>Study into the impact of speed control along the national highway as an emissions reduction tool.</p> <p>This is a future project currently going through project planning phase</p>
<b>AQMA 5 Eastborough Actions</b>									

Measure No.	Measure	Lead Authority	Planning Phase	Implementation Phase	Targets / Indicator / Measurable	Target Pollution Reduction in the AQMA	Estimated Completion Date	Further Data Requirements	Comments
AQMA5.1	Free City Bus for Dewsbury Town Centre	Kirklees Economy and Infrastructure	2005	2006	<p><u>West Yorkshire Target:</u> +Sustainable travel mode increase from 36% in 2011 to 42% by 2026</p> <p><u>Kirklees Council Targets:</u> +Increase bus patronage</p> <p><u>Kirklees Council Measurable:</u> + Number of passengers using service</p>	NO <sub>2</sub> & PM	Ongoing within the district		
AQMA5.2	A640 Road improvements (Mirfield to Dewsbury)	Kirklees Economy and Infrastructure	2020	Post 2021	<p><u>Kirklees Council Targets:</u> + Reduction in queuing times and increased through flow + Reduced stop / start driving style + Increased efficiency in combustion engine process</p> <p><u>Kirklees Council Measurable:</u> + Average road speed +AM/PM Queue times</p>	NO <sub>2</sub> & PM	TBC		<p>The project is a highways improvement scheme within the AQMA and is at very early stages.</p> <p>Pre outline business case stage</p>
AQMA5.4	Install Multi-node SCOOT onto traffic light system in AQMA	Kirklees Highways UTC	2018	2019	<p><u>Kirklees Council Targets:</u> + Reduction in queuing times and increased through flow + Reduced stop / start driving style + Increased efficiency in combustion engine process</p> <p><u>Kirklees Council Measurable:</u> + Average road speed +AM/PM Queue times</p>	NO <sub>2</sub> & PM	2021		<p>This is stage 1 of a multi stage improvement project with the aim to reduce emissions through the use of technology to improve flow at junctions. Other stages of the project are discussed in actions AQMA.5.5 and P.9</p>

Measure No.	Measure	Lead Authority	Planning Phase	Implementation Phase	Targets / Indicator / Measurable	Target Pollution Reduction in the AQMA	Estimated Completion Date	Further Data Requirements	Comments
AQMA5.5	Use "Virtual Emissions Monitoring Project" to determine operate UTC	Kirklees Highways UTC	2018	2019	<p><u>Kirklees Council Targets:</u>  + Reduction in queuing times and increased through flow  + Reduced stop / start driving style  + Increased efficiency in combustion engine process</p> <p><u>Kirklees Council Measurable:</u>  + Average road speed  +AM/PM Queue times</p>	NO <sub>2</sub> & PM	2021		Stage 2 of a multi stage Air Quality UTMC improvement project. Stage 3 contained within P.9 and awaiting funding
AQMA5.6	Trial of Smart UTMC Technology systems within relevant AQMA's	Kirklees Highways UTC	Estimate 2019/20	TBC	<p><u>Kirklees Council Targets:</u>  + Reduction in queuing times and increased through flow  + Reduced stop / start driving style  + Increased efficiency in combustion engine process</p> <p><u>Kirklees Council Measurable:</u>  + Average road speed  +AM/PM Queue times</p>	NO <sub>2</sub> & PM	TBC		<p>This is a future project currently going through project planning phase</p> <p>Funding sought from 2018 AQ Grant</p>
<b>AQMA 6 Edgerton Actions</b>									
AQMA6.1	A629 Road improvements as part of Halifax to Huddersfield Road Scheme	Kirklees Economy and Infrastructure	2016	2020	<p><u>Kirklees Council Targets:</u>  + Reduction in queuing times and increased through flow  + Increased capacity on the road  + Redistribution of vehicles on network</p> <p><u>Kirklees Council Measurable:</u>  + Average road speed  +AM/PM Queue times</p>	NO <sub>2</sub> & PM	2021		Currently at Business Case Stage

Measure No.	Measure	Lead Authority	Planning Phase	Implementation Phase	Targets / Indicator / Measurable	Target Pollution Reduction in the AQMA	Estimated Completion Date	Further Data Requirements	Comments
AQMA6.2	Install Multi-node SCOOT onto traffic light system in AQMA	Kirklees Highways UTC	2018	2019	<p><u>Kirklees Council Targets:</u>  + Reduction in queuing times and increased through flow  + Reduced stop / start driving style  + Increased efficiency in combustion engine process</p> <p><u>Kirklees Council Measurable:</u>  + Average road speed  +AM/PM Queue times</p>	NO <sub>2</sub> & PM	2021		This is stage 1 of a multi stage improvement project with the aim to reduce emissions through the use of technology to improve flow at junctions. Other stages of the project are discussed in actions AQMA.6.3 and P.9
AQMA6.3	Use "Virtual Emissions Monitoring Project" to determine operate UTC	Kirklees Highways UTC	2018	2019	<p><u>Kirklees Council Targets:</u>  + Reduction in queuing times and increased through flow  + Reduced stop / start driving style  + Increased efficiency in combustion engine process</p> <p><u>Kirklees Council Measurable:</u>  + Average road speed  +AM/PM Queue times</p>	NO <sub>2</sub> & PM	2021		Stage 2 of a multi stage Air Quality UTMC improvement project. Stage 3 contained within P.9 and awaiting funding
AQMA6.4	Trial of Smart UTMC Technology systems within relevant AQMA's	Kirklees Highways UTC	Estimate 2019/20	TBC	<p><u>Kirklees Council Targets:</u>  + Reduction in queuing times and increased through flow  + Reduced stop / start driving style  + Increased efficiency in combustion engine process</p> <p><u>Kirklees Council Measurable:</u>  + Average road speed  +AM/PM Queue times</p>	NO <sub>2</sub> & PM	TBC		This is a future project currently going through project planning phase  Funding sought from 2018 AQ Grant

Measure No.	Measure	Lead Authority	Planning Phase	Implementation Phase	Targets / Indicator / Measurable	Target Pollution Reduction in the AQMA	Estimated Completion Date	Further Data Requirements	Comments
<b>AQMA 7 Liversedge / Heckmondwike Actions</b>									
AQMA7.1	Install Multi-node SCOOT onto traffic light system in AQMA	Kirklees Highways UTC	2018	2019	<p><u>Kirklees Council Targets:</u>  + Reduction in queuing times and increased through flow  + Reduced stop / start driving style  + Increased efficiency in combustion engine process</p> <p><u>Kirklees Council Measurable:</u>  + Average road speed  +AM/PM Queue times</p>	NO <sub>2</sub> & PM	2020		This is stage 1 of a multi stage improvement project with the aim to reduce emissions through the use of technology to improve flow at junctions. Other stages of the project are discussed in actions AQMA.7.2 and P.9
AQMA7.2	Use "Virtual Emissions Monitoring Project" to determine operate UTC	Kirklees Highways UTC	2018	2019	<p><u>Kirklees Council Targets:</u>  + Reduction in queuing times and increased through flow  + Reduced stop / start driving style  + Increased efficiency in combustion engine process</p> <p><u>Kirklees Council Measurable:</u>  + Average road speed  +AM/PM Queue times</p>	NO <sub>2</sub> & PM	2020		Stage 2 of a multi stage Air Quality UTMC improvement project. Stage 3 contained within P.9 and awaiting funding
AQMA7.3	Trial of Smart UTMC Technology systems within relevant AQMA's	Kirklees Highways UTC	Estimate 2019/20	TBC	<p><u>Kirklees Council Targets:</u>  + Reduction in queuing times and increased through flow  + Reduced stop / start driving style  + Increased efficiency in combustion engine process</p> <p><u>Kirklees Council Measurable:</u>  + Average road speed  +AM/PM Queue times</p>	NO <sub>2</sub> & PM	TBC		This is a future project currently going through project planning phase  Funding sought from 2018 AQ Grant

Measure No.	Measure	Lead Authority	Planning Phase	Implementation Phase	Targets / Indicator / Measurable	Target Pollution Reduction in the AQMA	Estimated Completion Date	Further Data Requirements	Comments
<b>AQMA 8 Outlane</b>									
AQMA6.1	Study into the impact of speed control along the national highway as an emissions reduction tool.	Kirklees Environmental Health / Highways England	Estimate 2019/20	TBC	<u>Kirklees Council Targets:</u> +Work with Highways England to implement the recommendations of the study  <u>Kirklees Council Measurable:</u> +Creation of a document that determines the impact of speed reduction on the motorway and best method to deliver emissions reduction	NO <sub>2</sub> & PM	TBC		Study into the impact of speed control along the national highway as an emissions reduction tool.  This is a future project currently going through project planning phase
<b>AQMA 9 Huddersfield Town Centre Actions</b>									
AQMA9.1	Free City Bus for Huddersfield Town Centre	Kirklees Economy and Infrastructure	2005	2006	<u>West Yorkshire Target:</u> +Sustainable travel mode increase from 36% in 2011 to 42% by 2026  <u>Kirklees Council Targets:</u> +Increase bus patronage  <u>Kirklees Council Measurable:</u> + Number of passengers using service	NO <sub>2</sub> & PM	Ongoing within the district		
AQMA9.2	Huddersfield Heat Network Scheme	Kirklees Economy and Infrastructure	2018	2020	<u>Kirklees Council Target:</u> +Contribute towards targets set by Climate Emergency Work Group  <u>Kirklees Council Measurables:</u> +Number of boilers removed + CO <sub>2</sub> reductions	NO <sub>2</sub> & PM	2022		Currently at Business Case Stage
AQMA9.3	Resource Smart Corridor	Kirklees Economy and Infrastructure	2015	2019/20	<u>Kirklees Council Targets:</u> + Reduction in queuing times and increased through flow + Increased capacity on the road + Redistribution of vehicles on network <u>Kirklees Council</u>	NO <sub>2</sub> & PM	2021		Currently at Business Case Stage

Measure No.	Measure	Lead Authority	Planning Phase	Implementation Phase	Targets / Indicator / Measurable	Target Pollution Reduction in the AQMA	Estimated Completion Date	Further Data Requirements	Comments
					<u>Measurable:</u> + Average road speed +AM/PM Queue times				
AQMA9.4	Huddersfield Southern Gateway Transport Scheme	Kirklees Economy and Infrastructure	2018	2021	<u>Kirklees Council Targets:</u> + Reduction in queuing times and increased through flow + Increased capacity on the road + Redistribution of vehicles on network  <u>Kirklees Council Measurable:</u> + Average road speed +AM/PM Queue times	NO <sub>2</sub> & PM	2022		At Full Business Case Stage
AQMA9.5	Huddersfield Ring Road Junction Improvements	Kirklees Economy and Infrastructure	2018	2021	<u>Kirklees Council Targets:</u> + Reduction in queuing times and increased through flow + Reduced stop / start driving style + Increased efficiency in combustion engine process  <u>Kirklees Council Measurable:</u> + Average road speed +AM/PM Queue times	NO <sub>2</sub> & PM	2022		At Full Business Case Stage
AQMA9.6	Feasibility Study in to Pedestrianizing Areas of Town Centre for Cycling Access	Kirklees Economy and Infrastructure	2019	2021	<u>West Yorkshire Target:</u> Contribute to; +Sustainable travel mode increase from 36% in 2011 to 42% by 2026  <u>Kirklees Council Targets:</u> Contribute to; + Connect local towns and neighbouring districts with improved cycling and walking facilities +Increase cycling travel mode by 300% between 2018 baseline and 2030 +Increase walking travel mode by 20% between	NO <sub>2</sub> & PM	TBC		



Measure No.	Measure	Lead Authority	Planning Phase	Implementation Phase	Targets / Indicator / Measurable	Target Pollution Reduction in the AQMA	Estimated Completion Date	Further Data Requirements	Comments
					2018 baseline and 2030 Improvement in facilities across the district for cycling and clear links between all towns within the district  <u>Kirklees Council Measurable;</u> + Creation of a document cost analysing benefits of pedestrianizing / cycling only in town centre areas				
AQMA9.7	Trans-Pennine Express Improvement Scheme	WYCA	2018	2019	<u>West Yorkshire Target:</u> Contribute to; +Sustainable travel mode increase from 36% in 2011 to 42% by 2026  <u>Kirklees Council Measurable;</u> +Number of rail passengers	NO <sub>2</sub> & PM	2024		Currently at Business Case Stage
AQMA9.8	Use "Virtual Emissions Monitoring Project" to determine operate UTC	Kirklees Highways UTC	2018	2019	<u>Kirklees Council Targets:</u> + Reduction in queuing times and increased through flow + Reduced stop / start driving style + Increased efficiency in combustion engine process  <u>Kirklees Council Measurable;</u> + Average road speed +AM/PM Queue times	NO <sub>2</sub> & PM	2021		Stage 2 of a multi stage Air Quality UTMC improvement project. Stage 3 contained within P.9 and awaiting funding
AQMA9.9	Input into the	Kirklees	2019	2020	<u>Kirklees Council Targets:</u>	NO <sub>2</sub> & PM	2021		

Measure No.	Measure	Lead Authority	Planning Phase	Implementation Phase	Targets / Indicator / Measurable	Target Pollution Reduction in the AQMA	Estimated Completion Date	Further Data Requirements	Comments
	development of the Town Centre Master Plan	Environmental Health			+Inclusion of Air Quality within the Town Centre Master Plan Document  Contribute towards targets for planning; + Number of E.V chargers installed within new developments +Predicted monetary damage compared against mitigation spend / Section 106 contributions  <u>Kirklees Council Measurables:</u> + Number of E.V chargers within the town centre + Section 106 money spent on town centre AQ improvements				
AQMA9.10	Trial of Smart UTMC Technology systems within relevant AQMA's	Kirklees Highways UTC	Estimate 2019/20	TBC	<u>Kirklees Council Targets:</u> + Reduction in queuing times and increased through flow + Reduced stop / start driving style + Increased efficiency in combustion engine process  <u>Kirklees Council Measurable:</u> + Average road speed +AM/PM Queue times	NO <sub>2</sub> & PM	TBC		This is a future project currently going through project planning phase  Funding sought from 2018 AQ Grant
<b>AQMA 10 Thornton Lodge Actions</b>									
AQMA10.1	Huddersfield Southern Gateway Transport Scheme	Kirklees Economy and Infrastructure	2018	2021	<u>Kirklees Council Targets:</u> + Reduction in queuing times and increased through flow + Increased capacity on the road + Redistribution of vehicles on network  <u>Kirklees Council Measurable:</u> + Average road speed	NO <sub>2</sub> & PM	2022		At Full Business Case Stage

Measure No.	Measure	Lead Authority	Planning Phase	Implementation Phase	Targets / Indicator / Measurable	Target Pollution Reduction in the AQMA	Estimated Completion Date	Further Data Requirements	Comments
					+AM/PM Queue times				
AQMA10.2	Install Multi-node SCOOT onto traffic light system in AQMA	Kirklees Highways UTC	2018	2019	<p><u>Kirklees Council Targets:</u>  + Reduction in queuing times and increased through flow  + Reduced stop / start driving style  + Increased efficiency in combustion engine process</p> <p><u>Kirklees Council Measurable:</u>  + Average road speed  +AM/PM Queue times</p>	NO <sub>2</sub> & PM	2020		This is stage 1 of a multi stage improvement project with the aim to reduce emissions through the use of technology to improve flow at junctions. Other stages of the project are discussed in actions AQMA.10.3 and P.9
AQMA10.3	Use "Virtual Emissions Monitoring Project" to determine operate UTC	Kirklees Highways UTC	2018	2019	<p><u>Kirklees Council Targets:</u>  + Reduction in queuing times and increased through flow  + Reduced stop / start driving style  + Increased efficiency in combustion engine process</p> <p><u>Kirklees Council Measurable:</u>  + Average road speed  +AM/PM Queue times</p>	NO <sub>2</sub> & PM	2020		Stage 2 of a multi stage Air Quality UTMC improvement project. Stage 3 contained within P.9 and awaiting funding
AQMA10.4	Trial of Smart UTMC Technology systems within relevant AQMA's	Kirklees Highways UTC	Estimate 2019/20	TBC	<p><u>Kirklees Council Targets:</u>  + Reduction in queuing times and increased through flow  + Reduced stop / start driving style  + Increased efficiency in combustion engine process</p> <p><u>Kirklees Council Measurable:</u>  + Average road speed  +AM/PM Queue times</p>	NO <sub>2</sub> & PM	TBC		<p>This is a future project currently going through project planning phase</p> <p>Funding sought from 2018 AQ Grant</p>

**Appendix A - Response to Consultation**

**Appendix A, Part 1 – Consultee response Overview**

Table A.1 contains a list of consultee types and reference to specific consultation responses, which have been collated and recorded within Appendix A, part 2.

*Table A.1 - Summary of Responses to Consultation and Stakeholder Engagement on the AQAP*

<b>Category</b>	<b>Reference</b>
Local Councillor	Response A1
Local Councillor	Response A2
Local Councillor	Response A3
Local Councillor	Response A4
Town Council	Response A5
NHS Trust	Response A6
Local Business	Response A7
Local Business	Response A8
Local Civic Society	Response A9
Local Resident	Response A10
Local Resident	Response A11
Local Resident	Response A12
Local Resident	Response A13
Local Resident	Response A14
Local Resident	Response A15
Anonymous	Response A16
Anonymous	Response A17
Anonymous	Response A18

**Appendix A, Part 2 – Consultee responses**

**Response A1**

Some brief points to note,

If the aim of this is to encourage people onto public transport, there has to be public transport that works. Currently there are infrequent and unreliable bus services in my ward. These also seem very expensive so put off working people, as it is far easier, cheaper and quicker to drive.

I also think that there are different challenges across the very different areas within Kirklees. The area I represent is rural and therefore the car is seen as a necessity. Perhaps for people in more urban parts of the district it may be possible to look at public transport as an alternative. The other thing of course is that in the more rural areas, air quality is much less of an issue, because we do not have huge amounts of traffic jams, etc.

Not quite sure what Kirklees can do to encourage people to work at home. This is down to employers. On an infrastructure front, clearly to make this possible, there needs to be high quality, low cost, reliable fibre broadband across the region. Moreover there needs to be a recognition that almost everyone with a job will have an employer who has a policy on whether or not it is permissible to work remotely. It even goes as far as within one organisation having different managers with different opinions on remote working, so clearly there is a challenge here in getting this moving effectively. There are, of course, many jobs that it is not possible to do unless you are physically in the building.

Hope these brief, initial observations are helpful

**Response A2**

I have read the Action Plan which Aidan Hopson shared with us as Councillors. I have not filled in the pro forma feedback form as I am not sure exactly where my comments should lie. I represent the Kirkburton ward and we do not currently have any AQMA in my ward, however I do think there are some shortcomings in the overall strategy which should be addressed.

G65 talks about promoting and incentivising people to work at home and so reduce commuting miles. I fully support this but see nothing in Kirklees's broader economic plans that would support this in the rural south of Huddersfield, there is no planned investment or strategy for these areas. For example, the gigabit proposals for City Fibre focus only on the urban areas where there is reasonable public transport provision, this does not extend to areas such as mine, so people are expected to

commute to access the gigabit provision in our town or further afield, Manchester, Leeds, Sheffield.

I know from local knowledge that most people in this patch commute and do so using public transport and so no doubt contribute to the air quality issues in places like Huddersfield Town Centre, Bradley, Dewsbury etc.

This links to my second point is the failure to recognise in the strategy the role that can be played by public transport provision in the rural south to counteract commuting. We have a train line which is not recognised in the plans (Pennine Line is) and yet an improved service could reduce the traffic heading into Huddersfield from the South. Bus provision is another omission in my mind, as an example the current bus service from my village, Shepley, into Huddersfield takes between 50 minutes & an hour not because of traffic congestion but because of the convoluted route that it takes. I can get into Huddersfield by car in 15-120 minutes even at peak times, so the poor bus provision in the area is actually forcing people to commute by car and so contribute to the congestion and poor air quality in town and on the commuter routes to Leeds.

I would like to see these points acknowledged in the action plan as it seems to suggest that South Huddersfield, which does not have a AQMA is therefore not a contributory factor to the problems we face and I would dispute this and suggest the lack of strategies for this area are contributing to problems elsewhere.

### **Response A3**

Have looked at the action plan and table for Birkenshaw. There is very little information for Birkenshaw other than stating the zone. No schemes are listed as part of the plan that would help the problems in Birkenshaw at all. The item that research is going to be done to help with integration of local plan is going to be too late for us in Birkenshaw as planning requests are currently being put in for development of houses next to the air quality action zone. This would mean over 300 houses extra next to the zone. Nor is there anything about working with Highways England re the motorway. Nor is there anything any connections to the proposed Bradford link road, or the extra houses planned by Bradford that would impact on our roads. Surely there should be something in the action plan about working with neighbouring councils on assuring that the effects of development do not increase the problems with air quality.

I cannot see a very definite link to health or the JSA in the plan. There are some generic statements but nothing about health conditions in the areas of the zones. Why not? Better Linkages should be made to health inequalities.

### **Response A4**

**Did you find the document clear to understand?:** Not really - Exec summary was far too short but included preamble, whilst the full report was too long !

**What are your thoughts on the targets set out within the document?:** Fine

**What are your thoughts on the actions presented within the table?:** Fine

**Are there any areas/specific projects you feel have not been covered as part of the plan?:** It would have been good to have identified and acknowledged other areas in Kirklees where there are air quality concerns and perhaps to have given pollution readings - and to have a plan showing how they will be monitored and to introduce reduction measures at these locations too.

**Are there any other comments you wish to make relating to Air Quality or this Action plan?:** The work focuses on locations where readings are high - is there also a need to look at air quality for people who spend long times on or near our road network - i.e. professional drivers, Street / Place workers (e.g. School Crossing Patrol), utility workers etc, and to give advice.

### Response A5

The following motion was resolved at our meeting 2nd July 2019 regarding the above:

MTC52/2019 (2)

Cllr Naisbett Proposed MTC send the following response to Kirklees: MTC are concerned that the last survey in 2017 may be incorrect. There is currently no data to say what the air pollution could be if the Cooper Bridge Link goes ahead. All roads out of and in to Mirfield are congested at Peak times with excessive queue lengths. From Mirfield's perspective the air quality is lamentable in Mirfield and the report shows unrealistic length of traffic flow i.e. Norristhorpe Lane – Sunnybank 2.41 minutes. MTC believe the Local Plan will have significant impact on traffic from Cooper Bridge to Dewsbury Riverside, with no reference in the report of proposed developments within the Local Plan, which could have a significant impact on air quality within Mirfield. MTC are concerned that there is sensory equipment within the AQMA areas but not in areas not in AQMA, which will not show how levels have changed since the report was conducted. MTC believes Kirklees to be disingenuous with journey times and queue lengths within Mirfield. MTC would also request Kirklees look at natural means of absorbing noxious substances like moss walls Cllr Guy Seconded Vote: All in favour

### Response A6

**Did you find the document clear to understand?:** Yes

**What are your thoughts on the targets set out within the document?:** There's no specific numerical targets, just the primary or secondary pollutant.

**What are your thoughts on the actions presented within the table?:** They do not seem to be prioritised in terms of actions that will have the greatest impact, a timeline for achieving targets. Table is quite confusing as some actions are older/expired.

**Are there any areas/specific projects you feel have not been covered as part of the plan?:** No

**Are there any other comments you wish to make relating to Air Quality or this Action plan?:** Calderdale and Huddersfield NHS Foundation Trust will be updating the Sustainable Development Action Plan, and air quality actions will be included. We are also looking to provide more provision for electric vehicles and tendering for new fleet, specifying minimum of hybrid vehicles.

New Environment Manager in place since May 2019

### **Response A7**

#### **Introduction**

Consulting With Purpose Ltd. (CWP) are primarily Sustainability, Renewable Energy, Waste to Energy, Standardisation, Certification and Accreditation, Policy and Regulations Consultancy based in Huddersfield. Our CEO also is a shareholder in a wind energy company based in Kirklees.

Our experience of Air Quality comes mainly through our work on electric and heating networks and transportation. We have advised Kirklees Council on a number of projects over the years, including the provisions for a heat network and on eco-industrial parks, a for runner to the circular economy discussions.

#### **Responsibilities and Commitments**

The council commit to reviewing the AQAP annually, appraisal of progress and reporting to the relevant Council Committee. However, in the introduction there appears to be a 5 year review period in the worst case. We would like the council to commit to an annual review and integrate this with the Climate Emergency Motion commitments in as much as improving air quality and reducing the Carbon Dioxide Equivalent Emissions (CO<sub>2</sub>e) go hand in hand.

#### **Consultation and Stakeholder Engagement**



From the Table 4.1 it is unclear whether due process of consultation has fully been achieved at this stage. E.g. There is no confirmation whether the stakeholders have been consulted with or not – as there is no ‘yes’ or ‘no’ indicated in the table.

We note that Huddersfield Town Centre has moved wards into Netherton, given this is the ward our company resides in and is an important ward, it would be helpful that the document specifies the ward correctly.

### **Source Apportionment and Emission Reduction Activities**

The consultation document highlights some 67 measure in table ? on pages 21-34, which many are due for implementation. Are there targets against these strategies? And for those that have been implemented for a while the document does not confirm how successful they have been at changing behaviour or reducing emissions. It would have been useful to see that information as part of the consultation to see how well the council implements measures, given the vast number that are now being proposed.

### **Electric and Alternative Fuel Vehicles**

In figure 6.2 – Average AQMA Source Apportionment Fuel Composition you have 12 categories of vehicle by fuel and yet only 6 segments on the graph. There is no percentage figures and no identification of what the other categories represent in terms of emissions apportionment. This does not allow for easy engagement with the data.

Your assertion is that the predominant emissions from within the 9 AQMAs are from domestic diesel vehicles or diesel Light Goods Vehicles (LGVs). Have the emissions from Plug-in Hybrid Vehicles (PHEV), Full Hybrid Diesel Cars (FHDC) and Full Hybrid Petrol Vehicles (FHPC) been evaluated against their use in electric mode, to establish if promoting and establishing low emissions zones or other such measures will be effective with hybrid vehicles as opposed to battery only versions? We see this as an issue, not only in establishing the Battery Electric Vehicle (BEV) in the market for light vehicles of all types but also as a potential lost opportunity to move away from fossil fuels in the district.

For instance, if the Council were to decide to develop a utility scale Renewable Energy company, then moving the demand away from fossil fuels and towards electric charging from locally sourced renewable energy could provide bigger benefits than moving vehicles from fossil fuel only to hybrid. These kinds of a policy decisions by the Authority could easily benefit cleaner transportation and green jobs through infrastructure development and sustainable employment in the motor trades.

Further concentration should also be made in developing strategies and policies that stimulate the use of alternative fuels (electric and hydrogen) for other types of road transport. While these markets are embryonic and limited at the moment, Kirklees

could potentially lead by example and work with the anchor organisations in the district to stimulate the demand through providing a pilot hydrogen fuelling station.

None of the above takes away from the clear policy of reducing transport movements by private and commercial vehicles, which we note is a clear policy direction.

It is noted, that the document states, there are already BEV charge points across the Kirklees district, which have been part of the Kirklees previous activities. Being an Electric Vehicle driver, it would be useful to understand where these are, their charge rates and if they are available to non-Kirklees Council employees as we have not seen any such charge points in Kirklees?

We understand that the council as part of the West Yorkshire Combined Authority (WYCA) are to receive a number of rapid charge points in the district. Rapid charge points are generally considered to be greater than 50kWh. With the increased battery capacity of BEV the lower rated rapid charge points may not be fast enough for some motorists.

We would also urge the council to consider the dwell-time of those using the charge points in key locations, such as, surrounding the town centres, as reliance on rapid charge points may distort the effects of dwell-time in areas the Council is already trying to regenerate with major investments and infrastructure projects. E.g. having rapid charge points with 45-minute charge limits in areas where the experience would better be suited to 2-4 hour dwell-times. While these are not directly Air Quality issues, the impact of air quality policies and drivers may have a significant effect on other Council strategies.

If the council provide dedicated electric vehicle charge points (EVPs) in the district for taxis, that then use them with hybrid cars (see above), the emissions benefit will be diminished substantially against the requirement for BEV taxis. There are a number of geographic locations and taxi firms where taxi fleets are all BEV and we would encourage the council to ensure that the taxi fleets in Kirklees are '*nudged*' into using BEV and not PHEV vehicles. Range cannot be used as an excuse for taxis to be PHEV any longer.

It would be useful to understand how many vehicles are registered in Kirklees and how many enter Kirklees on a regular basis for work and other activities. Relating this over the five year period would be useful in evaluating the impacts from the reduction of vehicles in favour of public transport and in the changing mix of drivetrains being used.

While we assume pure (BEV) are not categorised on figure 6.2 chart due to the low volume and the fact that they do not give off NO<sub>x</sub>, it would be useful to understand the PM<sub>2.5</sub> and PM<sub>10</sub> starting point for all vehicles given that there is a significant discussion with regards to the potential emissions reduction not being achieved even

if we move to more BEVs. Has the council any data to quantify the emissions from tyres and brakes as a baseline?

If we are to rapidly increase the use of BEV vehicles at all scales and for all logistical requirements, it would also be helpful if the council provide the strong 'nudge' stimulus for commercial and public vehicles to utilise these technologies. Therefore, strategies for having deliveries with BEV vehicles could not only ensure lower emissions but could also help with the Huddersfield Town Centre (HTC) regeneration by providing quite deliveries at night, thereby not disturbing residents.

We applaud the free parking scheme for BEV vehicles around our towns and would ask as part of the WYCA and WYLES programmes that this be integrated into a broader region wide scheme that allows vehicles to park not just in Kirklees but also the whole of the Leeds City Region. This would help stimulate the uptake of BEV vehicles commuting and business in general.

### **Clean Air Zones (CAZ)**

While we appreciate that Kirklees has not been allocated as a Clean Air Zone under the government funding schemes, we have a concern that the CAZ in Leeds could have a detrimental effect on Kirklees public transport emissions by moving the less efficient vehicles out to Kirklees. Kirklees should be looking for and expecting the same emissions reducing vehicles as on our roads as in the formal CAZ.

What evaluation of measure to introduce a CAZ have been made for Kirklees main towns? It would be useful to understand that evaluation as part of the consultation exercise.

As an interim measure we would suggest the implementation of no idling zones around key establishments and emissions hot spots, particularly around schools and areas where vulnerable people are.

### **Cycling and Walking**

While we note a number of good initiatives for increasing walking and cycling and we note the emphasis on these in the recently published Huddersfield Town Transformation, these will only be accepted if there are safe routes and safe cycle storage. It should also be recognised that many of our public services do not serve our rural communities well and therefore lead to more private car and taxi use. Making it easy to get a bus stop, having reliable transport, in a timely manner and at times needed throughout the day will be a crucial aspect of persuading people to walk to the public transport. From the position of using rail and bus as part of a journey, it will be necessary to have more access to bike facilities on the trains and buses.

Better still, having a bike borrow scheme in the town centres would encourage more cycling within the towns and to outlying flat areas. Another aspect of cycling would be to have an ability to have more than one cycle as they have in the Netherlands and to some extent in London where cycle parks at bus and train stations facilitate the ability to commute on a bus or train and then take your bike to the final destination or vice versa.

However, that only works if the costs are perceived to be commensurate with the journey.

Given our geographic location, for many that could walking and cycling are not perceived as such a great option and while encouraging these forms of mobility for many good reasons, such as, health and wellbeing, there needs to be a recognition as to how to enable people to do this without making them feel guilty or disenfranchised.

We support the idea of “quiet routes” and providing more space for parking bikes securely. However, going up some of our big hills and travelling to the further reaches of the district need to be considered in terms of single trip access for bikes, to allow people to start with taking short journeys on foot and using public transport and building up to more strenuous activity. Riding downhill is great, even with a pannier of documents or shopping but getting back up again is much more daunting and restricting.

We would support additional supplementary planning guidance requiring more funds to go to linking any new development with cycle routes and for the council to have a strategy that includes developing the networks into an integrated transport mode between towns and new developments.

### **Response A8**

#### **1. Introduction**

We welcome the draft five-year Air Quality Action Plan (AQAP) for Kirklees. Progress on air quality has been slow since the publication of the West Yorkshire Low Emission Strategy in 2015.

To successfully combat poor air quality will require a range of local actions, some of which will take time to implement. It is clear that West Yorkshire Combined Authority (WYCA) through City Connect is gradually implementing or a programme of measures to increase the infrastructure for cycling but there is a lack of urgency in the draft AQAP. We need to see continued increase in the proportion of trips made by walking and cycling and by public transport. Similarly we need to accelerate the adoption of ultra low carbon vehicles and the measures employed to date have not resulted in significant take up.

Nationally the conditions are not all favourable to reducing pollution from motor vehicles and many of the trends are in the wrong direction. Use of the bus is declining; costs of public transport continued to increase faster than the cost of motoring; new petrol and diesel cars sold in 2018 had emission ratings than in 2017, (Note 1). These trends illustrate how the government has failed to create conditions for a growth in walking, cycling and public transport use.

### 2. Clean Air Zones (CAZ)

We would like to see a more detailed analysis of the use of Clean Air Zones (CAZ) in the AQAP, even if initially it is established as an *Advisory* CAZ. We believe that the introduction of a large zone in Leeds from spring 2020 will make this proposal increasingly relevant to promote clean air in Kirklees.

We also propose the use of **no idling** bans in streets close to school gates. Initially this could be established at the most polluted of Kirklees schools to demonstrate how to enforce such a ban.

### 3. Modal shift

There is a need to measure progress in achieving modal shift on all local journeys as part of setting long term targets. Our aim should be to expand cycling and walking and use of public transport and reduce the number of trips by private car.

The adoption of targets for cycling, public transport and car use for the relevant travel to work areas for 2024 and 2029 would help to demonstrate that progress is being made.

### 4. Cycling and walking

We want to see more recognition of **cycling as a transport mode**, particularly in the flatter areas (e.g. into Huddersfield from valleys, using new “quiet routes” alongside A629 to Lindley and links into town from Dewsbury, Mirfield and Brighouse using routes that parallel the Leeds Road/Huddersfield Broad canal.) This will require effective links from/to Huddersfield town centre (railway station, civic centre) across or under the ring road, to integrate the main feeder routes.

Delivering an integrated cycling and walking strategy, which builds on the successful greenways, needs to be more clearly shown as a strategic element of the 5-year plan.

We propose a planning requirement (supplementary planning guidance) for developers to fund the **links from new housing to cycling and walking routes**.

In planning new housing the cycling, walking and public transport links are often not future proofed. Growth in car ownership in new developments can only be arrested by a series of improvements in the alternative travel options.

**More secure cycle storage** for people working or studying or attending events in the major towns is needed to encourage cycle use, particularly e-bikes. Parking on street is also now possible for cycles using existing car parking spaces – showing that bikes are also road users and a transport mode.

**Support for schools in developing and implementing travel plans** is no longer available and is increasingly desirable. Kirklees Council needs to partner with voluntary sector organisations to secure funds for promoting cycling, wider use of e-bikes and cycle maintenance in schools from bodies such as UK Cycling.

### 5. Traffic reduction/public transport

By promoting modal integration we can encourage **traffic reduction**. Effective use of bus and rail needs more facilities for multi-modal travel – through expanding **Park and Ride (P&R)** – and better integration of modes.

In Kirklees one way this could be achieved is a commitment to expanding use of rail (which itself needs key investment decisions made by Network Rail, WYCA and South Yorkshire authorities) and by expanding car parking and secure bike parking at selected railway stations.

In particular the potential of the **Penistone Line** to reduce car traffic travelling into Huddersfield has been ignored consistently by Kirklees Council and WYCA. Its potential is that much greater if the frequency is increased and the use of P&R made possible.

To increase passenger numbers is a long-term objective as it would require investment in track and rolling stock to permit half hour services. Land would be required at stations for increased parking (e.g. at Honley). Its potential contribution to the local economy and environment has regularly been demonstrated by the Huddersfield, Pensitone and Sheffield Rail Users Assocation (HPSRUA)

There is also a need for expanded services on trains on the Transpennine stations in Kirklees (e.g to allow more cycles to be carried).

### 6. Cleaner vehicles

The plan lacks a comprehensive strategy to encourage mainstream adoption of ultra low emission vehicles (ULEVs). A future plan for **recharging points** is not spelt out.

Kirklees Council adoption of ULEVs is welcome but we need to encourage **fleet users to work together to adopt** more use of ULEVs (e.g. NHS Trusts, University of Huddersfield, larger local private sector operators).

**All taxi and Private Hire (PH) vehicles** need to be cleaner by 2023 and progressively improved. Use of diesel vehicles as taxis and private hire should be phased out by 2025. A progressive policy of reducing fees for ULEVs and raising them for polluting diesels would assist this policy. In addition the taxi owners will

need help from the licensing authority in promoting the business case for hybrids and ULEVs (as undertaken by Leeds City Council).

Given the effect of motorway traffic on air quality, it is noticeable that support for the AQAP has not been offered by Highways England.

**The free car parking** concession for ULEVs on streets and sites managed by Kirklees Council needs effective promotion to make more people aware of this facility, which will encourage more people to switch to fully electric.

**Local householders without parking on site** cannot charge at home. We would like to see proposals to support such households to switch to ULEVs through the use of on-street recharging (e.g. through lighting columns).

### 7. Adopting the plan

**The monitoring of AQ in all Kirklees Council policy decision** needs urgent adoption at committee level along with **Climate Emergency**. The AQAP does not yet acknowledge the implications of the climate emergency stance of Kirklees and WYCA.

#### Note 1

**Campaign for Better Transport has reported on** declining bus use outside London and continuing increases in the costs of bus and rail travel which has increased faster than the cost of motoring

**Transport & Environment** (June 2019) Rising CO2 emissions a problem of carmakers own making as they push SUVs but hold back electric cars

#### Response A9

##### 1. Introduction

We welcome the draft five-year Air Quality Action Plan (AQAP) for Kirklees. Progress on air quality has been slow since the publication of the West Yorkshire Low Emission Strategy in 2015. Action to improve air quality is measurable, but only if a performance measurement methodology is put in place. We recommend that this includes agreed targets; baselines; monitoring frequency; inputs and outputs. We also recommend a higher level of Council-led public engagement regarding the results of air quality monitoring. The likelihood of public support (and action) will be increased through transparent communication of trends. To successfully combat poor air quality will require a range of local actions, some of which will take time to implement. It is clear that West Yorkshire Combined Authority through City Connect is gradually implementing a programme of measures to increase the infrastructure for cycling but there is a lack of urgency in the draft AQMA plan. We need to see continued increase in the proportion of trips made by walking and cycling and by public transport. Similarly we need to accelerate the adoption of ultra low carbon vehicles and the measures employed to date have not resulted in significant take up. Nationally the conditions are not all favourable to reducing pollution from motor vehicles and many of the trends are in the wrong direction. Use of the bus is declining; costs of public transport continued to increase faster than the cost of

motoring; new petrol and diesel cars sold in 2018 had higher emission ratings than in 2017. These trends illustrate how the government has failed to create conditions for a growth in walking, cycling and public transport use - making even more important that local authorities take decisive action using the powers available to them.

### 2. Clean Air Zones (CAZ)

We would like to see a more detailed analysis of the use of Clean Air Zones (CAZ) in the AQAP, even if initially it is established as an *Advisory CAZ*. We believe that the introduction of a large zone in Leeds from spring 2020 will make this proposal increasingly relevant to promote clean air in Kirklees. We also propose the use of **no idling** bans in streets close to school gates. Initially this could be established at the most polluted of Kirklees schools to demonstrate how to enforce such a ban. Traffic idling is already illegal on public roads. We recommend that the Council communicates this and enforces it through traffic wardens.

### 3. Modal shift

There is a need to measure progress in achieving modal shift on all local journeys as part of setting long term targets. Our aim should be to expand cycling and walking and use of public transport and reduce the number of trips by private car. The adoption of targets for 2024 and 2029 would help to demonstrate progress.

### 4. Cycling and walking

We want to see more recognition of **cycling as a transport mode**, particularly in the flatter areas (e.g. into Huddersfield from valleys, using new “quiet routes” alongside A629 to Lindley and links into town from Dewsbury, Mirfield and Brighouse using routes that parallel the Leeds Road/Huddersfield Broad canal.) This will require effective links from/to Huddersfield town centre (railway station, civic centre) across or under the

ring road, to integrate the main feeder routes. Delivering an integrated cycling and walking strategy, which builds on the successful greenways, needs to be more clearly shown as a strategic element of the 5-year plan.

We propose a planning requirement (supplementary planning guidance) for developers to fund the **links from new housing to cycling and walking routes**. In planning new housing the cycling, walking and public transport links are often not future proofed. Growth in car ownership in new developments needs can only be arrested by a series of improvements in the alternative travel options.

**More secure cycle storage** for people working or studying or attending events in the major towns is needed to encourage cycle use, particularly ebikes. Parking on street is also now possible for cycles using existing car parking spaces – showing that bikes are also road users and a transport mode.

**Support for schools in developing and implementing travel plans** is no longer available and is increasingly desirable. Kirklees Council needs to partner with voluntary sector organisations to secure funds for promoting cycling, wide use of e-bikes and cycle maintenance in schools from bodies such as UK Cycling.

### 5. Traffic reduction/public transport

By promoting modal integration we can encourage **traffic reduction**. Effective use of bus and rail needs more facilities for multi-modal travel – largely through expanding **park and ride**. In Kirklees this could be achieved by expanding use of rail (which itself

needs key investment decisions made by Network Rail, WYCA and South Yorkshire authorities) and by expanding car parking and secure bike parking at selected railway stations



In particular the potential of the **Penistone Line** to reduce car traffic travelling into Huddersfield has been ignored consistently. Its potential is that much greater if the frequency is increased and the use of P&R made possible.

To increase passenger numbers is a long term objectives as it would require investment in track and rolling stock to permit half hour services. Land would be required at stations for increased parking (e.g. at Honley) as has been regularly demonstrated by the Huddersfield, Pensitone and Sheffield Rail Users Assoaciation (HPSRUA) There is also a need for expanded services on trains on the Transpennine

stations in Kirklees (e.g to allow more cycles to be carried).

### **6. Cleaner vehicles**

The plan lacks a comprehensive strategy to encourage mainstream adoption of ultra low emission vehicles (ULEVs). A future plan for **recharging points** is not spelt out. Kirklees Council adoption of EVs is welcome but we need to encourage **fleet users to work together to adopt** more use of ULEVs by other fleet users (e.g. NHS Trusts, University of Huddersfield, private sector operators).

Given the effect of motorway traffic on air quality it is noticeable that support for the AQMA has not been offered by Highways England.

**The free car parking** concession for ULEVs on streets and sites managed by Kirklees Council needs effective promotion to encourage more people to switch to fully electric.

**Local householders without parking on site** cannot charge at home. We would like to see proposals to support such households to switch to ULEVs through the use of on-street recharging (e.g. through lighting columns).

**All taxi and PH vehicles** need to be cleaner by 2023 and progressively improved. Use of diesel vehicles as taxis and private hire should be phased out by 2025. A progressive policy of reducing fees for ULEVs and raising them for polluting diesels would assist this policy. In addition the taxi owners will need help from the licensing authority in promoting the business case for hybrids and ULEVs (as undertaken by Leeds City Council).

### **7. Adopting the plan**

**The monitoring of AQ in all Kirklees Council policy decision** needs urgent adoption at committee level along with **Climate Emergency**. The AQAP does not yet acknowledge the implications of the climate emergency stance of Kirklees and WYCA.

## **Response A10**

**Did you find the document clear to understand?:** Yes, the charts were very enlightening. I will be unable to comment upon a lot of the areas as I know nothing of them.

**What are your thoughts on the targets set out within the document?:** Any death associated to pollution is unacceptable. Outside of the cities, Kirklees falls around the median. If Kirklees intends to achieve these targets as they stand today, they should not throw petrol on the fire and make them any worse than they currently are

**What are your thoughts on the actions presented within the table?:** I see no point in employing a person to be responsible, if the current Council plans are to create an environment whereby the problem is just shifted elsewhere.

**Are there any areas/specific projects you feel have not been covered as part of the plan?:** Yes, these should be areas where the pollution maybe only of a temporary nature ie. Where high levels are concentrated at a time when vulnerable members of the public would be gathering. There are no plans for improving infrastructure when embarking on increasing density where traffic is a major issue. Improved roads in certain areas would disperse current traffic levels thereby reducing the queuing of traffic. Continuous expansion without improvements will only fuel future problems as you concentrate on those mentioned in the report. Electric cars are sadly a fair way off being the norm. If everyone took an electric car there would be insufficient power available to power them and its unlikely to be for many years to come.

#### Response A11

**Did you find the document clear to understand?:** Not really. I had a sense that it was an overload of information and data which was not all necessary in specifying ACTIONS i.e. the focus of an Action Plan

**What are your thoughts on the targets set out within the document?:** Of the 100+ actions in the **Air Quality Action Plan Measures** table, very few had measurable targets

**What are your thoughts on the actions presented within the table?:** Overall, I think them to be laudable ambitions, but unrealistic in the context of resource constraints within the Council depts. For example, some 42 out of the 100+ actions are either still at business case stage (13) or only identified as a potential future project (29).

In my view it is better to concentrate on those projects which have the greatest potential to improve air quality and reduce CO2 emissions rather than listing everything the Council would like to do, regardless of resource constraints.

**Are there any areas/specific projects you feel have not been covered as part of the plan?:** Yes. This action plan is not framed in the context of the current Climate Emergency, despite the Council having declared its own emergency in January this year. I think it needs to be more aspirational and radical in terms of CO2 reduction and that means acting in whatever ways it can to drastically reduce diesel and petrol fuelled transport. As a cyclist, it seems to me that actions on pedestrianisation such as AQMA 9.6, will only prove fruitful if the Council addresses safe cycle routes into the town centre crossing the ring road. The dangers of the ring road are the single biggest deterrent to cycling into the town centre as an alternative to driving

**Are there any other comments you wish to make relating to Air Quality or this Action plan?:** I acknowledge that due to austerity driven cuts by central government, the Council's resources are depleted for tackling the the climate emergency and

delivering a strong AQAP. My suggestions are: 1) Inform the public of Kirklees about the seriousness of the Climate Emergency (in line with the Motion passed on 16 Jan 2019) - this will help to engage us in actions we can take for ourselves. An emergency needs to feel like an emergency. 2) Seek greater collaboration from willing partners outside the Council, such as the University departments, the Cycling Campaign, the Climate Emergency Group, Friends of the Earth, the Civic Society, etc - many of whom can help with projects, measurement, communications etc.

### **Response A12**

#### **General comment about the scope of the AQAP**

As a long-standing resident of Kirklees and non-expert but strong supporter of promoting improvement in air quality, I welcome the new action plan within which there is much to be commended. However, though I recognise the legal constraints on the Local Authority in its powers to innovate and also the severe financial pressures it is under in endeavouring to carry out its statutory and non-statutory duties, I am not convinced that the visioning of the LA's proposals is ambitious enough to create the necessary step-wise change in the culture of our towns and communities, one for example that might substantially increase awareness and ownership of and precipitate constructive responses to the air pollution problem: one that may result in substantial road and pavement infrastructure change to realistically facilitate people choosing to cycle and/ or walk knowing that it will be a safe and not an unhealthy experience; one that might enable car drivers to recognise that they too are not free from exposure to air pollution and that there are actions they and others should take to mitigate this; one that enables local communities and schools to be aware of the pollution hot spots within their midst and to help monitor this and promote solutions; moreover, one that could put Kirklees on the map as an innovative authority in this matter, as a leading example to others with regards to what can be achieved.

#### **Community involvement**

Despite the magnitude of the challenge, the fact that very many of us daily are exposed to excessive exposure to high levels of air pollution and that this constitutes a serious threat to long term and even current health goes largely unrecognised by a wide section of the community. I believe that the strategy and consequent actions of an AQAP should be more wide ranging in involving a higher level of public health engagement and education through schools, churches and mosques, and voluntary organisations and local business with LA reports of actions undertaken and progress, presented in person to such groups.

#### **Setting out of LAQMA's**

The establishment of LAQMA's in response to identified primary and major sources of air pollution as priority areas is perfectly understandable. However, as important as this is, it appears to me that the plan appears to have little to say or to offer in identifying more disseminated hot spots and for possible actions to respond to such

outside of these areas. The need for ameliorative action within the LAQMA's takes into account the presence of occupied housing within those areas and rightly prioritises actions in relation to the likely exposure of occupants to excessive levels of pollution even though, mostly, only relatively few residences are affected. It is my understanding, however, that these priority areas have been defined by Air Quality Objectives based on an annualised NO<sub>2</sub> index and (DEFRA/EU) threshold. If one were to apply the hourly threshold of 200 micro grams per M cubed it would be my guess that many thousands of household and/ or individuals would be exposed to levels in excess of this with exceedences in their exposure "more than 18 times per year", thus placing them at clear risk of experiencing "harmful" levels of air pollution. To my knowledge, little or no data or action has been presented in the plan to address this distinct possibility.

In line with the Local Authority's Corporate Plan's first priority that "children (should) have the best start in life", it would be eminently sensible to make a priority of monitoring and facilitating pollution level change within the immediate areas involving children's' ingress and egress to and from school. To this end School management teams and governors should be included as active partners with the LA and bolder solutions to the problem should be envisaged.

### **Traffic idling**

Idling of cars and other vehicles is a significant contributor to single and repeated exposure of the public to above threshold levels of pollution. The LA should seek to ensure together with the police, stronger reinforcement of Rule 123 of the Highway Code. Initiatives with publicity and legal enforcement within school zones should be a priority but the LA should also seek to highlight this issue in the context of its broader air quality improvement publicity and campaigning within the multiple organisations including churches and mosques who themselves can be asked to identify policies and champions to sustain pro-air quality behaviour. The same should be extended to owners of private car parks, including supermarkets.

### **Solid fuel and wood burning stoves**

The proposed measure and indicator (G.38: reduction in PM & number of complaints of smoking chimney complaints) in relation to regulatory requirements of the Clean Air Act would seem rather minimalist. There has been an exponential growth in wood burning in the last 10 years. UK government survey data led to official pollution emission levels being revised to say that wood burning was producing 2.6 times more particle emissions than exhausts (this includes people who are burning wood in open fire places but also households with wood burning stoves. This, unfortunately, reintroduces some of the pollution problems that were successfully dealt with under

the clean air act. Wood burning can frequently cause local air pollution problems that expose near neighbours to, in single dose, harmful levels of pollution. Even new stoves are known to omit harmful levels of pollution and the uncontrolled burning of wood with preservative in (CCA) adds a further harmful element. Furthermore, wood-burning is not climate neutral and needs to be discouraged under the Climate Emergency provisions agreed by the LA. These are good reasons for the LA to have some more ambitious actions in nudging people away from wood-burning and to have a more pro-active stance than envisaged to identifying when chimney effluents are non-compliant with legal standards.

### **Cycling and walking health and safety**

The systematic introduction and/ or extension of safe and low pollution cycling routes into and through the town is crucial if significantly more people are going to be induced to see cycling as a viable alternative to the car. The LA needs to do more than pay lip service to this. Infrastructure for safer cycling is mostly lacking and further plans for cycle routes need to ensure that cyclists are not just squeezed in to a notional but unsatisfactory, from the point of view of cyclist safety, cycle lanes. Cycle routes intended to be a serious corridor into the town centre should not be so circuitous as to make their use for commuting too impractical. More secure cycle lock ups at town centre locations are needed. Cycle lane policy and infrastructure developments will need to take into the account the potential for a sizeable increase in hybrid/electric bicycle use.

Pedestrians, equally, should have safer, well maintained walking routes into the town centre without having to endure substantial parts of their journey exposed to high levels of traffic exhaust fumes. Both these and cycle lanes should incorporate clear signage to highlight the route and to warn motorists against parking on the pavement or cycle way, which currently is so hugely under-policed that it has become the norm rather than the exception. More pedestrian crossings are required in key places on some of the principle routes into town as are additional central refuges on the busiest of roads. Pedestrian light controlled crossings on the ring road and other dual carriageways, should not capture users in the central reservation but grant their right of way in a single crossing.

### **Traffic speed in suburban areas**

Proper consideration needs to be given to the adjunctive value of the roll out of a “20’s plenty” policy, which has been substantially achieved in neighbouring Calderdale and Leeds authorities. This, if seriously pursued, can lead to reduced and safer conditions for cyclist and pedestrians and greater awareness by the motorist of the rights and needs of these other street and road users. Research (\*\*) would suggest that, in general, it is incorrect to state that a 20mph speed restriction will lead to greater pollutant emissions for vehicles.

\* Abstracted from chapter 11 in: “The Invisible Killer”, 2018, Melville House U.K.j

\*\* An evaluation of the estimated impacts on vehicle emissions of a 20mph speed restriction in central London, Transport and Environmental Analysis Group, Centre for Transport Studies, Imperial College London, FINAL REPORT, April 2013.

<https://www.cityoflondon.gov.uk/business/environmental-health/environmental-protection/air-quality/Documents/speed-restriction-air-quality-report-2013-for-web.pdf>

### Response A13

**Did you find the document clear to understand?:** Yes

**What are your thoughts on the targets set out within the document?:** Focus too heavily on changing transport habits; changing from cars to buses, petrol/diesel to electric, getting people to cycle.

**What are your thoughts on the actions presented within the table?:** Ok as far as they go and within the targets highlighted.

**Are there any areas/specific projects you feel have not been covered as part of the plan?:** Planting trees. Focus on areas around schools to ensure pupils not breathing polluted air. Tree planting on school grounds. Congestion in areas of high population, reducing standing traffic. Footpaths and cycleways away from traffic rather than alongside.

**Are there any other comments you wish to make relating to Air Quality or this Action plan?:** If you want to encourage people to leave cars behind and use public transport you need better parking and park and ride schemes

### Response A14

**Did you find the document clear to understand?:** Lengthy

**What are your thoughts on the targets set out within the document?:**  
Unambitious

**What are your thoughts on the actions presented within the table?:** Unambitious and lacking the required urgency

**Are there any areas/specific projects you feel have not been covered as part of the plan?:** Raising public awareness of the scandalously poor air quality in our residential areas and its impact on health. lack of education about what individuals can do about this. backed up by a high profile and ambitious cycle/bus/train/walk strategy. consider park and ride for Huddersfield.

**Are there any other comments you wish to make relating to Air Quality or this Action plan?:** Just to say again: not enough energy, urgency or scope.

### Response A15

**Did you find the document clear to understand?:** Yes

**What are your thoughts on the targets set out within the document?:** Kirklees Council need to do more. I understand this is a fluid document. There should be a plan for Batley and Dewsbury Town Centres. A plan to deal with traffic at the bottom of Halifax Road, Heckmondwike especially the queues caused when Heckmondwike Grammar School finishes for the day.

**What are your thoughts on the actions presented within the table?:** Difficult to have an opinion at this stage.

**Are there any areas/specific projects you feel have not been covered as part of the plan?:** Batley Town Centre and the traffic problems (air pollution levels) caused by the school run.

**Are there any other comments you wish to make relating to Air Quality or this Action plan?:**

#### Response A16

**Did you find the document clear to understand?:** No

**What are your thoughts on the targets set out within the document?:** I don't think you will achieve anything near what is necessary for better roads and public transport.

**What are your thoughts on the actions presented within the table?:**

**Are there any areas/specific projects you feel have not been covered as part of the plan?:** Non of the Waterways have been explored as a great alternative highway including the towpath links to residential areas and villages/towns and is environmentally friendly. They can be linked with other routes but must be maintained correctly.

**Are there any other comments you wish to make relating to Air Quality or this Action plan?:** I don't get most of what is trying to be done and im not your average resident but an ex TRA rep.

#### Response A17

**Did you find the document clear to understand?:** No. But it is a technical document with a lot of data. It requires careful reading

**What are your thoughts on the targets set out within the document?:** The targets feel very modest and not sufficiently ambitious

**What are your thoughts on the actions presented within the table?:** The emphasis is too much about increasing the flow of traffic and not enough about reducing volumes of traffic by improving the use that is made of alternatives such as public transport, particularly buses. There is too much about tiny schemes within the local authority aimed specifically at council employees such as bike-sharing schemes. Why include these? To pad out the table? To give the impression of taking action? The table accords equal weight to everything. It would be more helpful if the table identified the Top Ten actions according to impact on improving air quality.

**Are there any areas/specific projects you feel have not been covered as part of the plan?:** The high cost of using local public transport, especially buses, is not addressed. The cost of using a bus has risen far beyond the RPI and the use of buses has fallen. It is a dis-incentive to using buses and encourages more car drivers on local roads.

**AQMA 6 – Edgerton What are your thoughts on the actions presented within the table?:** The proposal emphasises the desire to 'improve the flow of traffic'. Road improvement schemes elsewhere in the UK and abroad have demonstrated that if

this is achieved it is simply a short-term gain. Once drivers realise that the flow has improved then more will start to use the road and it becomes congested once again. This isn't addressed in the proposals although it is a well known tendency.

**AQMA 6 – Edgerton Are there any areas/specific projects you feel have not been covered as part of the plan?:** There is nothing in the Kirklees proposals to stop vehicles leaving the A629 when it is busy and using the local residential roads as rat-runs. This already happens. By contrast, Calderdale has made all residential roads 20mph. Why doesn't Kirklees do the same? Failing to put measures in place to prevent vehicles looking for short-cuts on residential roads leads to worse air quality on residential streets.

**Are there any other comments you wish to make relating to Air Quality or this Action plan?:** The Council could do far more to engage with local people on this subject. I recently visited Norwich. The local authority there uses display boards in the city to inform people about air pollution and the measures it is taking. The equipment used to monitor air pollution is made highly visible and is accompanied with information about why it is being deployed. So rather than being a 'dirty secret' that is hidden away the issue is brought more into the open and acknowledged. Walking around Norwich one is left with the impression that there is a problem with air pollution but that something is being done and the local authority is open and honest about it.

### Response A18

**Did you find the document clear to understand?:** It was OK

**What are your thoughts on the targets set out within the document?:** Good but Kirklees still accepting new builds housing in areas of very high air pollution from traffic congestion. Increasing pollution so making air pollution worse

**What are your thoughts on the actions presented within the table?:** Kirklees not putting into practice as agreeing to new house residential developments in high pollution and over congested areas ie Merchants fields Hunsworth Cleckheaton  
**Are there any areas/specific projects you feel have not been covered as part of the plan?:**No.

**AQMA 4 – Birkenshaw What are your thoughts on the actions presented within the table?:** Birkenshaw high pollution due to traffic congestion but yet new building developments agreed to make it worse going into Hunsworth



**Are there any other comments you wish to make relating to Air Quality or this Action plan?:** It's not achievable by approving new residential housing developments in already congested and high polluted areas. Agreeing to build on green belt when this helps to clean the air. New plans to build on merchants fields will impact on more pollution from over congested roads already

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**Appendix B - Reasons for Not Pursuing Action Plan Measures**

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

## Kirklees Council District Action Plan

<b>Action category</b>	<b>Action description</b>	<b>Reason action is not being pursued (including Stakeholder views)</b>
Other	Charging Clean Air Zone	There is no mandatory requirement to do so. High infrastructure costs. Could adversely affect local economy, as well as potentially displacing the problem to other areas.

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Appendix C – Source Apportionment

Table C.1 AQMA 1 Bradley Source Apportionment

Source Name	All LDVs (%)	All HDVs (%)	Petrol Cars (%)	Diesel Cars (%)	Petrol LGVs (%)	Diesel LGVs (%)	Rigid HGVs (%)	Artic HGVs (%)	Buses/Coaches (%)	Hybrid Buses (%)	Motorcycles (%)	Full Hybrid Petrol Cars (%)	Plug-In Hybrid Petrol Cars (%)	Full Hybrid Diesel Cars (%)
AQMA 1 Leeds Road	63%	37%	5.2%	32.5%	0.1%	24.4%	13.6%	3.0%	20.6%	0.2%	0.3%	0.1%	0.0%	0.1%
AQMA 1 Bradley Road	80%	20%	6.6%	41.1%	0.1%	31.8%	7.2%	1.5%	10.9%	0.1%	0.4%	0.1%	0.0%	0.1%
AQMA 1 B6118	93%	7%	7.7%	49.5%	0.1%	34.8%	2.6%	0.6%	4.0%	0.0%	0.4%	0.1%	0.0%	0.1%
AQMA 1 A62	67%	33%	5.5%	34.5%	0.1%	26.0%	12.1%	2.7%	18.4%	0.1%	0.3%	0.1%	0.0%	0.1%
AQMA 1 A644	55%	45%	4.6%	29.4%	0.1%	20.7%	16.2%	3.7%	24.8%	0.2%	0.2%	0.1%	0.0%	0.1%
AQMA 1 Average	66%	34%	5%	34%	0%	26%	12%	3%	19%	0.1%	0.3%	0.1%	0.0%	0.1%

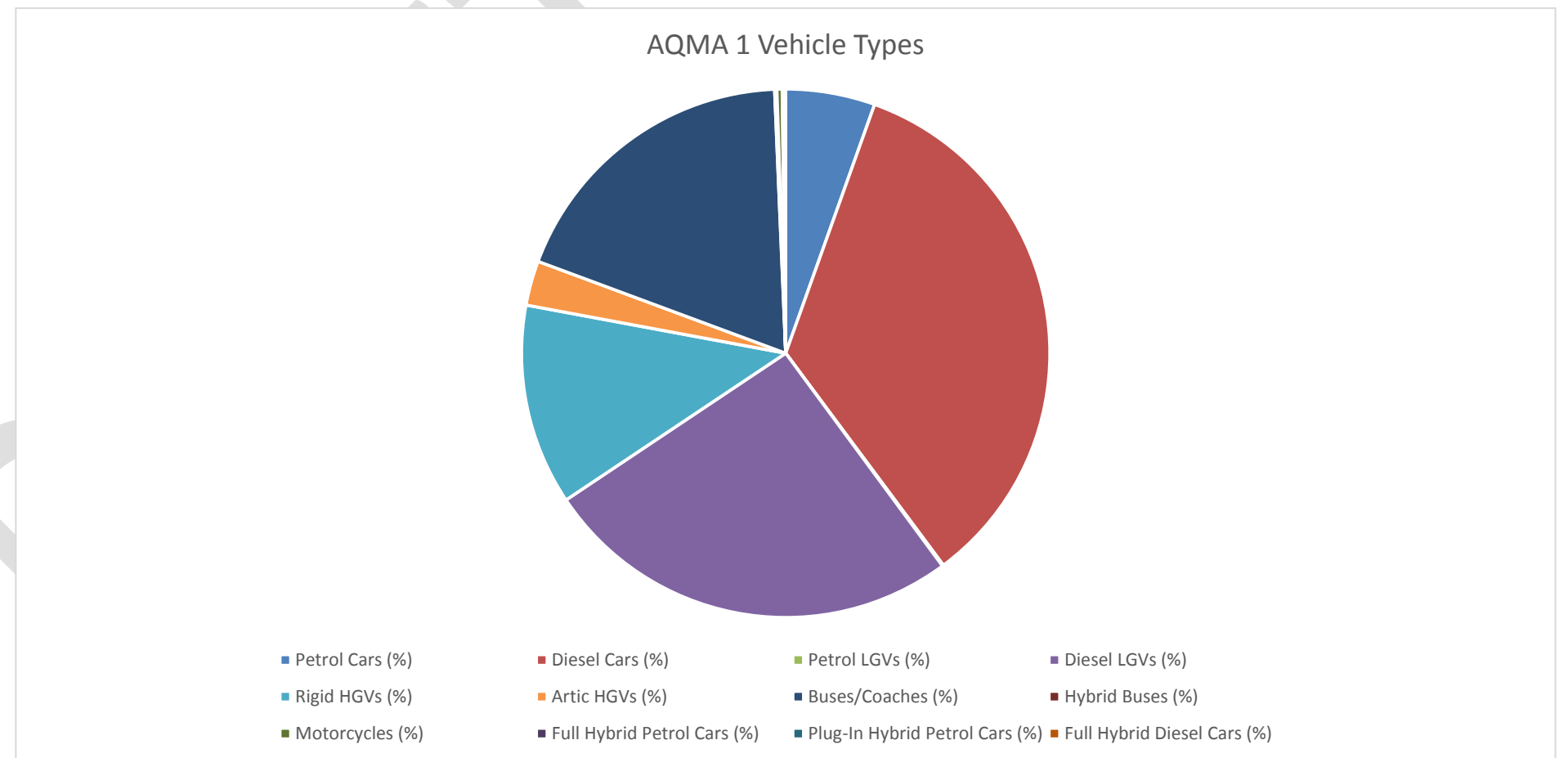
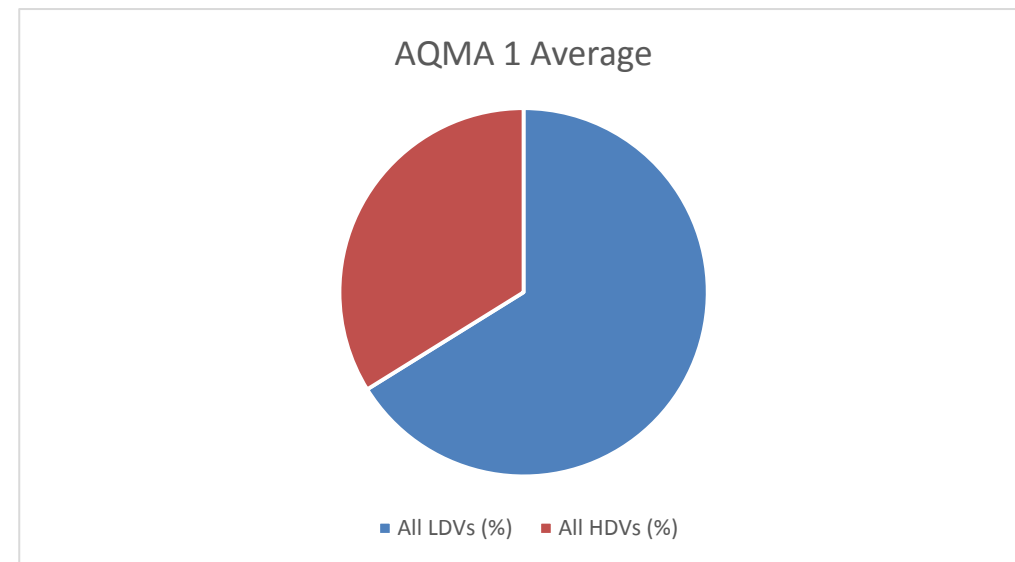


Table C.2 AQMA 3 – Ainley Top Source Apportionment

Source Name	All LDVs (%)	All HDVs (%)	Petrol Cars (%)	Diesel Cars (%)	Petrol LGVs (%)	Diesel LGVs (%)	Rigid HGVs (%)	Artic HGVs (%)	Buses/Coaches (%)	Hybrid Buses (%)	Motorcycles (%)	Full Hybrid Petrol Cars (%)	Plug-In Hybrid Petrol Cars (%)	Full Hybrid Diesel Cars (%)
AQMA 3 - M62 East	75.7%	24.3%	2.8%	40.5%	0.1%	31.9%	9.3%	13.6%	1.3%	0.0%	0.2%	0.1%	0.0%	0.1%
AQMA 3 - M62 West	71.9%	28.1%	2.6%	38.5%	0.1%	30.3%	10.8%	15.8%	1.5%	0.0%	0.2%	0.1%	0.0%	0.1%
AQMA 3 - M62 East Slip	69.4%	30.6%	2.8%	38.1%	0.1%	28.1%	11.7%	17.1%	1.7%	0.0%	0.2%	0.1%	0.0%	0.1%
AQMA 3 - West Slip Road	88.0%	12.0%	3.5%	48.3%	0.1%	35.6%	4.6%	6.7%	0.7%	0.0%	0.2%	0.1%	0.0%	0.1%
AQMA 3 - Halifax Road South	69.7%	30.3%	5.8%	36.9%	0.1%	26.5%	11.0%	2.5%	16.7%	0.1%	0.3%	0.1%	0.0%	0.1%
AQMA 3 - Halifax Road North	69.7%	30.3%	5.8%	36.9%	0.1%	26.5%	11.0%	2.5%	16.7%	0.1%	0.3%	0.1%	0.0%	0.1%
AQMA 3 - Lindley Moor Road East	90.5%	9.5%	7.2%	44.9%	0.1%	37.4%	3.4%	0.7%	5.3%	0.0%	0.6%	0.1%	0.0%	0.1%
AQMA 3 - Lindley Moor Road West	90.5%	9.5%	7.2%	44.9%	0.1%	37.4%	3.4%	0.7%	5.3%	0.0%	0.6%	0.1%	0.0%	0.1%
AQMA 3 - Brighouse Road East	93.1%	6.9%	7.6%	47.3%	0.1%	37.3%	2.5%	0.5%	3.8%	0.0%	0.5%	0.1%	0.0%	0.1%
AQMA 3 - Brighouse Road West	93.1%	6.9%	7.6%	47.3%	0.1%	37.3%	2.5%	0.5%	3.8%	0.0%	0.5%	0.1%	0.0%	0.1%
AQMA 3 - Average	81%	19%	5%	42%	0%	33%	7%	6%	6%	0%	0%	0.1%	0.0%	0.1%

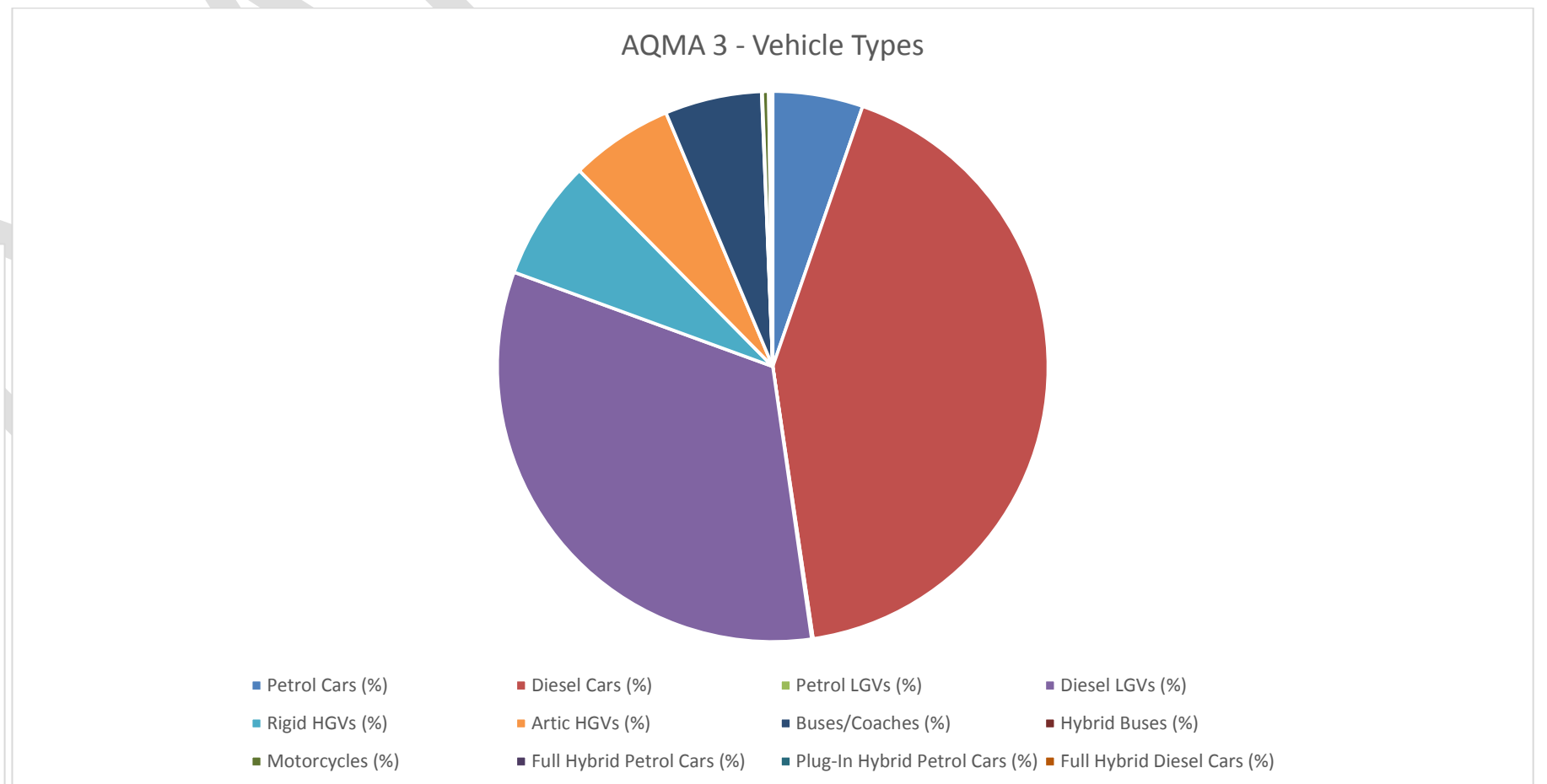
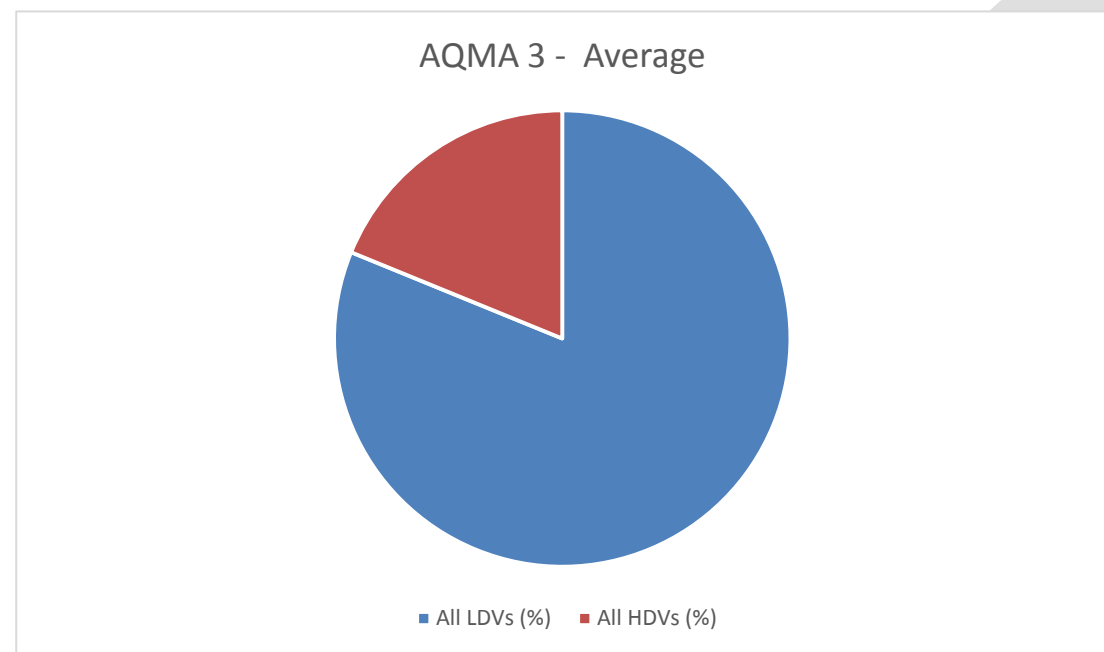


Table C.3 AQMA 4 – Birkenshaw Source Apportionment

Source Name	All LDVs (%)	All HDVs (%)	Petrol Cars (%)	Diesel Cars (%)	Petrol LGVs (%)	Diesel LGVs (%)	Rigid HGVs (%)	Artic HGVs (%)	Buses/Coaches (%)	Hybrid Buses (%)	Motorcycles (%)	Full Hybrid Petrol Cars (%)	Plug-In Hybrid Petrol Cars (%)	Full Hybrid Diesel Cars (%)
AQMA 4 - M62 East	71.2%	28.8%	2.6%	38.1%	0.1%	30.0%	11.1%	16.1%	1.6%	0.0%	0.2%	0.1%	0.0%	0.1%
AQMA 4 - M62 West	71.2%	28.8%	2.6%	38.1%	0.1%	30.0%	11.1%	16.1%	1.6%	0.0%	0.2%	0.1%	0.0%	0.1%
AQMA 4 B-Bradford Road North	73.6%	26.4%	6.1%	39.7%	0.1%	27.2%	9.5%	2.2%	14.6%	0.1%	0.3%	0.1%	0.0%	0.1%
AQMA 4 B-Bradford Road South	76.2%	23.8%	6.3%	41.1%	0.1%	28.2%	8.6%	2.0%	13.1%	0.1%	0.3%	0.1%	0.0%	0.1%
AQMA 4 - Whitehall Road East	73.6%	26.4%	6.1%	39.7%	0.1%	27.2%	9.5%	2.2%	14.6%	0.1%	0.3%	0.1%	0.0%	0.1%
AQMA 4 -Whitehall Road West	62.4%	37.6%	5.2%	33.7%	0.1%	23.1%	13.5%	3.2%	20.7%	0.1%	0.2%	0.1%	0.0%	0.1%
AQMA 4 - Average	71%	29%	5%	38%	0%	28%	11%	7%	11%	0%	0%	0.1%	0.0%	0.1%

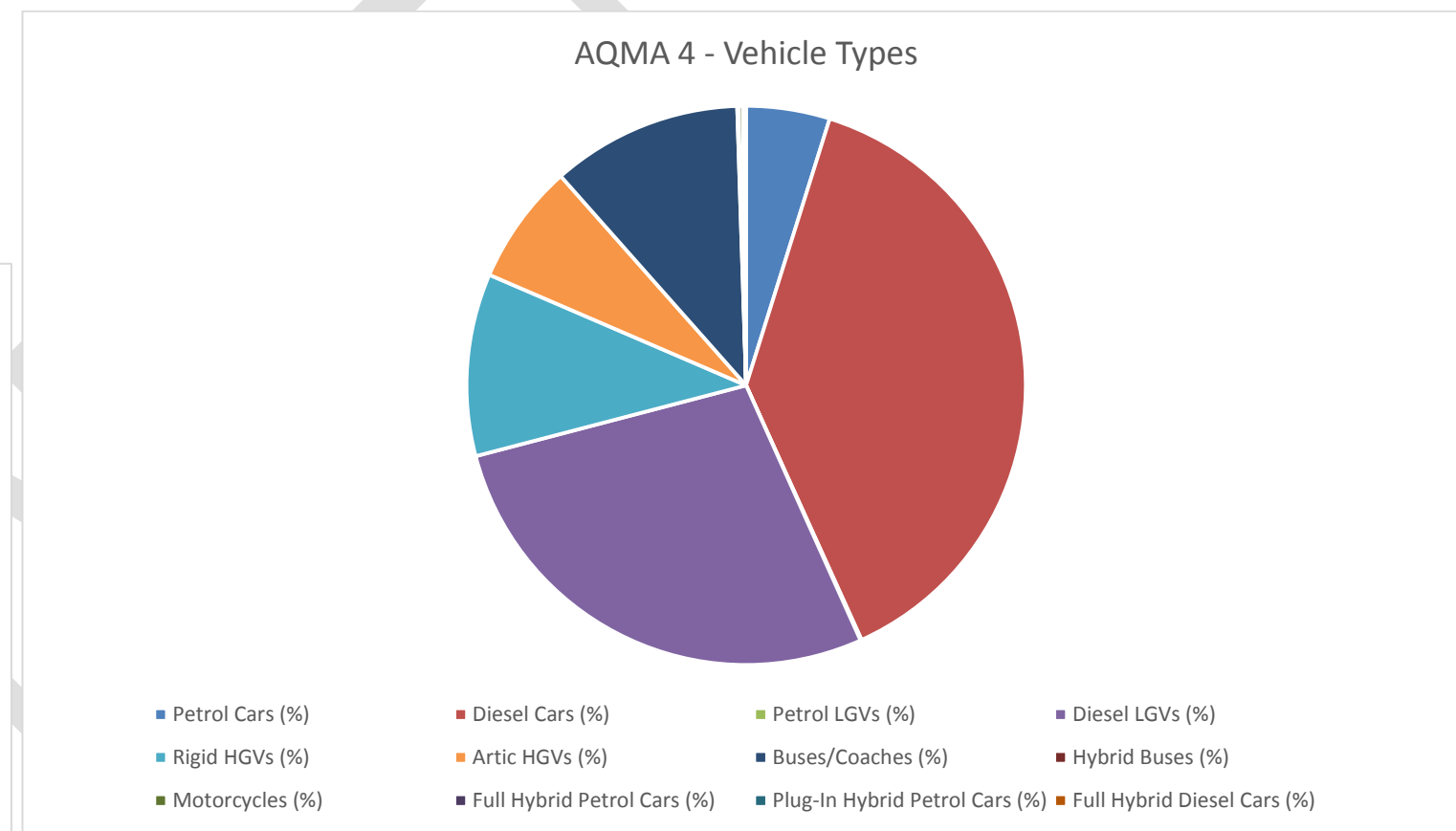
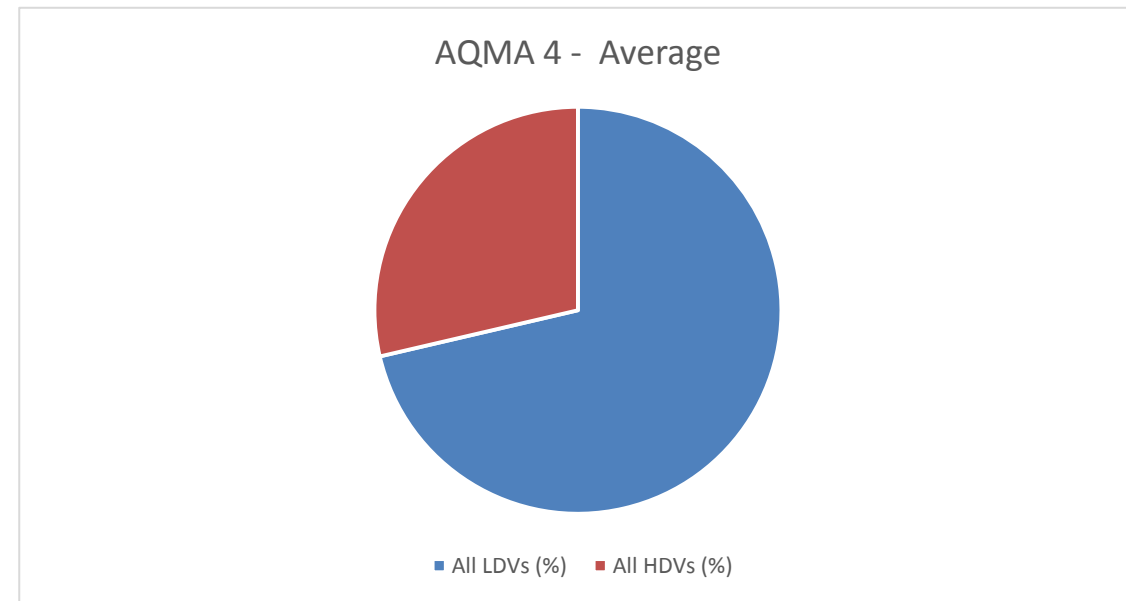


Table C.4 AQMA 5 – Eastborough Source Apportionment

Source Name	All LDVs (%)	All HDVs (%)	Petrol Cars (%)	Diesel Cars (%)	Petrol LGVs (%)	Diesel LGVs (%)	Rigid HGVs (%)	Artic HGVs (%)	Buses/Coaches (%)	Hybrid Buses (%)	Motorcycles (%)	Full Hybrid Petrol Cars (%)	Plug-In Hybrid Petrol Cars (%)	Full Hybrid Diesel Cars (%)
AQMA 5 - Leeds Road	40.2%	59.8%	3.3%	21.5%	0.0%	15.1%	21.6%	5.0%	33.0%	0.2%	0.2%	0.0%	0.0%	0.1%
AQMA 5 - Wakefield Road	44.6%	55.4%	3.7%	23.8%	0.0%	16.8%	20.0%	4.6%	30.5%	0.2%	0.2%	0.0%	0.0%	0.1%
AQMA 5 - Ring Road	44.6%	55.4%	3.7%	23.8%	0.0%	16.8%	20.0%	4.6%	30.5%	0.2%	0.2%	0.0%	0.0%	0.1%
AQMA 5 - Average	43%	57%	4%	23%	0%	16%	21%	5%	31%	0%	0%	0.0%	0.0%	0.1%

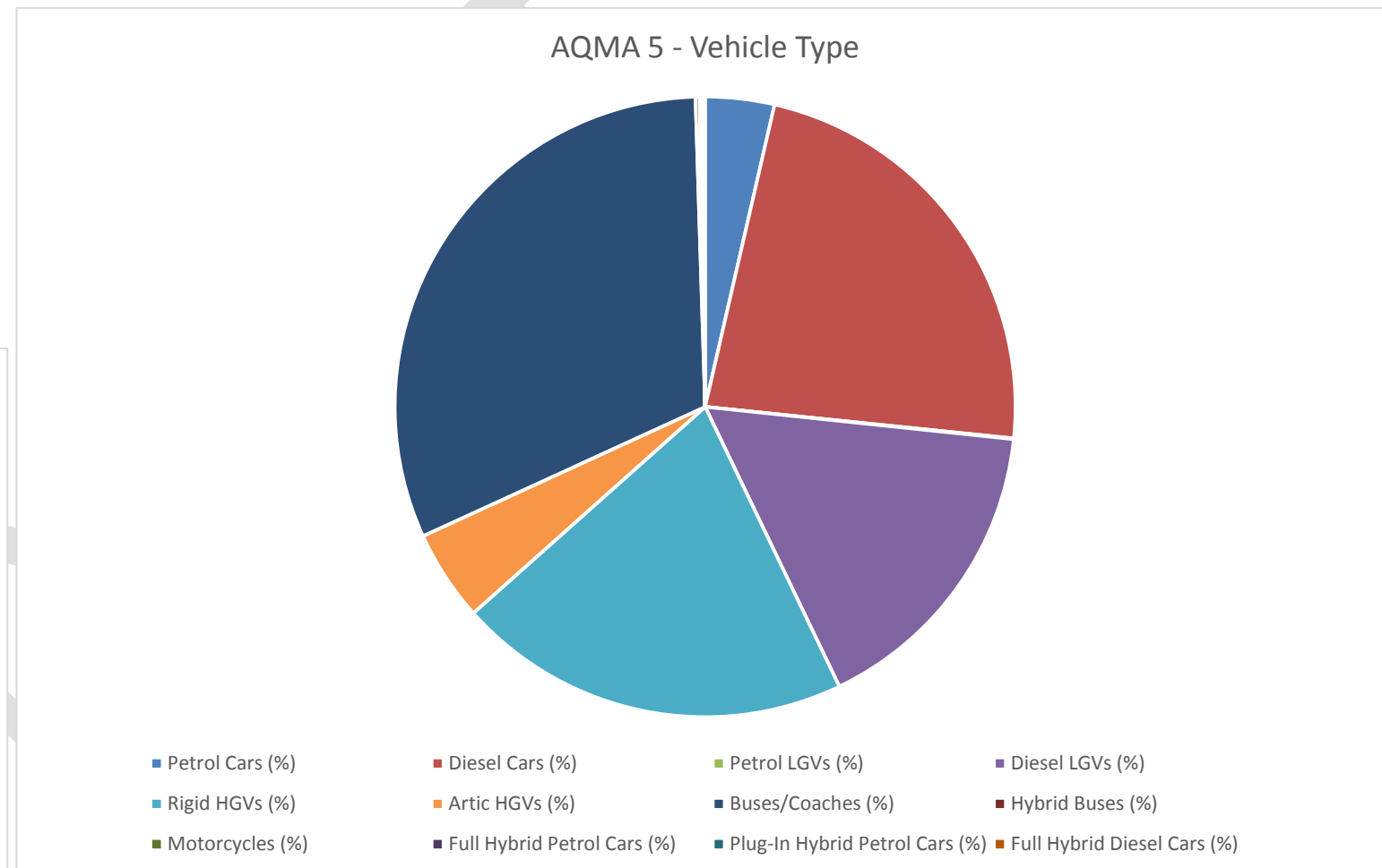
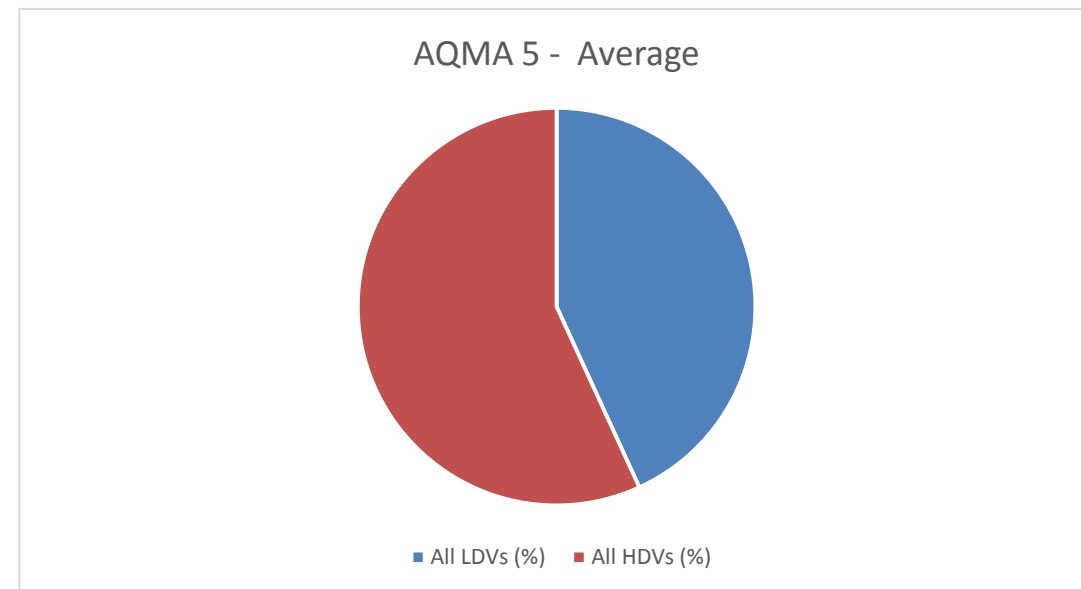


Table C.5 AQMA 6 – Eastborough Source Apportionment

Source Name	All LDVs (%)	All HDVs (%)	Petrol Cars (%)	Diesel Cars (%)	Petrol LGVs (%)	Diesel LGVs (%)	Rigid HGVs (%)	Artic HGVs (%)	Buses/Coaches (%)	Hybrid Buses (%)	Motorcycles (%)	Full Hybrid Petrol Cars (%)	Plug-In Hybrid Petrol Cars (%)	Full Hybrid Diesel Cars (%)
AQMA 6 - Halifax Road	71.2%	28.8%	5.9%	38.0%	0.1%	26.7%	10.4%	2.4%	15.9%	0.1%	0.3%	0.1%	-	0.1%
AQMA 6 - Blacker Road	84.5%	15.5%	7.0%	46.3%	0.1%	30.5%	5.6%	1.4%	8.6%	0.1%	0.3%	0.1%	-	0.1%
AQMA 6 - Edgerton Grove Road	89.3%	10.7%	7.4%	49.0%	0.1%	32.3%	3.8%	0.9%	5.9%	-	0.3%	0.1%	-	0.1%
AQMA 6 - Average	82%	18%	7%	44%	0%	30%	7%	2%	10%	0%	0%	0.1%	0.0%	0.1%

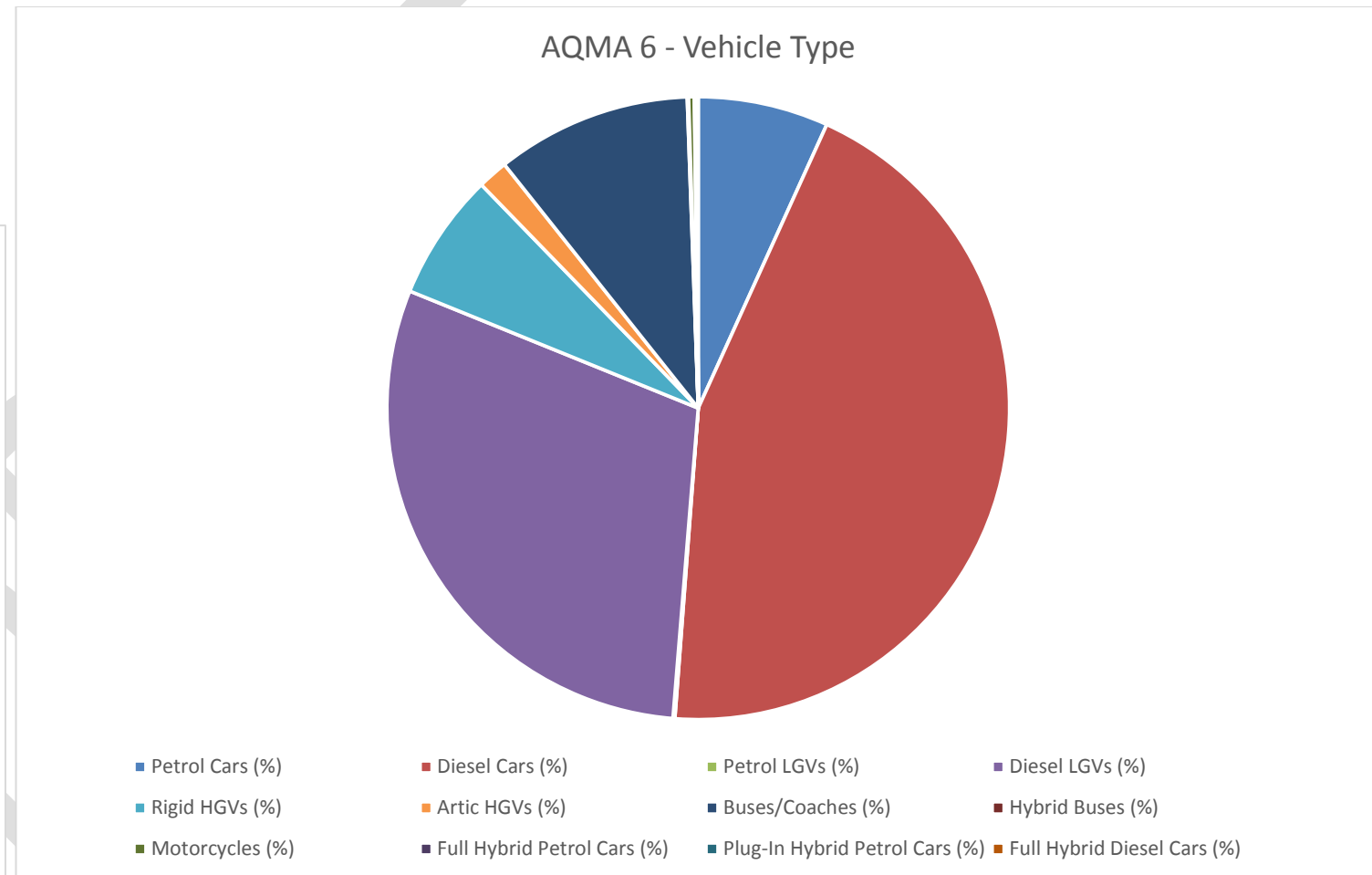
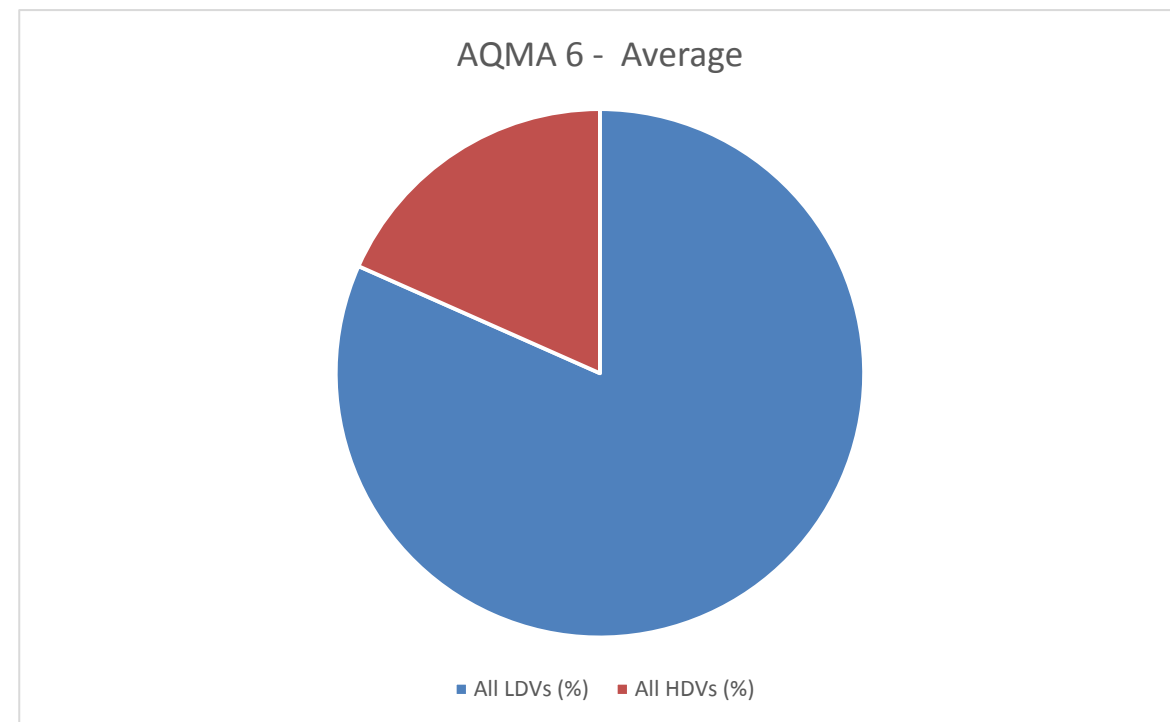


Table C.6 AQMA 7 – Liversedge / Heckmondwike Source Apportionment

Source Name	All LDVs (%)	All HDVs (%)	Petrol Cars (%)	Diesel Cars (%)	Petrol LGVs (%)	Diesel LGVs (%)	Rigid HGVs (%)	Artic HGVs (%)	Buses/Coaches (%)	Hybrid Buses (%)	Motorcycles (%)	Full Hybrid Petrol Cars (%)	Plug-In Hybrid Petrol Cars (%)	Full Hybrid Diesel Cars (%)
AQMA 7 - Leeds Road	88.0%	12.0%	7.3%	47.0%	0.1%	33.1%	4.3%	1.0%	6.6%	-	0.4%	0.1%	-	0.1%
AQMA 7 - Wakefield Road	90.4%	9.6%	7.5%	49.6%	0.1%	32.7%	3.5%	0.8%	5.3%	-	0.3%	0.1%	-	0.1%
AQMA 7 - Bradford Road	76.7%	23.3%	6.4%	40.9%	0.1%	28.8%	8.4%	1.9%	12.9%	0.1%	0.3%	0.1%	-	0.1%
AQMA 7 - Halifax Road	78.8%	21.2%	6.6%	42.0%	0.1%	29.6%	7.7%	1.8%	11.7%	0.1%	0.3%	0.1%	-	0.1%
AQMA 7 - Average	83%	17%	7%	45%	0%	31%	6%	1%	9%	0%	0%	0.1%	0.0%	0.1%

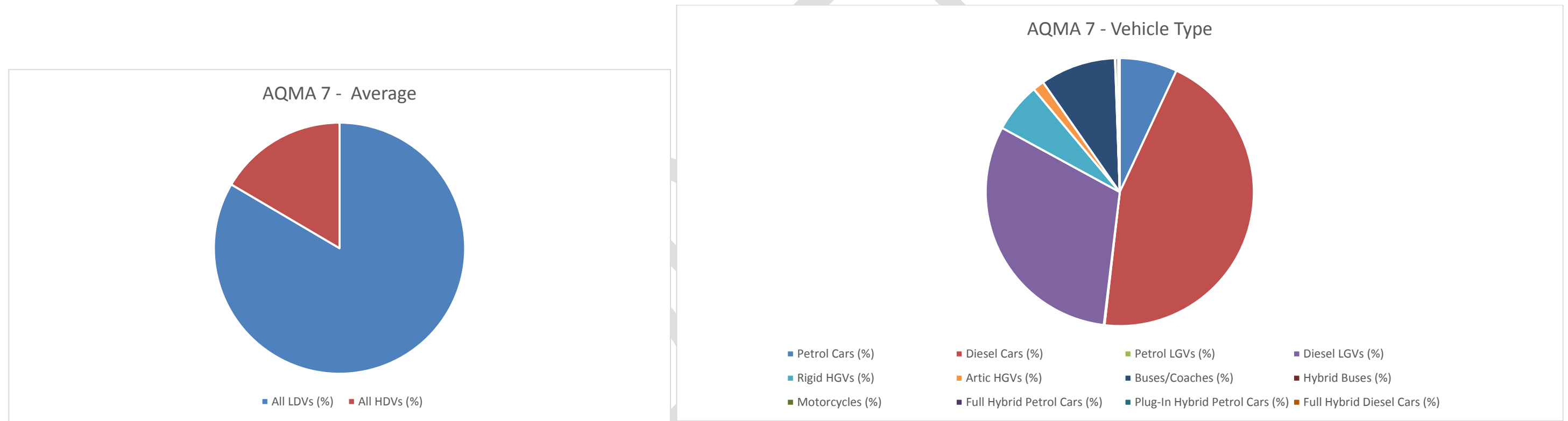




Table C.7 AQMA 8 – Outlane Source Apportionment

Source Name	All LDVs (%)	All HDVs (%)	Petrol Cars (%)	Diesel Cars (%)	Petrol LGVs (%)	Diesel LGVs (%)	Rigid HGVs (%)	Artic HGVs (%)	Buses/Coaches (%)	Hybrid Buses (%)	Motorcycles (%)	Full Hybrid Petrol Cars (%)	Plug-In Hybrid Petrol Cars (%)	Full Hybrid Diesel Cars (%)
AQMA 8 - M62 East	74.4%	25.6%	2.7%	39.7%	0.1%	31.5%	9.9%	14.4%	1.4%	-	0.2%	0.1%	-	0.1%
AQMA 8 - M62 West	74.4%	25.6%	2.7%	39.7%	0.1%	31.5%	9.9%	14.4%	1.4%	-	0.2%	0.1%	-	0.1%
AQMA 8 -Round Ings Road	87.4%	12.6%	7.3%	46.0%	0.1%	33.4%	4.6%	1.0%	6.9%	-	0.4%	0.1%	-	0.1%
AQMA 8 - Average	79%	21%	4%	42%	0%	32%	8%	10%	3%	0%	0%	0.1%	0.0%	0.1%

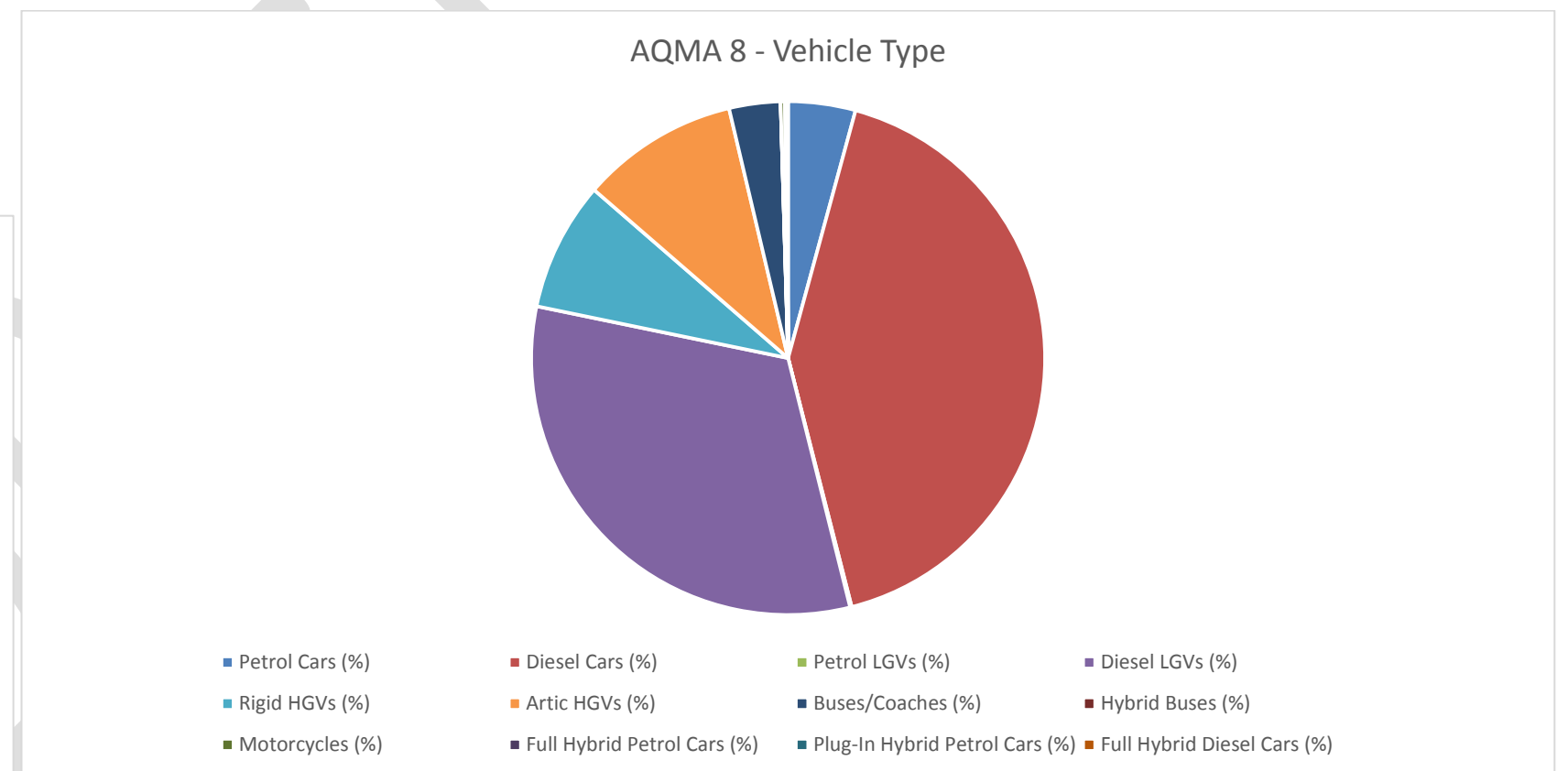
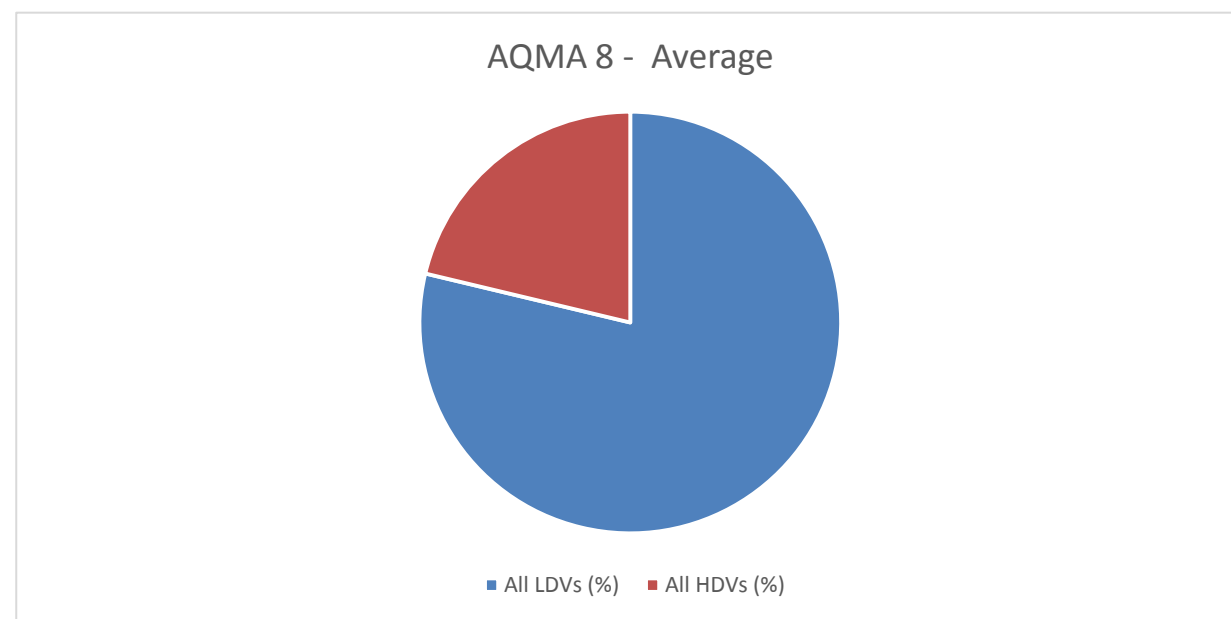


Table C.8 AQMA 9 – Huddersfield Town Centre Source Apportionment

Source Name	All LDVs (%)	All HDVs (%)	Petrol Cars (%)	Diesel Cars (%)	Petrol LGVs (%)	Diesel LGVs (%)	Rigid HGVs (%)	Artic HGVs (%)	Buses/Coaches (%)	Hybrid Buses (%)	Motorcycles (%)	Full Hybrid Petrol Cars (%)	Plug-In Hybrid Petrol Cars (%)	Full Hybrid Diesel Cars (%)
Wakefield Rd EB 1	91.9%	8.1%	7.6%	48.6%	0.1%	34.9%	2.9%	0.7%	4.5%	0.0%	0.4%	0.1%	0.0%	0.1%
Wakefield Rd WB 1	91.9%	8.1%	7.6%	48.6%	0.1%	34.9%	2.9%	0.7%	4.5%	0.0%	0.4%	0.1%	0.0%	0.1%
St Andrews Rd	79.4%	20.6%	6.6%	42.2%	0.1%	29.9%	7.4%	1.7%	11.4%	0.1%	0.3%	0.1%	0.0%	0.1%
Firth St	82.1%	17.9%	6.8%	43.7%	0.1%	30.9%	6.5%	1.5%	9.9%	0.1%	0.3%	0.1%	0.0%	0.1%
Queensgate EB 1	89.5%	10.5%	7.5%	47.6%	0.1%	33.7%	3.8%	0.9%	5.8%	0.0%	0.4%	0.1%	0.0%	0.1%
Queensgate WB 1	89.5%	10.5%	7.5%	47.6%	0.1%	33.7%	3.8%	0.9%	5.8%	0.0%	0.4%	0.1%	0.0%	0.1%
Southgate SB1	89.1%	10.9%	7.4%	47.3%	0.1%	33.7%	3.9%	0.9%	6.0%	0.0%	0.4%	0.1%	0.0%	0.1%
Southgate NB1	89.1%	10.9%	7.4%	47.3%	0.1%	33.7%	3.9%	0.9%	6.0%	0.0%	0.4%	0.1%	0.0%	0.1%
Kingsgate Roundabout	87.9%	12.1%	7.2%	48.9%	0.1%	31.2%	4.3%	1.1%	6.7%	0.0%	0.3%	0.1%	0.0%	0.1%
Kirkgate	10.3%	89.7%	0.9%	5.5%	0.0%	3.8%	32.3%	7.6%	49.5%	0.3%	0.0%	0.0%	0.0%	0.0%
Leeds Rd WB	76.5%	23.5%	6.4%	40.5%	0.1%	29.0%	8.5%	1.9%	13.0%	0.1%	0.3%	0.1%	0.0%	0.1%
Leeds Rd EB	76.5%	23.5%	6.4%	40.5%	0.1%	29.0%	8.5%	1.9%	13.0%	0.1%	0.3%	0.1%	0.0%	0.1%
Northumberland St	90.8%	9.2%	7.6%	48.0%	0.1%	34.5%	3.3%	0.8%	5.1%	0.0%	0.4%	0.1%	0.0%	0.1%
Castle/Southgate SB	79.2%	20.8%	6.6%	42.0%	0.1%	30.0%	7.5%	1.7%	11.5%	0.1%	0.3%	0.1%	0.0%	0.1%
Castle/Southgate NB	79.2%	20.8%	6.6%	42.0%	0.1%	30.0%	7.5%	1.7%	11.5%	0.1%	0.3%	0.1%	0.0%	0.1%
Lower Fitzwilliam St	89.4%	10.6%	7.4%	48.3%	0.1%	32.9%	3.8%	0.9%	5.9%	0.0%	0.3%	0.1%	0.0%	0.1%
Castlegate EB	88.6%	11.4%	7.4%	47.0%	0.1%	33.5%	4.1%	0.9%	6.3%	0.0%	0.4%	0.1%	0.0%	0.1%
Castlegate WB	88.6%	11.4%	7.4%	47.0%	0.1%	33.5%	4.1%	0.9%	6.3%	0.0%	0.4%	0.1%	0.0%	0.1%
John William St 1	89.4%	10.6%	7.4%	48.3%	0.1%	32.9%	3.8%	0.9%	5.9%	0.0%	0.3%	0.1%	0.0%	0.1%
Castlegate NB 1	82.0%	18.0%	6.8%	43.4%	0.1%	31.1%	6.5%	1.5%	9.9%	0.1%	0.3%	0.1%	0.0%	0.1%
Castlegate SB 1	82.0%	18.0%	6.8%	43.4%	0.1%	31.1%	6.5%	1.5%	9.9%	0.1%	0.3%	0.1%	0.0%	0.1%
Fitzwilliam St	92.3%	7.7%	7.7%	49.9%	0.1%	34.0%	2.8%	0.7%	4.2%	0.0%	0.3%	0.1%	0.0%	0.1%
Castlegate Slip	88.2%	11.8%	7.3%	46.7%	0.1%	33.5%	4.3%	1.0%	6.5%	0.0%	0.4%	0.1%	0.0%	0.1%
New North Rd Slip	89.7%	10.3%	7.5%	47.5%	0.1%	34.1%	3.7%	0.8%	5.7%	0.0%	0.4%	0.1%	0.0%	0.1%
New North Rd	90.3%	9.7%	7.5%	47.8%	0.1%	34.3%	3.5%	0.8%	5.4%	0.0%	0.4%	0.1%	0.0%	0.1%
Westgate 1	26.6%	73.4%	2.2%	14.1%	0.0%	10.0%	26.6%	6.1%	40.5%	0.3%	0.1%	0.0%	0.0%	0.0%
Railway St	65.6%	34.4%	5.5%	35.5%	0.1%	24.2%	12.4%	2.9%	19.0%	0.1%	0.2%	0.1%	0.0%	0.1%
Trinity St	80.5%	19.5%	6.7%	43.5%	0.1%	29.7%	7.0%	1.7%	10.7%	0.1%	0.3%	0.1%	0.0%	0.1%
Market St 1	41.0%	59.0%	3.4%	22.2%	0.0%	15.1%	21.2%	5.0%	32.5%	0.2%	0.2%	0.0%	0.0%	0.1%
Dundas St	96.7%	3.3%	8.0%	52.3%	0.1%	35.6%	1.2%	0.3%	1.8%	0.0%	0.4%	0.1%	0.0%	0.2%
Bus Station Route	-	100.0%	-	-	-	-	35.3%	9.1%	55.2%	0.4%	-	-	-	-

Source Name	All LDVs (%)	All HDVs (%)	Petrol Cars (%)	Diesel Cars (%)	Petrol LGVs (%)	Diesel LGVs (%)	Rigid HGVs (%)	Artic HGVs (%)	Buses/Coaches (%)	Hybrid Buses (%)	Motorcycles (%)	Full Hybrid Petrol Cars (%)	Plug-In Hybrid Petrol Cars (%)	Full Hybrid Diesel Cars (%)
Manchester Rd NB	70.5%	29.5%	5.8%	39.2%	0.1%	25.0%	10.5%	2.6%	16.3%	0.1%	0.2%	0.1%	0.0%	0.1%
Manchester Rd SB	70.5%	29.5%	5.8%	39.2%	0.1%	25.0%	10.5%	2.6%	16.3%	0.1%	0.2%	0.1%	0.0%	0.1%
Chapel Hill	77.1%	22.9%	6.4%	42.9%	0.1%	27.3%	8.1%	2.0%	12.6%	0.1%	0.2%	0.1%	0.0%	0.1%
Bradford RD NB 1	94.1%	5.9%	7.8%	49.8%	0.1%	35.7%	2.1%	0.5%	3.3%	0.0%	0.4%	0.1%	0.0%	0.1%
Bradford RD SB	88.7%	11.3%	7.4%	46.9%	0.1%	33.7%	4.1%	0.9%	6.2%	0.0%	0.4%	0.1%	0.0%	0.1%
AQMA 9 - Average	79.8%	20.2%	6.6%	42.7%	0.1%	29.9%	7.3%	1.7%	11.1%	0.1%	0.3%	0.1%	0.0%	0.1%

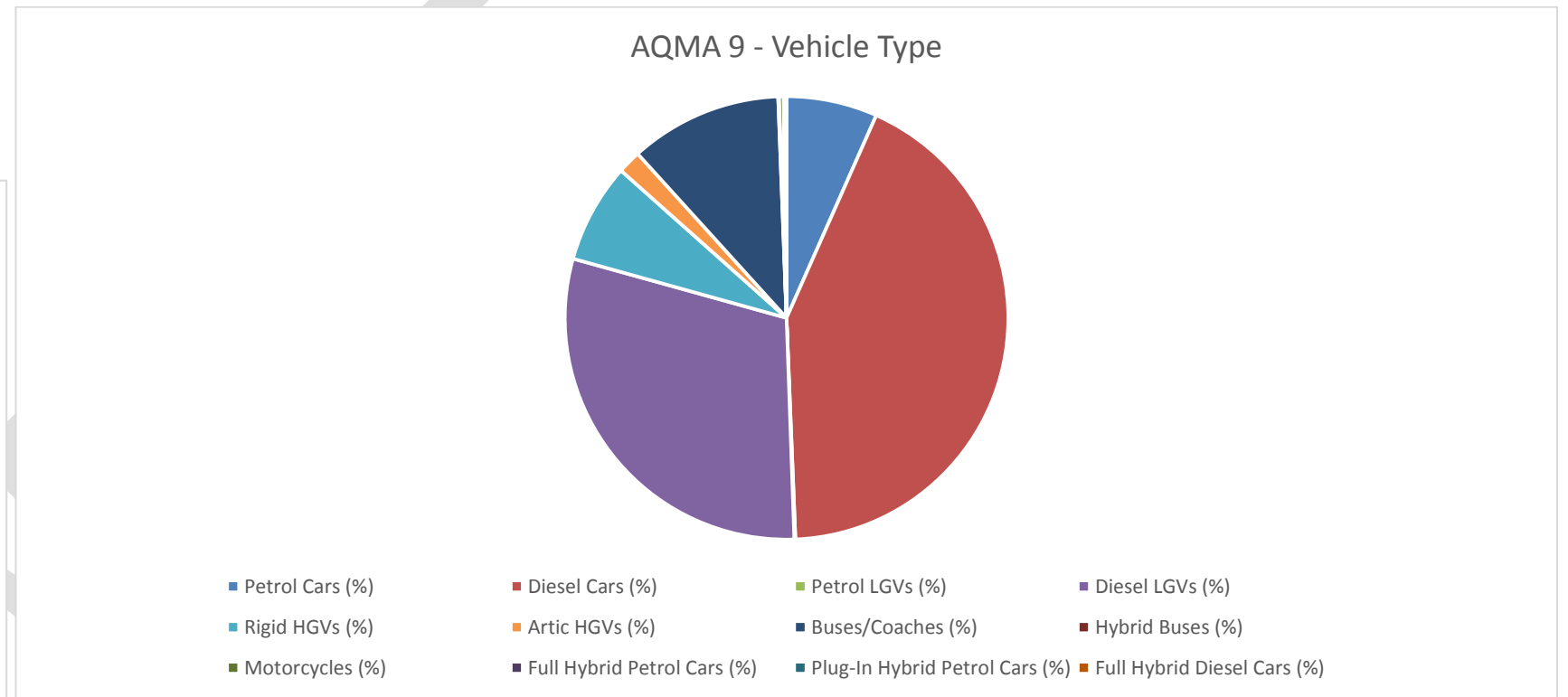
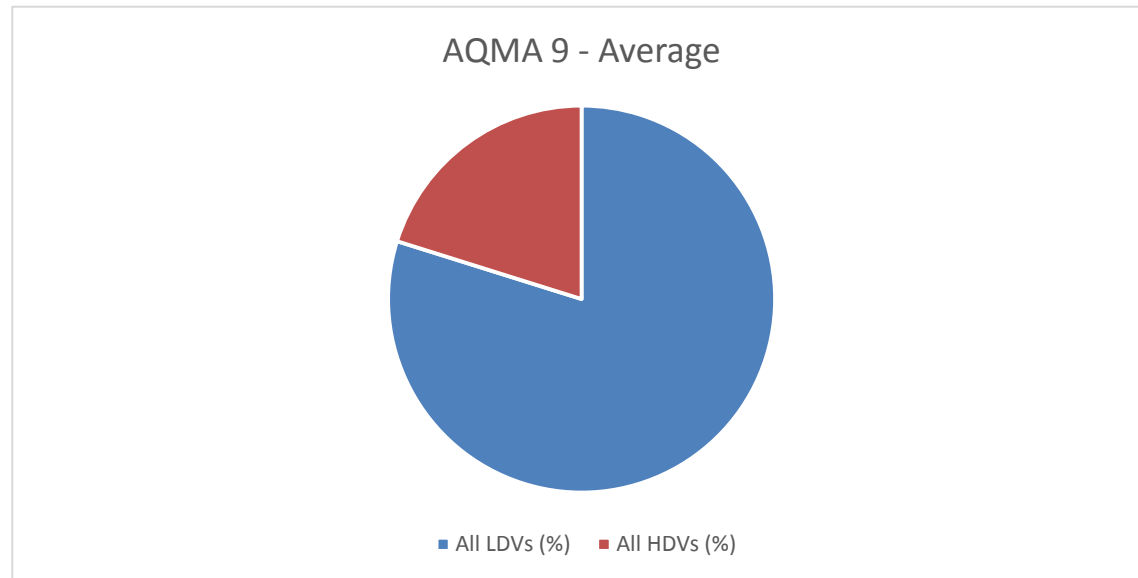


Table C.9 AQMA Emissions Contributions

Source Name	Pollutant Name	All Vehicles (g/km/s)	All LDVs (g/km/s)	All HDVs (g/km/s)
AQMA 1 Leeds Road	NOx	1.14302	0.71624	0.42677
AQMA 1 Bradley Road	NOx	0.03514	0.02820	0.00695
AQMA 1 B6118	NOx	0.00265	0.00246	0.00019
AQMA 1 A62	NOx	0.15341	0.10224	0.05117
AQMA 1 A644	NOx	0.12321	0.06788	0.05533
AQMA 3 - M62 East	NOx	0.31961	0.24195	0.07766
AQMA 3 - M62 West	NOx	0.29122	0.20928	0.08194
AQMA 3 - M62 East Slip	NOx	0.02684	0.01863	0.00821
AQMA 3 - West Slip Road	NOx	0.06672	0.05874	0.00798
AQMA 3 - Halifax Road South	NOx	0.05382	0.03753	0.01629

Source Name	Pollutant Name	All Vehicles (g/km/s)	All LDVs (g/km/s)	All HDVs (g/km/s)
AQMA 3 - Halifax Road North	NOx	0.05382	0.03753	0.01629
AQMA 3 - Lindley Moor Road East	NOx	0.02445	0.02214	0.00231
AQMA 3 - Lindley Moor Road West	NOx	0.02445	0.02213	0.00231
AQMA 3 - Brighouse Road East	NOx	0.02153	0.02004	0.00149
AQMA 3 - Brighouse Road West	NOx	0.02153	0.02004	0.00149
AQMA 4 - M62 East	NOx	0.31392	0.22348	0.09044
AQMA 4 - M62 West	NOx	0.31392	0.22348	0.09044
AQMA 4 B-Bradford Road North	NOx	0.10036	0.07382	0.02654
AQMA 4 B-Bradford Road South	NOx	0.11198	0.08532	0.02665
AQMA 4 - Whitehall Road East	NOx	0.10036	0.07382	0.02654
AQMA 4 -Whitehall Road West	NOx	0.11889	0.07424	0.04465
AQMA 5 - Leeds Road	NOx	0.14380	0.05783	0.08597
AQMA 5 - Wakefield Road	NOx	0.21450	0.09575	0.11875
AQMA 5 - Ring Road	NOx	0.21450	0.09575	0.11875
AQMA 6 - Halifax Road	NOx	0.92131	0.65562	0.26569
AQMA 6 - Blacker Road	NOx	0.05157	0.04356	0.00802
AQMA 6 - Edgerton Grove Road	NOx	0.03659	0.03268	0.00391
AQMA 7 - Leeds Road	NOx	0.21516	0.18941	0.02575
AQMA 7 - Wakefield Road	NOx	0.08435	0.07621	0.00814
AQMA 7 - Bradford Road	NOx	0.18724	0.14353	0.04371
AQMA 7 - Halifax Road	NOx	0.12274	0.09670	0.02604
AQMA 8 - M62 East	NOx	0.97387	0.72410	0.24977
AQMA 8 - M62 West	NOx	0.97387	0.72410	0.24977
AQMA 8 -Round Ings Road	NOx	0.03300	0.02885	0.00414
AQMA 9 Wakefield Rd EB 1	NOx	0.08627	0.07925	0.00702
AQMA 9 Wakefield Rd WB 1	NOx	0.08627	0.07925	0.00702
AQMA 9 St Andrews Rd	NOx	0.08109	0.06440	0.01669
AQMA 9 Firth St	NOx	0.09267	0.07608	0.01659
AQMA 9 Wakefield Rd EB 2	NOx	0.08765	0.08036	0.00729
AQMA 9 Wakefield Rd WB 2	NOx	0.08765	0.08036	0.00729
AQMA 9 Queensgate EB 1	NOx	0.07116	0.06371	0.00746
AQMA 9 Queensgate WB 1	NOx	0.07116	0.06371	0.00746
AQMA 9 Southgate SB1	NOx	0.07618	0.06788	0.00830
AQMA 9 Southgate NB1	NOx	0.07618	0.06788	0.00830
AQMA 9 Kingsgate Roundabout	NOx	0.28156	0.24752	0.03404
AQMA 9 Kirkgate	NOx	0.03829	0.00393	0.03436
AQMA 9 Leeds Rd WB	NOx	0.06387	0.04884	0.01503
AQMA 9 Leeds Rd EB	NOx	0.06387	0.04884	0.01503
AQMA 9 Northumberland St	NOx	0.02596	0.02357	0.00239
AQMA 9 Castle/Southgate SB	NOx	0.04457	0.03528	0.00928
AQMA 9 Castle/Southgate NB	NOx	0.04457	0.03528	0.00928
AQMA 9 Lower Fitzwilliam St	NOx	0.03422	0.03059	0.00364
AQMA 9 Castlegate EB	NOx	0.06803	0.06026	0.00776
AQMA 9 Castlegate WB	NOx	0.06803	0.06026	0.00776
AQMA 9 John William St 1	NOx	0.03090	0.02762	0.00328
AQMA 9 Castlegate NB 1	NOx	0.10645	0.08728	0.01917
AQMA 9 Castlegate SB 1	NOx	0.10645	0.08728	0.01917

Source Name	Pollutant Name	All Vehicles (g/km/s)	All LDVs (g/km/s)	All HDVs (g/km/s)
AQMA 9 Fitzwilliam St	NOx	0.01619	0.01495	0.00125
AQMA 9 Castlegate Slip	NOx	0.03650	0.03219	0.00431
AQMA 9 New North Rd Slip	NOx	0.03510	0.03149	0.00360
AQMA 9 New North Rd	NOx	0.03316	0.02993	0.00323
AQMA 9 Castlegate NB 2	NOx	0.10840	0.08850	0.01990
AQMA 9 Castlegate SB 2	NOx	0.10840	0.08850	0.01990
AQMA 9 Westgate 1	NOx	0.05157	0.01370	0.03787
AQMA 9 Westgate 2	NOx	0.06021	0.02640	0.03381
AQMA 9 John William St 2	NOx	0.02790	0.02509	0.00280
AQMA 9 Railway St	NOx	0.03497	0.02292	0.01204
AQMA 9 Trinity St	NOx	0.07667	0.06173	0.01494
AQMA 9 Castlegate SB 3	NOx	0.07664	0.06559	0.01105
AQMA 9 Castlegate NB 3	NOx	0.07664	0.06559	0.01105
AQMA 9 Market St 1	NOx	0.03992	0.01637	0.02354
AQMA 9 Market St 2	NOx	0.03992	0.01637	0.02354
AQMA 9 Dundas St	NOx	0.00919	0.00888	0.00031
AQMA 9 Bus Station Route	NOx	0.07461	-	0.07461
AQMA 9 Manchester Rd NB	NOx	0.02744	0.01934	0.00810
AQMA 9 Manchester Rd SB	NOx	0.02744	0.01934	0.00810
AQMA 9 Chapel Hill	NOx	0.08959	0.06907	0.02051
AQMA 9 Bradford RD NB 1	NOx	0.01367	0.01286	0.00081
AQMA 9 Bradford RD NB 2	NOx	0.01495	0.01407	0.00089
AQMA 9 Bradford RD NB 3	NOx	0.03005	0.02666	0.00340
AQMA 9 Bradford RD SB	NOx	0.03095	0.02745	0.00350

## Appendix D – Air Quality Modelling Details

### D.1 Ainley Top Detailed Assessment

Kirklees Council has modelled the annual mean NO<sub>x</sub> for 2014 in the area around Ainley Top Roundabout. This modelling was conducted to determine the boundaries of the AQMA.

Kirklees Council has used Atmospheric Dispersion Modelling System for Urban areas (ADMS Urban) to create this model and validated it against the 2014 automatic monitoring data.

Meteorological Data for the model has been taken from Huddersfield Civic 3 Weather Station. The weather data for 2004 has been selected as the weather patterns in that year are representative of the usual weather conditions in the district.

The Traffic Figures have been obtained from the Department of Transport for 2013 count points in close proximity to the assessment areas.

Traffic counts and average speeds were entered into the Emission Factor Toolkit 2014

Background figures for the model have been taken from the *2014 based background maps* (DEFRA).

The topography and road layout was obtained from Kirklees Council GIS data and ordinance survey records.

Kirklees conducted a statistical procedure as set out in TG(09) to determine the model uncertainty and performance. Table D.1.1 indicates the results at diffusion tube sites and the results of the statistical analysis are contained within Table D.1.2 and Figure D.1.1.

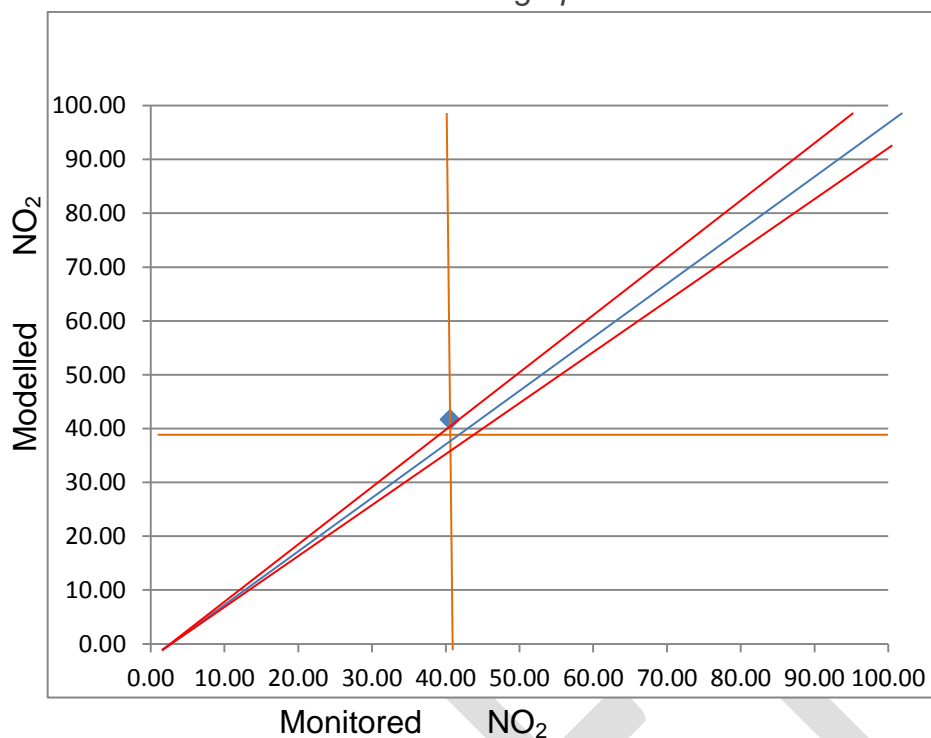
Table D.1.1 Results of Run at diffusion tube sites and statistical analysis of model

	Tube result (µg/m <sup>3</sup> )	Modelled increment NO <sub>x</sub> (µg/m <sup>3</sup> )	Calculated NO <sub>2</sub> from NO <sub>x</sub> (µg/m <sup>3</sup> )	% Difference	Correction Factor
Roadside 6	<b>41.70</b>	29.99	40.61	-3	0.97

Table D.1.2 Statistical analysis of the corrected data

Ainley Top Run 2 - 2014	
RMSE	<b>1.09</b>
Fractional Bias	<b>0.03</b>

Figure D.1.1 NO<sub>2</sub> Monitored / Modelled scatter graph



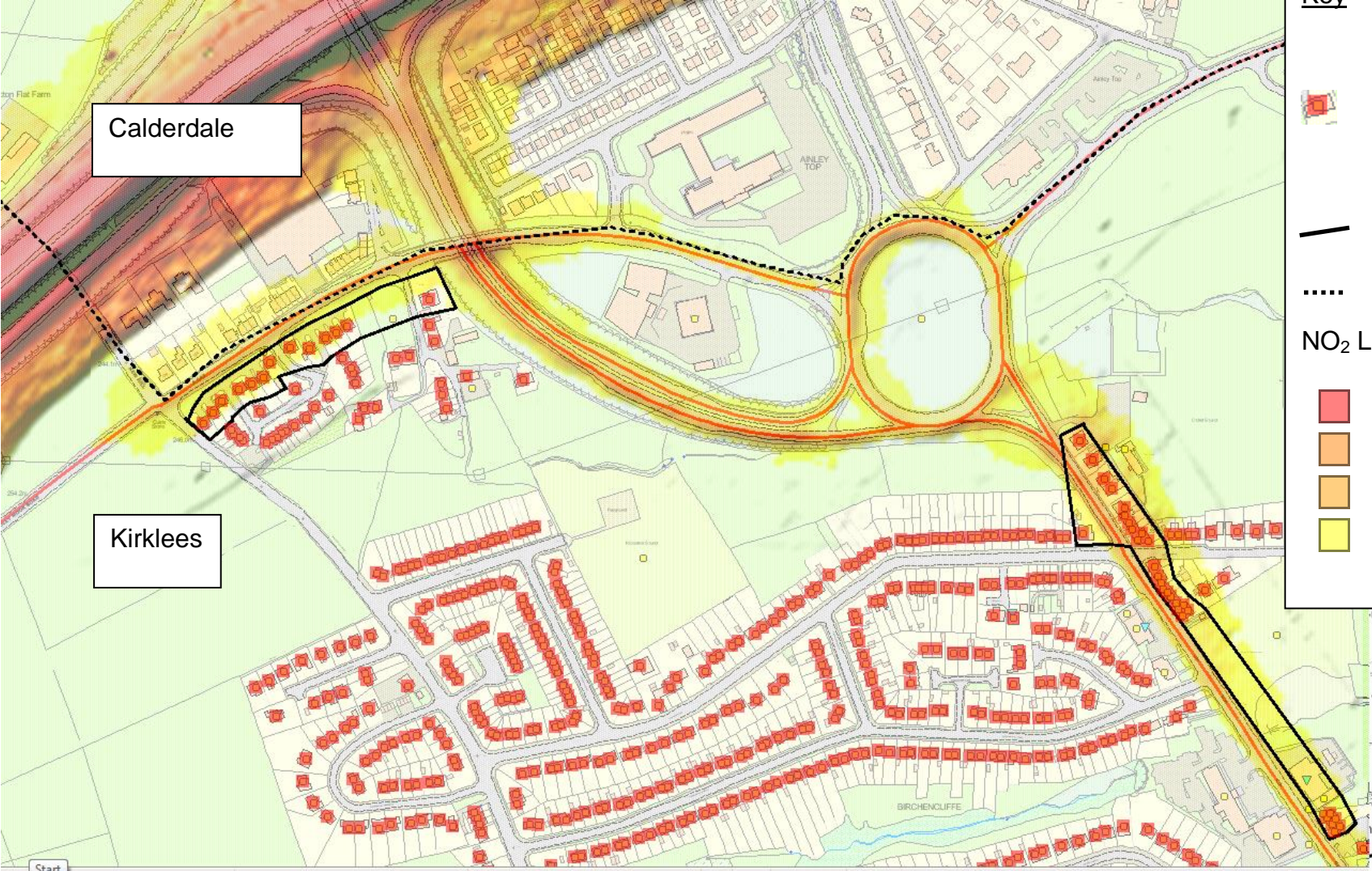
The statistical analysis carried out at the validation stage shows that the model accuracy is good and the fractional bias indicates that the model is only slightly underestimating

Figure D.1.1 graphs the correlation between the monitored and modelled data. It is clear to see that trend line is close to the mid-point and all points fall well within the +/- 5% region

Map D.1 was constructed using the correction factor of 0.97. The yellow and red areas indicate the areas of exceedance and how NO<sub>2</sub> diffuses around the Ainley Top Roundabout assessment area



Map D.1 Ainley Top AQMA



**Key**

- Residential Property
- AQMA
- Council Boundary

**NO<sub>2</sub> Levels:**

- >60µg/m<sup>3</sup>
- 50 - 60µg/m<sup>3</sup>
- 45 - 50µg/m<sup>3</sup>
- 40 - 45µg/m<sup>3</sup>



**D.2 Birkenshaw Detailed Assessment**

Kirklees Council has modelled the annual mean NO<sub>x</sub> for 2015 in the area of Birkenshaw. This modelling was conducted to determine the boundaries of the AQMA.

Kirklees Council has used Atmospheric Dispersion Modelling System for Urban areas (ADMS Urban) to create this model and validated it against the 2015 automatic monitoring data.

Meteorological Data for the model has been taken from Huddersfield Civic 3 Weather Station. The weather data for 2004 has been selected as the weather patterns in that year are representative of the usual weather conditions in the district.

The Traffic Figures have been obtained from the Department of Transport for 2015 count points in close proximity to the assessment areas.

Traffic counts and average speeds were entered into the Emission Factor Toolkit 2014

Background figures for the model have been taken from the *2015 based background maps* (DEFRA).

The topography and road layout was obtained from Kirklees Council GIS data and ordinance survey records.

Kirklees conducted a statistical procedure as set out in TG(09) to determine the model uncertainty and performance. Table D.2.1 indicates the results at diffusion tube sites and the results of the statistical analysis are contained within Table D.2.2 and Figure D.2.1.

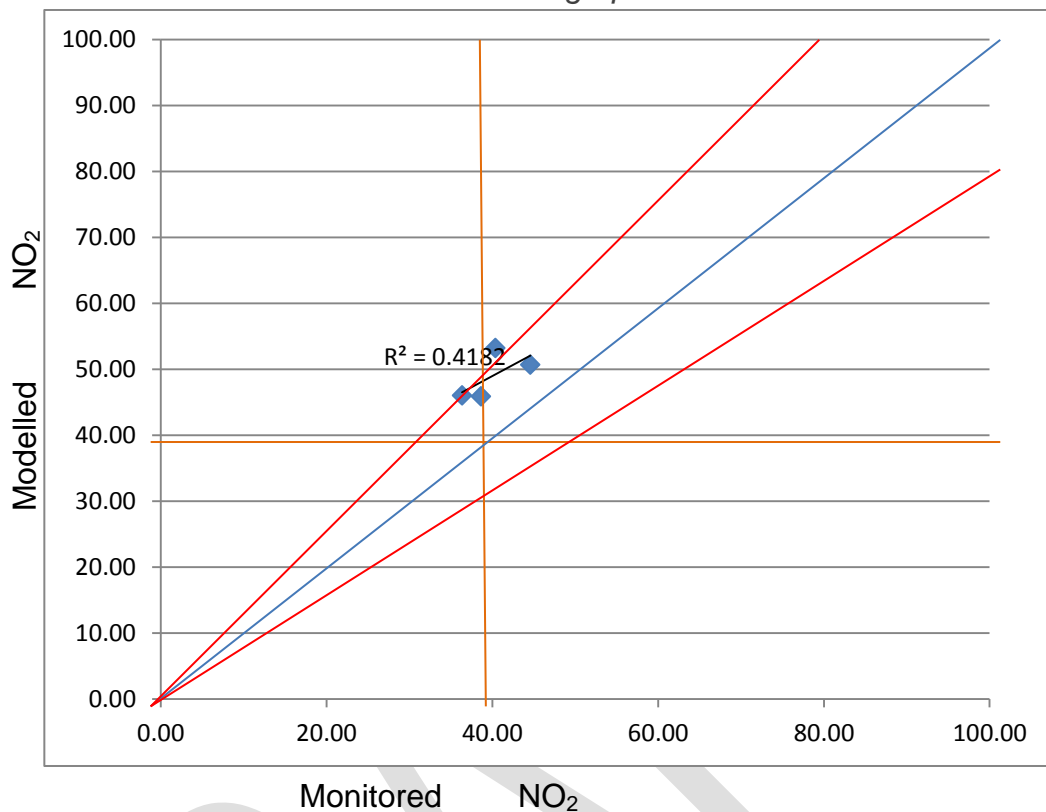
*Table D.2.1 Results of Run at diffusion tube sites and statistical analysis of model*

	Tube result (µg/m <sup>3</sup> )	Modelled increment NO <sub>x</sub> (µg/m <sup>3</sup> )	Calculated NO <sub>2</sub> from NO <sub>x</sub> (µg/m <sup>3</sup> )	% Difference	Correction Factor
<b>RS4</b>	44.60	70.09	50.71	14	0.88
<b>Tube 13</b>	40.38	77.69	53.22	32	0.76
<b>Tube 37</b>	36.36	56.64	46.04	27	0.79
<b>Tube 38</b>	38.66	56.17	45.87	19	0.84

*Table D.2.2 Statistical analysis of the corrected data*

<b>Birkenshaw Run - 2015</b>	
<b>RMSE</b>	<b>7.05</b>
<b>Fractional Bias</b>	<b>-0.20</b>

Figure D.2.1 NO<sub>2</sub> Monitored / Modelled scatter graph

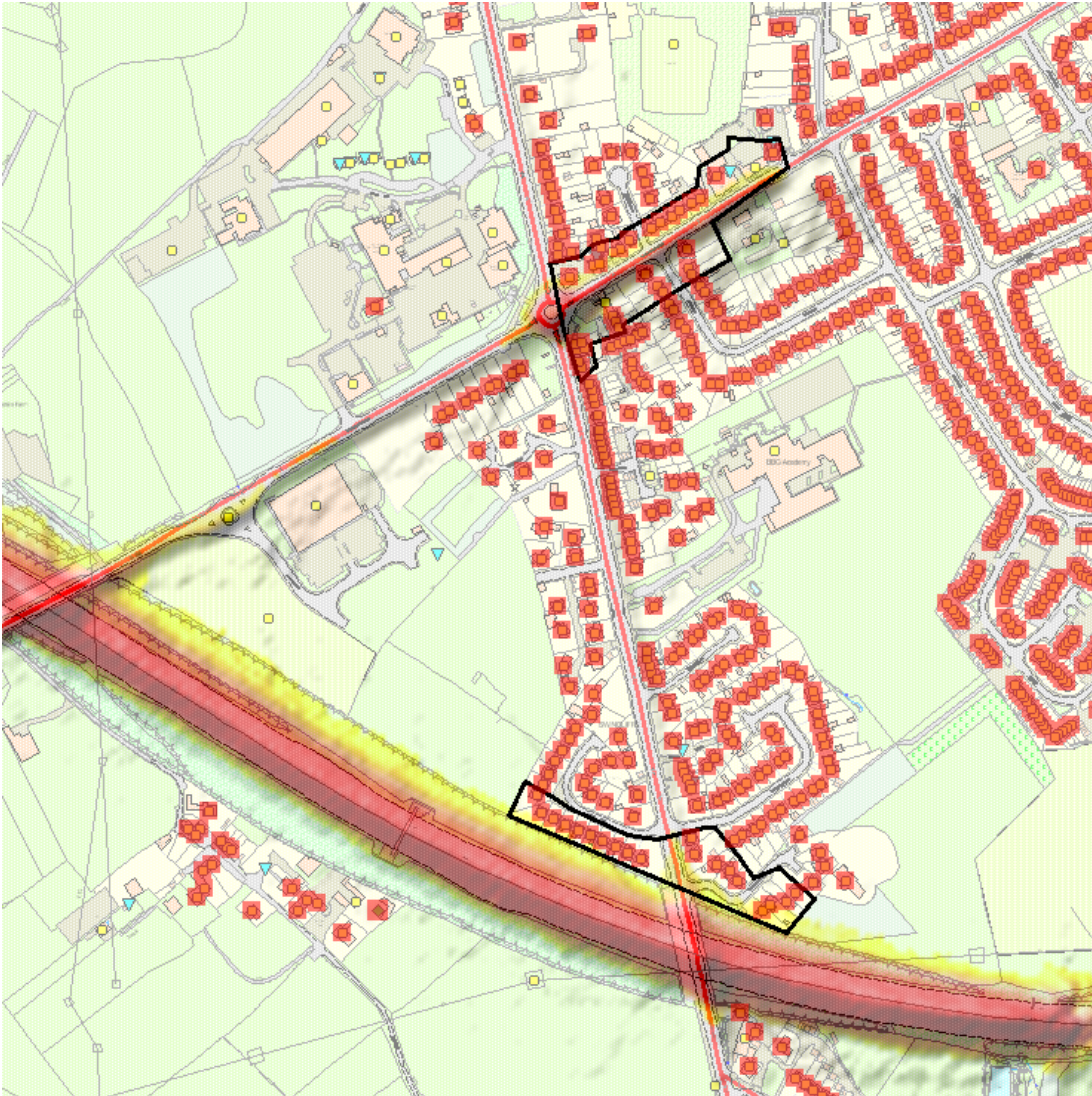


The statistical analysis carried out at the validation stage shows that the model accuracy is average and the fractional bias indicates that the model is over estimating



Figure D.2.1 graphs the correlation between the monitored and modelled data. It is clear to see that trend line falls within the +/- 20% region

Map D.2 was constructed using the correction factor of 0.88. The yellow and red areas indicate the areas of exceedance and how NO<sub>2</sub> diffuses around the Ainley Top Roundabout assessment area





Map D.2 Birkenshaw AQMA



**Key**

-  Residential Property
-  AQMA

**NO<sub>2</sub> Levels:**

-  >60µg/m<sup>3</sup>
-  50 - 60µg/m<sup>3</sup>
-  45 - 50µg/m<sup>3</sup>
-  40 - 45µg/m<sup>3</sup>

### D.3 Eastborough Detailed Assessment

Kirklees Council has modelled the annual mean NO<sub>x</sub> for 2015 in the area of Eastborough. This modelling was conducted to determine the boundaries of the AQMA.

Kirklees Council has used Atmospheric Dispersion Modelling System for Urban areas (ADMS Urban) to create this model and validated it against the 2015 automatic monitoring data.

Meteorological Data for the model has been taken from Huddersfield Civic 3 Weather Station. The weather data for 2004 has been selected as the weather patterns in that year are representative of the usual weather conditions in the district.

The Traffic Figures have been obtained from the Department of Transport for 2015 count points in close proximity to the assessment areas.

Traffic counts and average speeds were entered into the Emission Factor Toolkit 2014

Background figures for the model have been taken from the 2015 based background maps (DEFRA).

The topography and road layout was obtained from Kirklees Council GIS data and ordinance survey records.

Kirklees conducted a statistical procedure as set out in TG(09) to determine the model uncertainty and performance. Table D.3.1 indicates the results at diffusion tube sites and the results of the statistical analysis are contained within Table D.3.2 and Figure D.3.1.

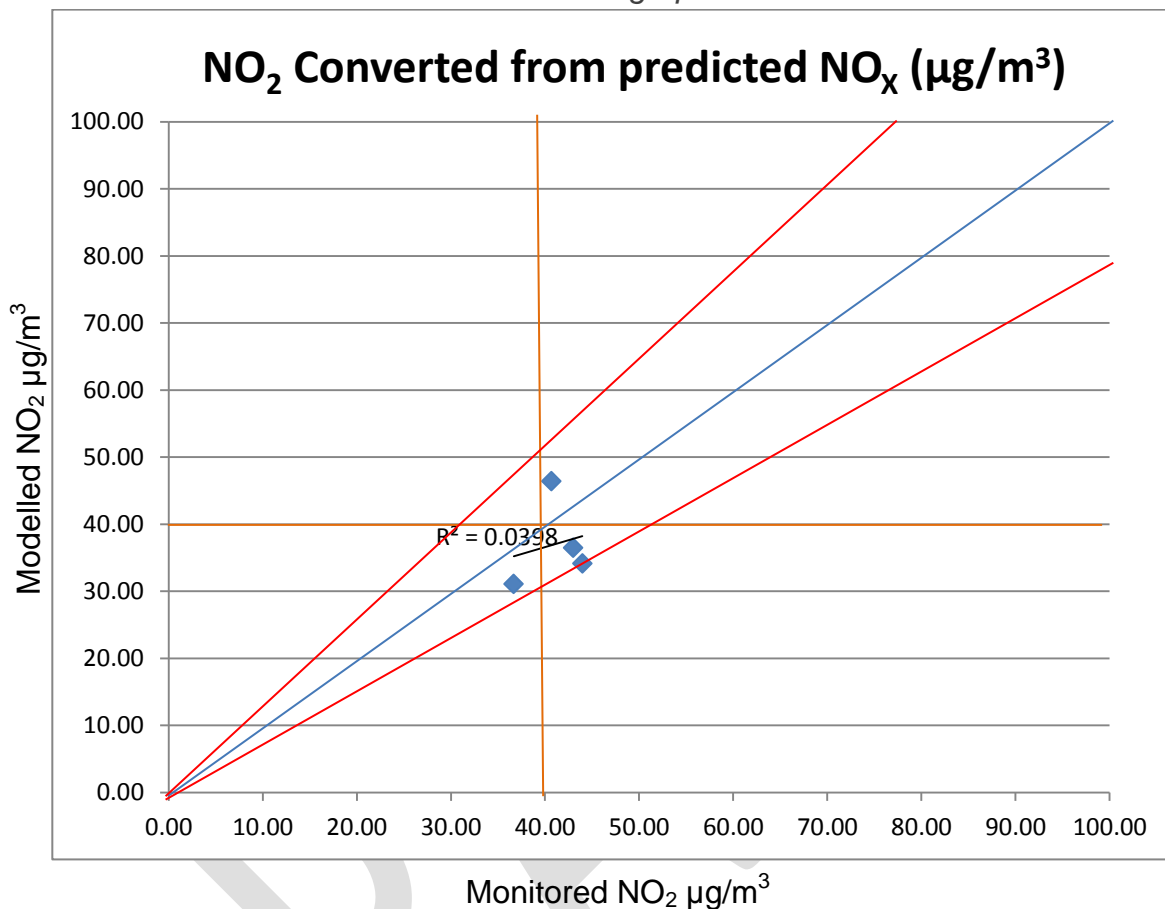
Table D.3.1 Results of Run at diffusion tube sites and statistical analysis of model

	Tube result (µg/m <sup>3</sup> )	Modelled increment NO <sub>x</sub> (µg/m <sup>3</sup> )	Calculated NO <sub>2</sub> from NO <sub>x</sub> (µg/m <sup>3</sup> )	% Difference	Correction Factor
<b>Tube 20</b>	40.68	100.15	46.39	14	0.88
<b>Tube 40</b>	60.39	86.89	41.48	-31	1.46
<b>Tube 42</b>	42.99	74.35	36.48	-15	1.18
<b>Tube 43</b>	43.97	68.74	34.12	-22	1.29
<b>Tube 44</b>	36.68	61.83	31.11	-15	1.18

Table D.3.2 Statistical analysis of the corrected data

Eastborough Run - 2015	
RMSE	8.95
Fractional Bias	0.17

Figure D.3.1 NO<sub>2</sub> Monitored / Modelled scatter graph



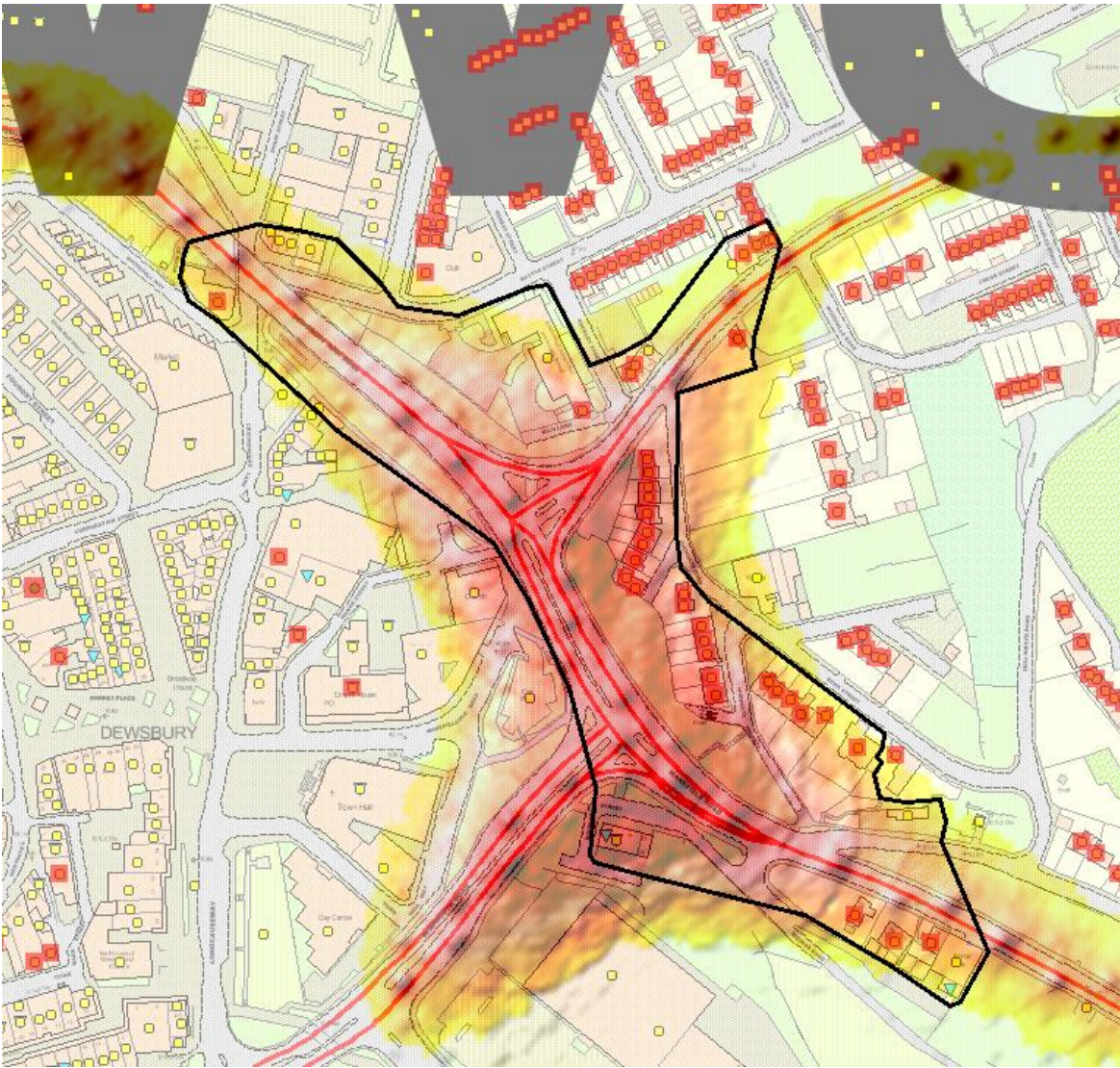
The statistical analysis carried out at the validation stage shows that the model accuracy is average and the fractional bias indicates that the model in the most part is underestimating.

Figure D.3.1 graphs the correlation between the monitored and modelled data. It is clear to see that trend line is close to the mid-point and all points fall within the +/- 20% region

Map D.3 was constructed using the correction factor of 1.22. The yellow and red areas indicate the areas of exceedance and how NO<sub>2</sub> diffuses around the Eastborough assessment area



Map D.3 Eastborough AQMA



**Key**

- Residential Property
- AQMA

**NO<sub>2</sub> Levels:**

- >60µg/m<sup>3</sup>
- 50 - 60µg/m<sup>3</sup>
- 45 - 50µg/m<sup>3</sup>
- 40 - 45µg/m<sup>3</sup>

### D.4 Edgerton Detailed Assessment

Kirklees Council has modelled the annual mean NO<sub>x</sub> for 2015 in the area of Edgerton. This modelling was conducted to determine the boundaries of the AQMA.

Kirklees Council has used Atmospheric Dispersion Modelling System for Urban areas (ADMS Urban) to create this model and validated it against the 2015 automatic monitoring data.

Meteorological Data for the model has been taken from Huddersfield Civic 3 Weather Station. The weather data for 2004 has been selected as the weather patterns in that year are representative of the usual weather conditions in the district.

The Traffic Figures have been obtained from the Department of Transport for 2015 count points in close proximity to the assessment areas. Traffic counts and average speeds were entered into the Emission Factor Toolkit 2014

Background figures for the model have been taken from the 2015 based background maps (DEFRA).

The topography and road layout was obtained from Kirklees Council GIS data and ordinance survey records.

Kirklees conducted a statistical procedure as set out in TG(09) to determine the model uncertainty and performance. Table D.4.1 indicates the results at diffusion tube sites and the results of the statistical analysis are contained within Table D.4.2 and Figure D4.1.

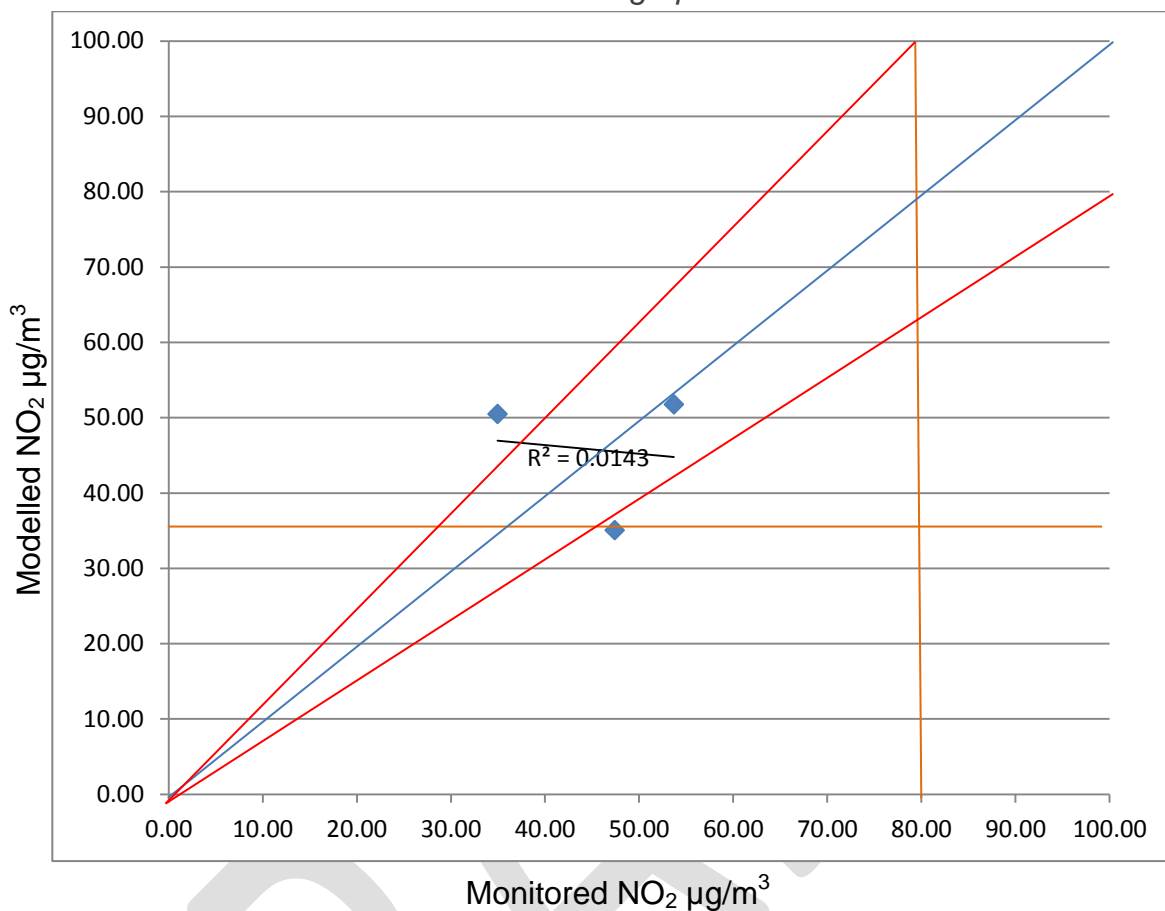
Table D.4.1 Results of Run at diffusion tube sites and statistical analysis of model

	Tube result (µg/m <sup>3</sup> )	Modelled increment NO <sub>x</sub> (µg/m <sup>3</sup> )	Calculated NO <sub>2</sub> from NO <sub>x</sub> (µg/m <sup>3</sup> )	% Difference	Correction Factor
<b>Tube 3</b>	53.70	73.10	51.72	-4	1.04
<b>Tube 31</b>	34.96	69.30	50.45	44	0.69
<b>Tube 32</b>	47.42	28.39	35.04	-26	1.35

Table D.4.2 Statistical analysis of the corrected data

Edgerton Run - 2015	
RMSE	8.14
Fractional Bias	-0.01

Figure D4.1 NO2 Monitored / Modelled scatter graph



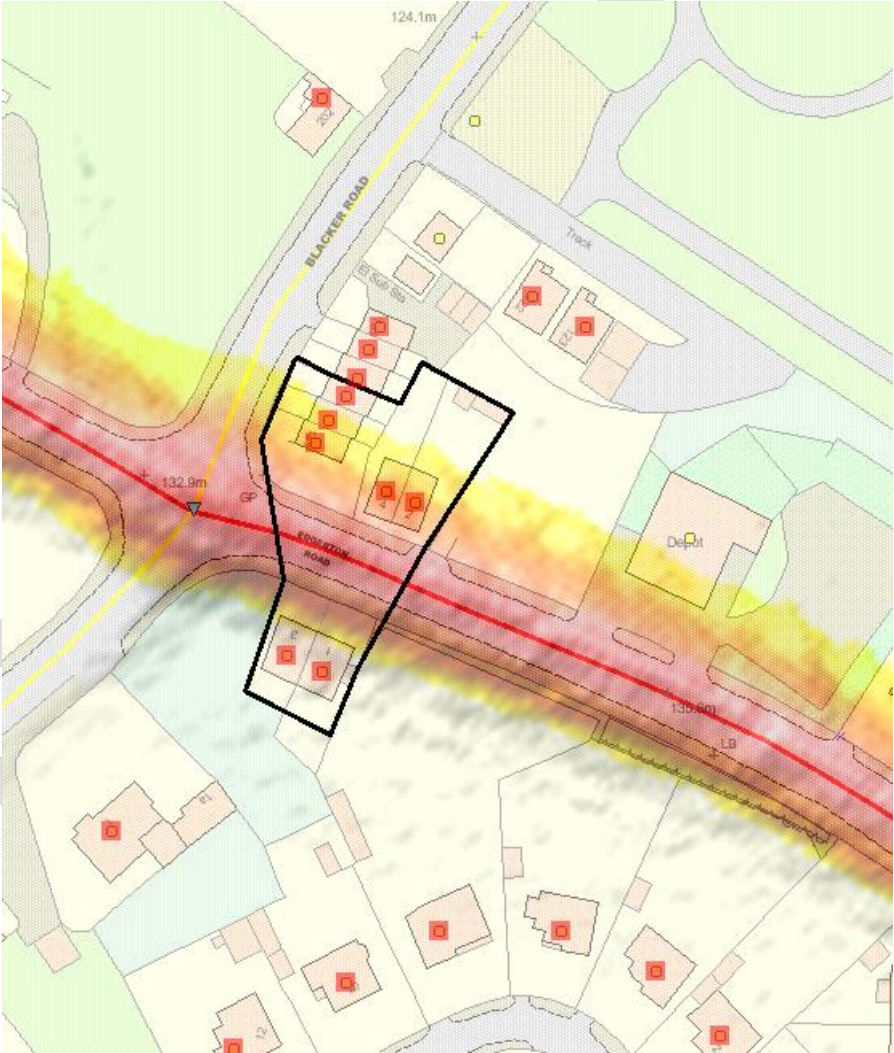
The statistical analysis carried out at the validation stage shows that the model accuracy is average and the fractional bias indicates that the model is overestimating.

Figure D.4.1 graphs the correlation between the monitored and modelled data. It is clear to see that trend line is close to the mid-point and all points fall within the +/- 20% region

Map D.4 was constructed without a correction factor. The yellow and red areas indicate the areas of exceedance and how NO<sub>2</sub> diffuses around the Edgerton assessment area



Map D.4 Edgerton AQMA



**Key**

- Residential Property
- AQMA

**NO<sub>2</sub> Levels:**

- >60µg/m<sup>3</sup>
- 50 - 60µg/m<sup>3</sup>
- 45 - 50µg/m<sup>3</sup>
- 40 - 45µg/m<sup>3</sup>

**D.5 Heckmondwike Detailed Assessment**

Kirklees Council has modelled the annual mean NO<sub>x</sub> for 2015 in the area of Heckmondwike. This modelling was conducted to determine the boundaries of the AQMA.

Kirklees Council has used Atmospheric Dispersion Modelling System for Urban areas (ADMS Urban) to create this model and validated it against the 2015 automatic monitoring data.

Meteorological Data for the model has been taken from Huddersfield Civic 3 Weather Station. The weather data for 2004 has been selected as the weather patterns in that year are representative of the usual weather conditions in the district.

The Traffic Figures have been obtained from the Department of Transport for 2015 count points in close proximity to the assessment areas.

Traffic counts and average speeds were entered into the Emission Factor Toolkit 2014

Background figures for the model have been taken from the 2015 based background maps (DEFRA).

The topography and road layout was obtained from Kirklees Council GIS data and ordinance survey records.

Kirklees conducted a statistical procedure as set out in TG(09) to determine the model uncertainty and performance. Table D.5.1 indicates the results at diffusion tube sites and the results of the statistical analysis are contained within Table D.5.2 and Figure D.5.1.

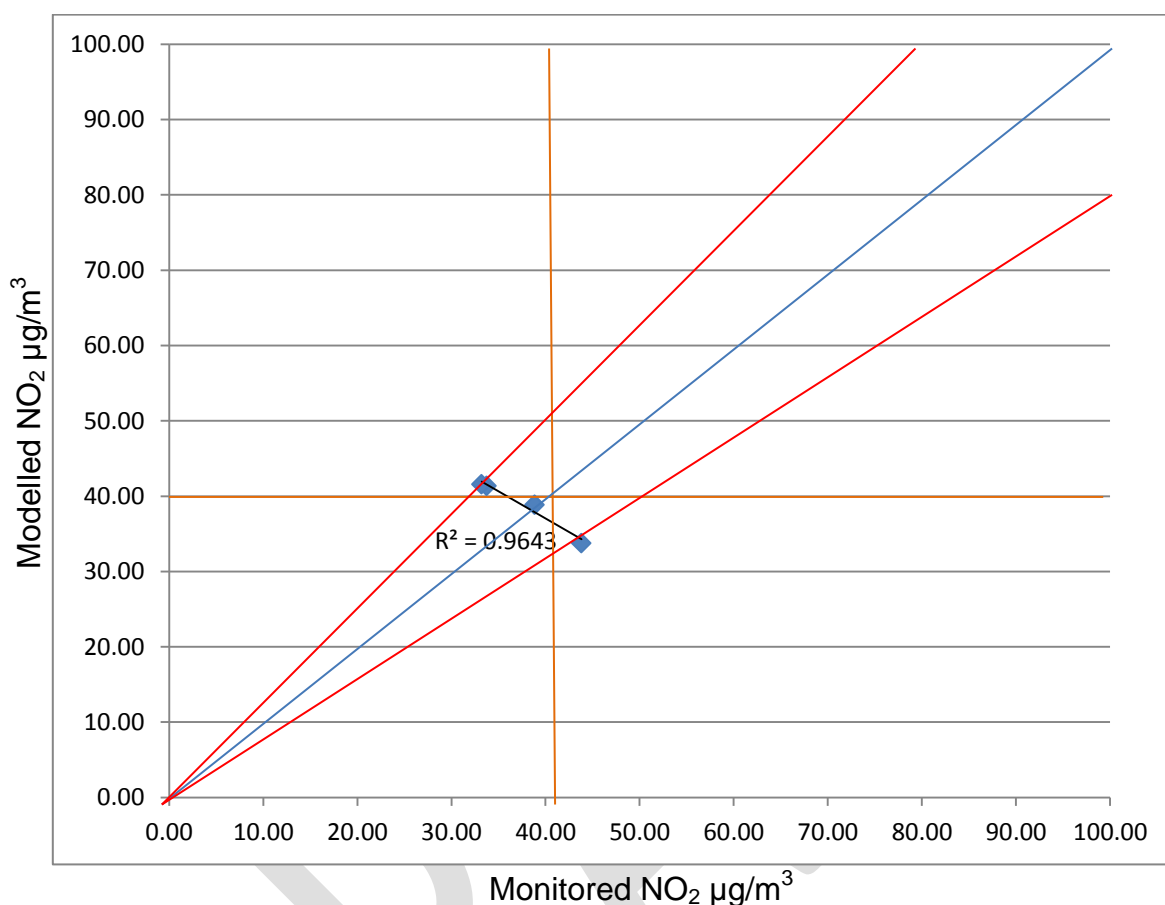
*Table D.5.1 Results of Run at diffusion tube sites and statistical analysis of model*

	Tube result (µg/m <sup>3</sup> )	Modelled increment NO <sub>x</sub> (µg/m <sup>3</sup> )	Calculated NO <sub>2</sub> from NO <sub>x</sub> (µg/m <sup>3</sup> )	% Difference	Correction Factor
<b>Tube 33</b>	33.75	44.12	41.38	23	0.82
<b>Tube 34</b>	33.21	44.64	41.58	25	0.80
<b>Tube 35</b>	38.86	37.67	38.85	0	1.00
<b>Tube 48</b>	43.82	25.33	33.74	-23	1.30

*Table D.5.2 Statistical analysis of the corrected data*

<b>Heckmondwike Run - 2015</b>	
<b>RMSE</b>	5.73
<b>Fractional Bias</b>	-0.04

Figure D5.1 NO<sub>2</sub> Monitored / Modelled scatter graph



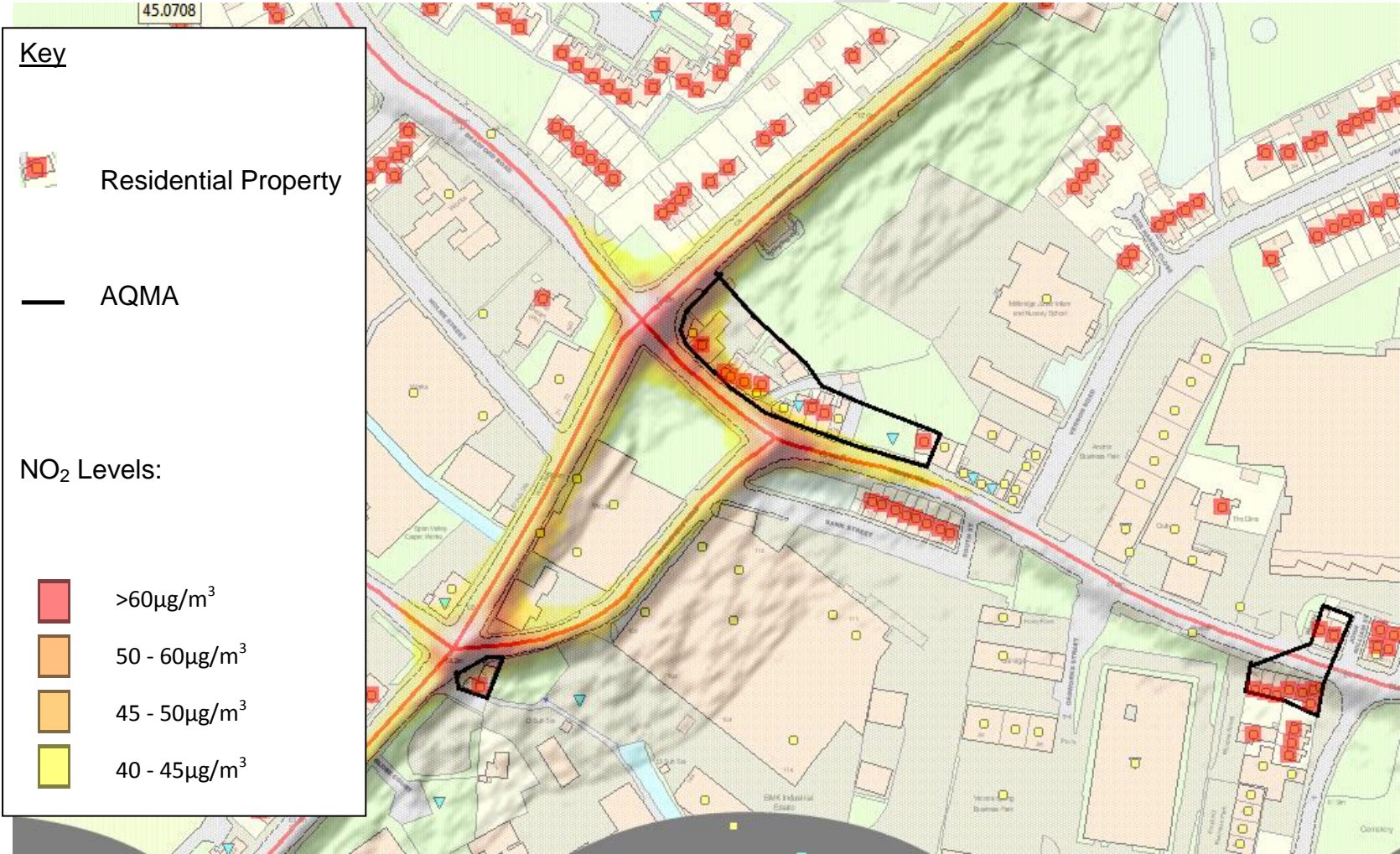
The statistical analysis carried out at the validation stage shows that the model accuracy is average and the fractional bias indicates that the model average distribution of results is similar to the monitoring results.

Figure D.5.1 graphs the correlation between the monitored and modelled data. It is clear to see that trend line is close to the mid-point and all points fall within the +/- 20% region

Map D.5 was constructed using the correction factor of 0.98. The yellow and red areas indicate the areas of exceedance and how NO<sub>2</sub> diffuses around the Heckmondwike assessment area



Map D.5 Heckmondwike AQMA



**D.6 Huddersfield Town Centre Detailed Assessment**

Kirklees Council has modelled the annual mean NO<sub>x</sub> for 2015 in the area of Heckmondwike. This modelling was conducted to determine the boundaries of the AQMA.

Kirklees Council has used Atmospheric Dispersion Modelling System for Urban areas (ADMS Urban) to create this model and validated it against the 2015 automatic monitoring data.

Meteorological Data for the model has been taken from Huddersfield Civic 3 Weather Station. The weather data for 2004 has been selected as the weather patterns in that year are representative of the usual weather conditions in the district.

The Traffic Figures have been obtained from the Department of Transport for 2015 count points in close proximity to the assessment areas.

Traffic counts and average speeds were entered into the Emission Factor Toolkit 2014

Background figures for the model have been taken from the 2015 based background maps (DEFRA).

The topography and road layout was obtained from Kirklees Council GIS data and ordinance survey records.

Kirklees conducted a statistical procedure as set out in TG(09) to determine the model uncertainty and performance. Table D.6.1 indicates the results at diffusion tube sites and the results of the statistical analysis are contained within Table D.6.2 and Figure D.6.1.

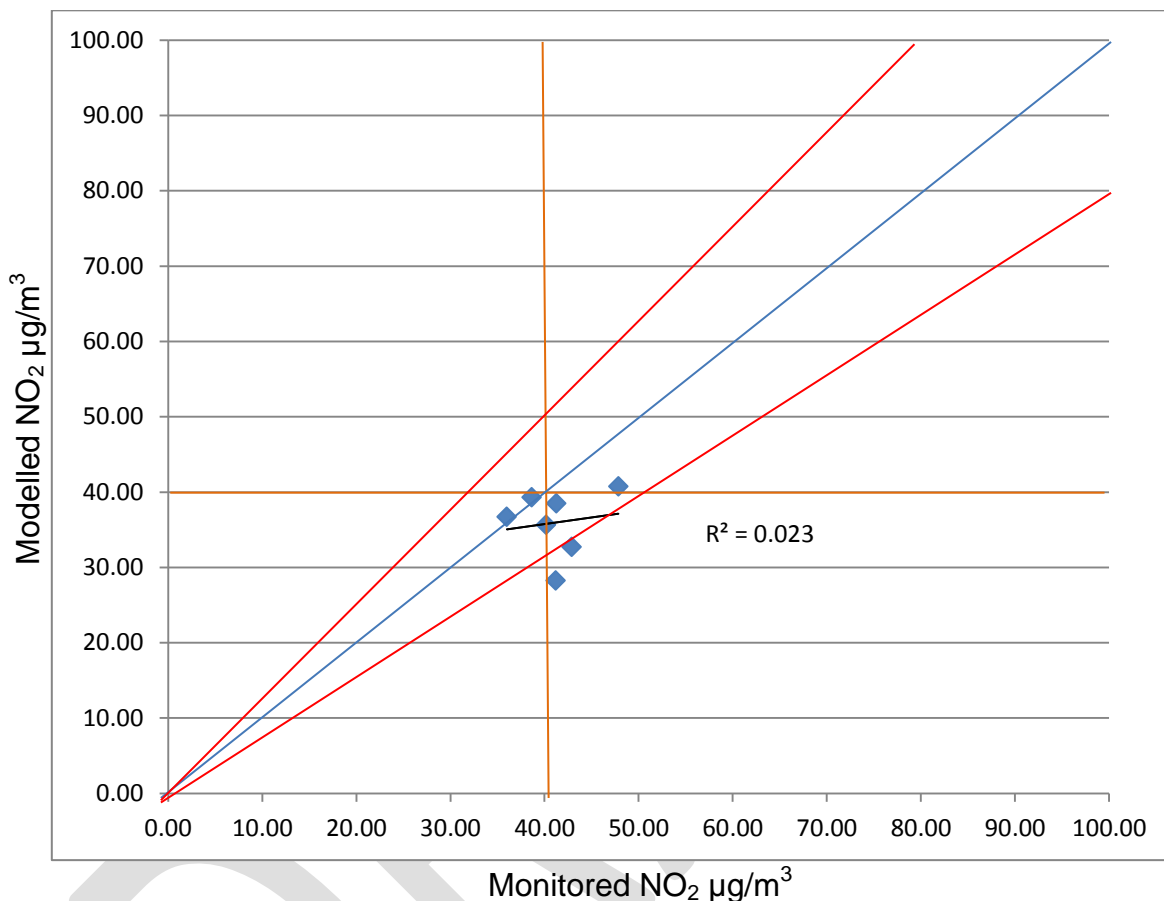
*Table D.6.1 Results of Run at diffusion tube sites and statistical analysis of model*

	Tube result (µg/m <sup>3</sup> )	Modelled increment NO <sub>x</sub> (µg/m <sup>3</sup> )	Calculated NO <sub>2</sub> from NO <sub>x</sub> (µg/m <sup>3</sup> )	% Difference	Correction Factor
<b>Roadside 3</b>	36.00	32.31	36.68	2	0.98
<b>Tube 16</b>	41.19	12.92	28.22	-31	1.46
<b>Tube 17</b>	41.25	36.70	38.46	-7	1.07
<b>Tube 20</b>	40.17	29.79	35.63	-11	1.13
<b>Tube 33</b>	47.85	42.46	40.74	-15	1.17
<b>Tube 13</b>	38.64	38.74	39.28	2	0.98
<b>Tube 54</b>	42.90	22.85	32.67	-24	1.31

*Table D.6.2 Statistical analysis of the corrected data*

<b>Town Centre Run - 2015</b>	
<b>RMSE</b>	7.10
<b>Fractional Bias</b>	0.13

Figure D.6.1 NO<sub>2</sub> Monitored / Modelled scatter graph



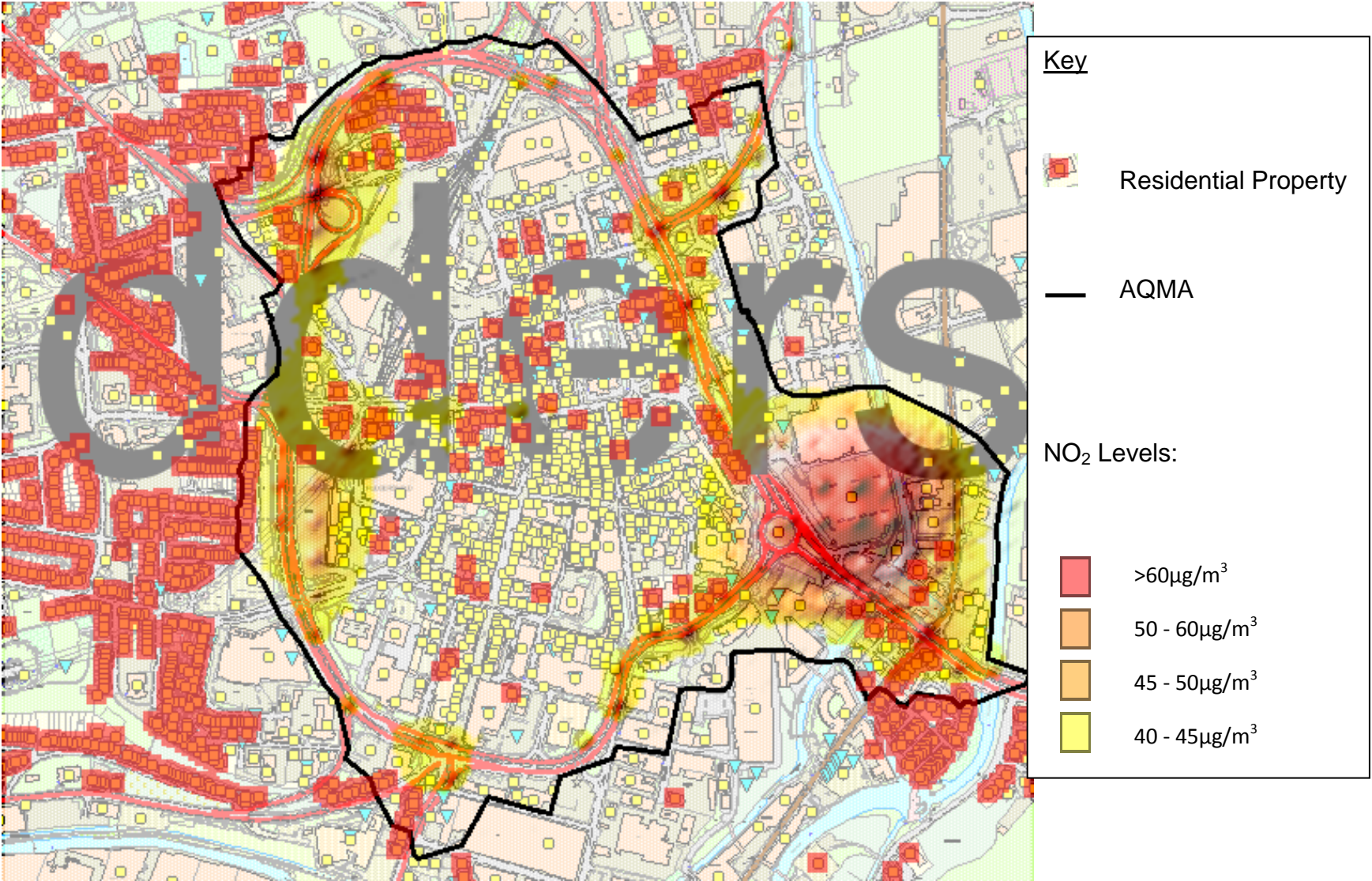
The statistical analysis carried out at the validation stage shows that the model accuracy is average and the fractional bias indicates that the model average distribution of results is similar to the monitoring results.

Figure D.6.1 graphs the correlation between the monitored and modelled data. It is clear to see that trend line is close to the mid-point and all points fall within the +/- 20% region

Map D.6 was constructed using the correction factor of 0.95. The yellow and red areas indicate the areas of exceedance and how NO<sub>2</sub> diffuses around the Huddersfield Town Centre assessment area



Map D.6 Huddersfield Town Centre AQMA



**D.7 Outlane Detailed Assessment**

Kirklees Council has modelled the annual mean NO<sub>x</sub> for 2015 in the area of Outlane. This modelling was conducted to determine the boundaries of the AQMA.

Kirklees Council has used Atmospheric Dispersion Modelling System for Urban areas (ADMS Urban) to create this model and validated it against the 2015 automatic monitoring data.

Meteorological Data for the model has been taken from Huddersfield Civic 3 Weather Station. The weather data for 2004 has been selected as the weather patterns in that year are representative of the usual weather conditions in the district.

The Traffic Figures have been obtained from the Department of Transport for 2015 count points in close proximity to the assessment areas.

Traffic counts and average speeds were entered into the Emission Factor Toolkit 2014

Background figures for the model have been taken from the *2015 based background maps* (DEFRA).

The topography and road layout was obtained from Kirklees Council GIS data and ordinance survey records.

Kirklees conducted a statistical procedure as set out in TG(09) to determine the model uncertainty and performance. Table D.7.1 indicates the results at diffusion tube sites and the results of the statistical analysis are contained within Table D.7.2 and Figure D.7.1.

*Table D.7.1 Results of Run at diffusion tube sites and statistical analysis of model*

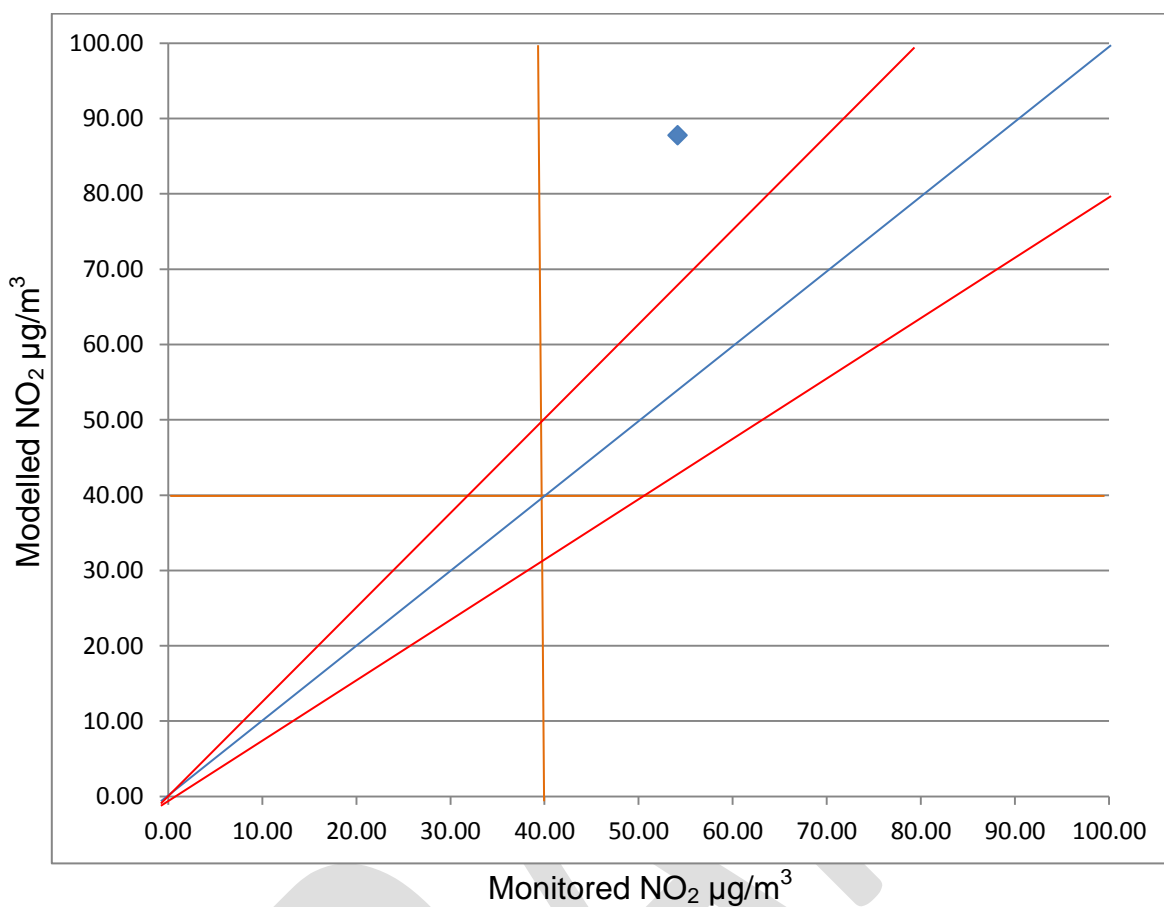
	Tube result (µg/m <sup>3</sup> )	Modelled increment NO <sub>x</sub> (µg/m <sup>3</sup> )	Calculated NO <sub>2</sub> from NO <sub>x</sub> (µg/m <sup>3</sup> )	% Difference	Correction Factor
<b>Tube 47</b>	54.16	226.83	87.75	62	0.62

*Table D.7.2 Statistical analysis of the corrected data*

<b>Outlane Run - 2015</b>	
<b>RMSE</b>	16.80
<b>Fractional Bias</b>	-0.47



Figure D.7.1 NO<sub>2</sub> Monitored / Modelled scatter graph

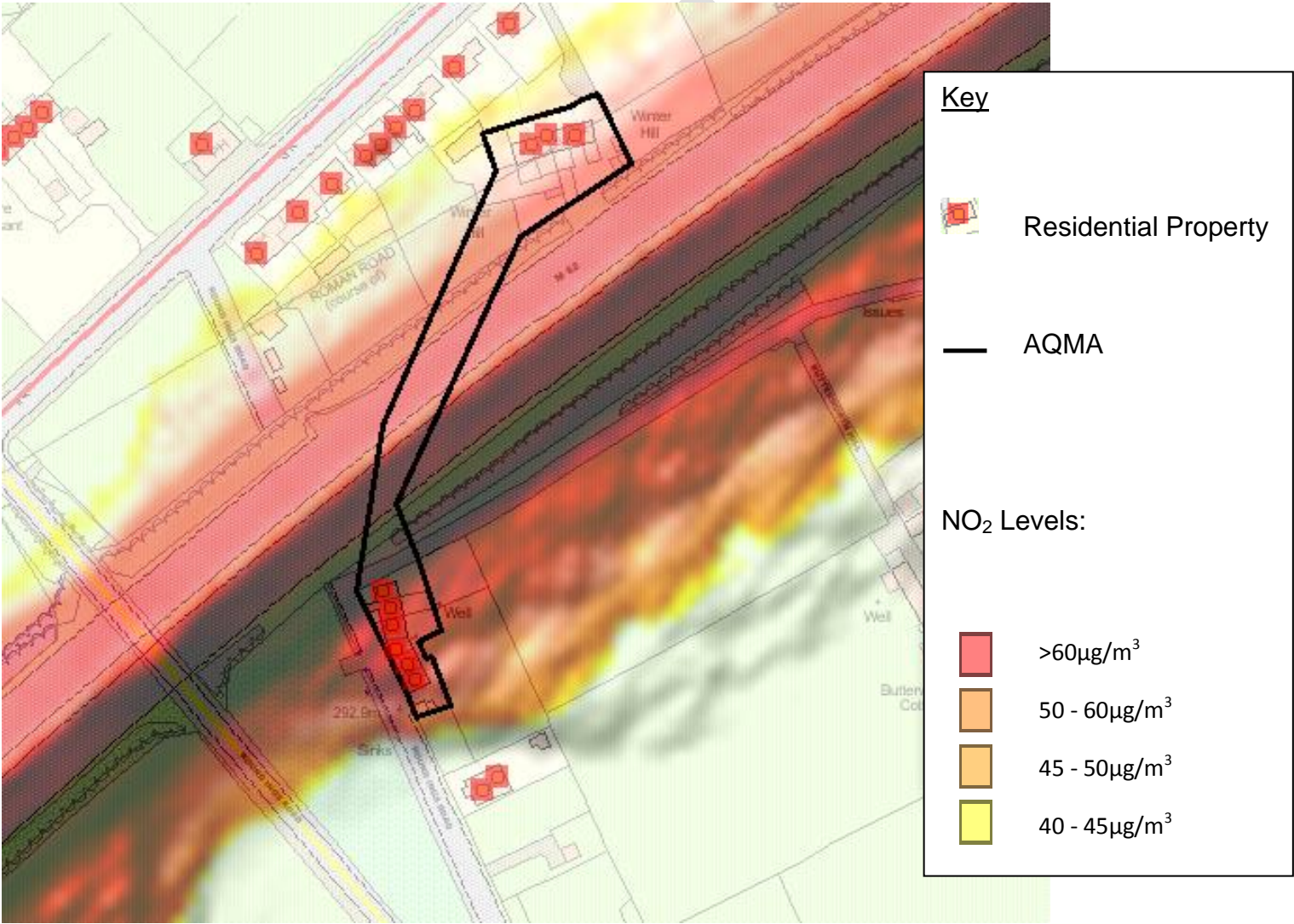


The statistical analysis carried out at the validation stage shows that the model is over predicting.

Figure D.7.1 graphs the correlation between the monitored and modelled data.

Map D.7 was constructed using the correction factor of 0.62. The yellow and red areas indicate the areas of exceedance and how NO<sub>2</sub> diffuses around the Huddersfield Town Centre assessment area

Map D.7 Outlane AQMA



### D.8 AQMA1 Detailed Assessment

Kirklees Council has modelled the annual mean NO<sub>x</sub> for 2015 in the area of Outlane. This modelling was conducted to determine the boundaries of the AQMA.

Kirklees Council has used Atmospheric Dispersion Modelling System for Urban areas (ADMS Urban) to create this model and validated it against the 2015 automatic monitoring data.

Meteorological Data for the model has been taken from Huddersfield Civic 3 Weather Station. The weather data for 2004 has been selected as the weather patterns in that year are representative of the usual weather conditions in the district.

The Traffic Figures have been obtained from the Department of Transport for 2015 count points in close proximity to the assessment areas.

Traffic counts and average speeds were entered into the Emission Factor Toolkit 2014

Background figures for the model have been taken from the 2015 based background maps (DEFRA).

The topography and road layout was obtained from Kirklees Council GIS data and ordinance survey records.

Kirklees conducted a statistical procedure as set out in TG(09) to determine the model uncertainty and performance. Table D.8.1 indicates the results at diffusion tube sites and the results of the statistical analysis are contained within Table D.8.2 and Figure D.8.1.

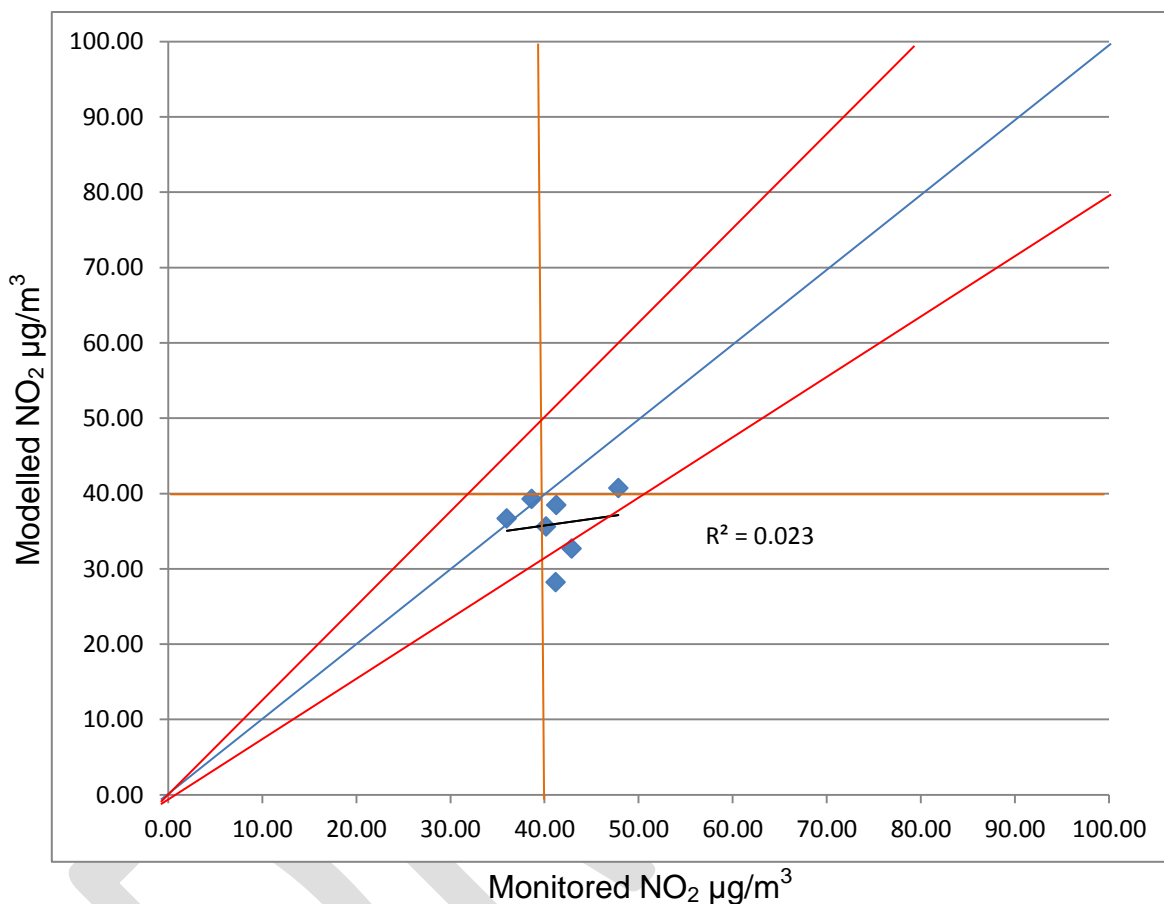
Table D.8.1 Results of Run at diffusion tube sites and statistical analysis of model

	Tube result (µg/m <sup>3</sup> )	Modelled increment NO <sub>x</sub> (µg/m <sup>3</sup> )	Calculated NO <sub>2</sub> from NO <sub>x</sub> (µg/m <sup>3</sup> )	% Difference	Correction Factor
<b>Roadside 3</b>	36.00	32.31	36.68	2	0.98
<b>Tube 16</b>	41.19	12.92	28.22	-31	1.46
<b>Tube 17</b>	41.25	36.70	38.46	-7	1.07
<b>Tube 20</b>	40.17	29.79	35.63	-11	1.13
<b>Tube 33</b>	47.85	42.46	40.74	-15	1.17
<b>Tube 13</b>	38.64	38.74	39.28	2	0.98
<b>Tube 54</b>	42.90	22.85	32.67	-24	1.31

Table D.8.2 Statistical analysis of the corrected data

AQMA 1 Run - 2015	
RMSE	7.10
Fractional Bias	0.13

Figure D.8.1 NO<sub>2</sub> Monitored / Modelled scatter graph



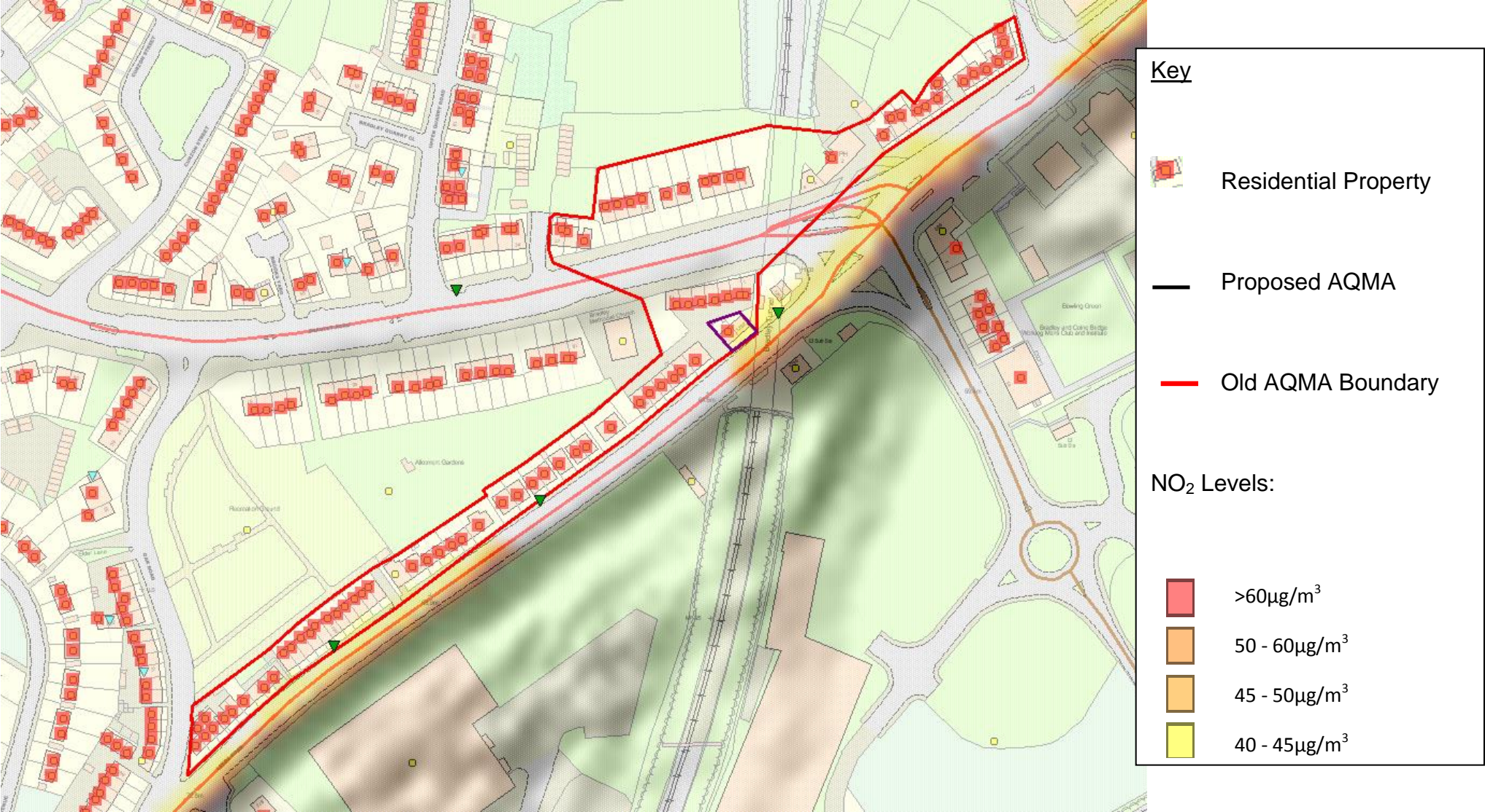
The statistical analysis carried out at the validation stage shows that the model accuracy is good and the fractional bias indicates that the model average distribution of results is similar to the monitoring results.

Figure D.8.1 graphs the correlation between the monitored and modelled data. It is clear to see that trend line is close to the mid-point and all points fall within the +/- 20% region

Map D.8 was constructed using the correction factor of 0.98. The Red line denotes the previous AQMA and the purple line indicates the new AQMA proposal in accordance with recent modelling study.



Map D.7 AQMA 1 Review







**D.9 Thornton Lodge**

Kirklees Council has modelled the annual mean NO<sub>x</sub> for 2017 in the along Lindley Moor Road. This modelling was conducted to determine the boundaries of the AQMA.

Kirklees Council has used Atmospheric Dispersion Modelling System for Urban areas (ADMS Urban) to create this model and validated it against the 2017 automatic monitoring data.

Meteorological Data for the model has been taken from Leeds / Bradford Airport Met Office Weather Station. The weather data for 2015 has been selected as the weather patterns in that year are representative of the usual weather conditions in the district.

The Traffic Figures have been obtained from the Department of Transport count points in close proximity to the assessment areas and expanded in accordance with national guidance for increase vehicle number.

Traffic counts and average speeds were entered into ADMS (Urban), which uses Emissions Factor Toolkit V8.0

Background figures for the model have been taken from the 2017 based background maps (DEFRA).

The topography and road layout was obtained from Kirklees Council GIS data and ordinance survey records.

Kirklees conducted a statistical procedure as set out in TG(09) to determine the model uncertainty and performance. Table D.9.1 indicates the results at diffusion tube sites and the results of the statistical analysis are contained within Table D.9.2 and Figure D.9.1.

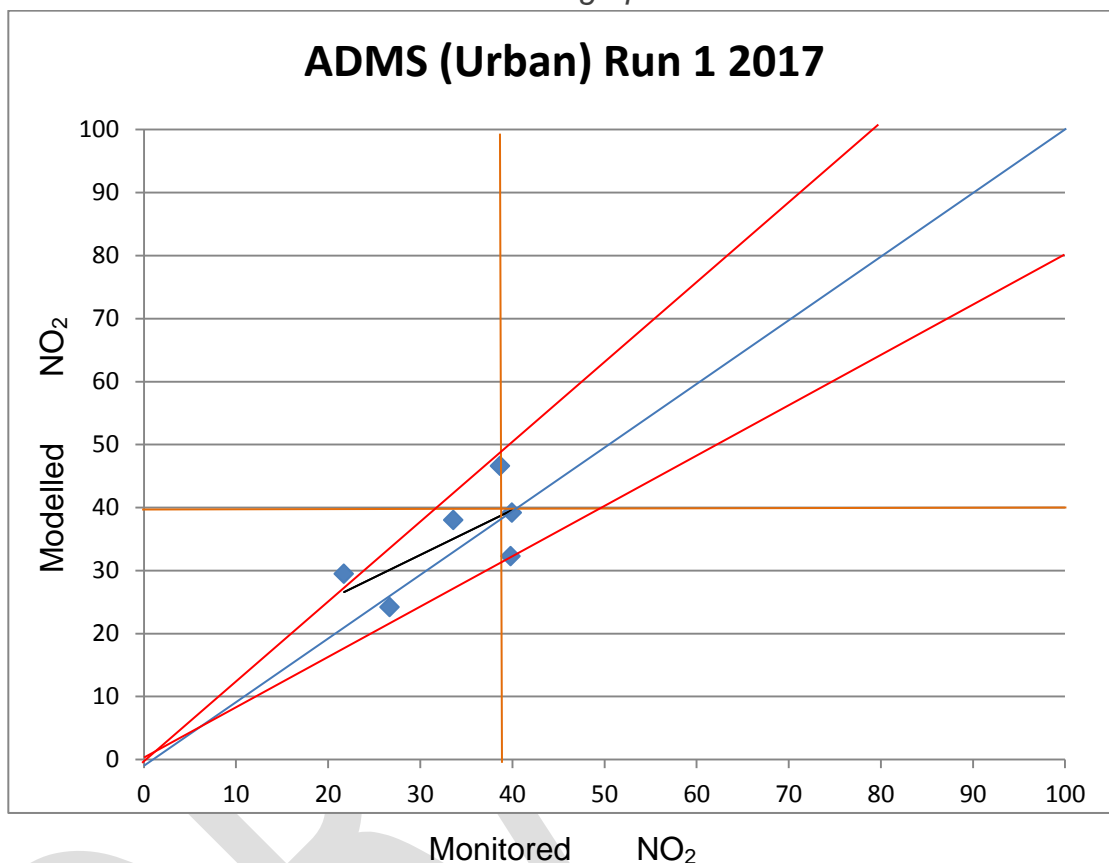
*Table D.9.1 Results of Run at diffusion tube sites and statistical analysis of model*

	<b>Monitoring results (NO<sub>2</sub> µg/m<sup>3</sup>)</b>	<b>Model Road increment NO<sub>x</sub> Prediction (µg/m<sup>3</sup>)</b>	<b>NO<sub>2</sub> Converted from predicted NO<sub>x</sub> (µg/m<sup>3</sup>)</b>	<b>% Difference of Converted NO<sub>2</sub></b>	<b>Correction Factor</b>
Tube 49	<b>38</b>	<b>118.00358</b>	<b>61.08</b>	61	0.62
Tube 50	39.19	<b>161.33688</b>	<b>72.66</b>	85	0.54
Tube 75	29.44	<b>51.54768</b>	<b>39.49</b>	34	0.75
Tube 76	32.25	<b>160.39198</b>	<b>72.42</b>	125	0.45
Tube 77	<b>46.58</b>	<b>152.08848</b>	<b>70.29</b>	51	0.66
Tube 78	24.15	77.00	48.54	101	0.50

*Table D.9.2 Statistical analysis of the corrected data*

<b>RMSE</b>	<b>29.74</b>
<b>Fractional Bias</b>	<b>-0.67</b>

Figure D.9.1 NO<sub>2</sub> Monitored / Modelled scatter graph



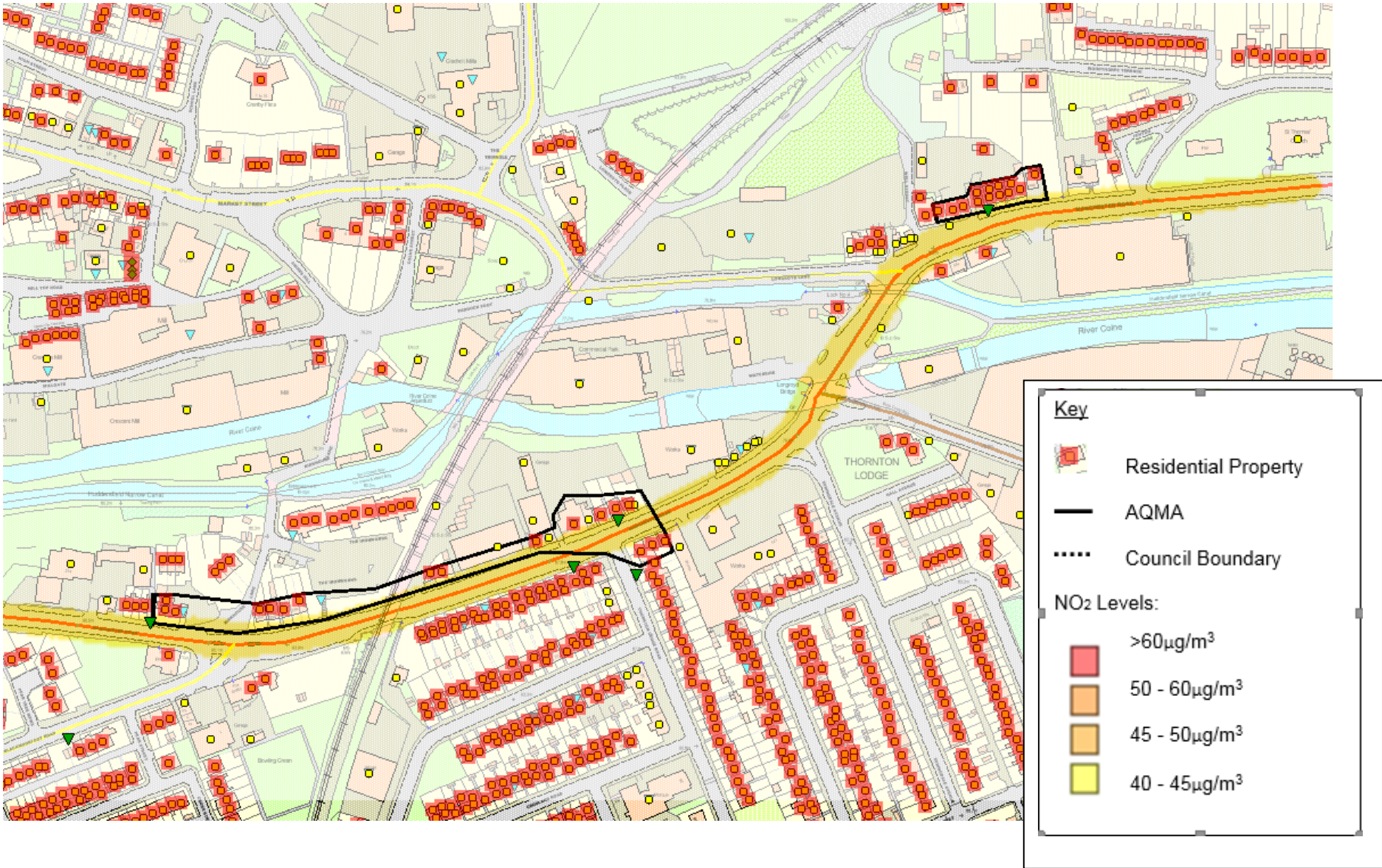
While statistical analysis carried out at the validation stage shows that the model is over estimating.

Figure D.9.1 graphs the correlation between the monitored and modelled data after correction factor of 0.55 has been applied. It is clear to see that trend line is close to the mid-point and all points fall well within the +/- 20% region

Map D.9 was constructed using the correction factor. The yellow and red areas indicate the areas of exceedance and how NO<sub>2</sub> diffuses around the Thornton Lodge assessment area



Map D.9 Thornton Lodge Assessment (AQMA 10)



DRAFT

**Name of meeting: Economy and Neighbourhoods Scrutiny Panel**

**Date: 10<sup>th</sup> October 2019**

**Title of report:** Council Owned Tree and Woodland Management Policy and; White Rose Forest update

**Purpose of report:** To discuss the new Council Owned Tree and Woodland Management Policy, for the implementation of the procedures outlined in the Tree Works Guidance Document and the Tree Risk Management Framework, and the approach to White Rose Forest development.

Key Decision - Is it likely to result in spending or saving £250k or more, or to have a significant effect on two or more electoral wards?	No
Key Decision - Is it in the <u>Council's Forward Plan (key decisions and private reports)</u> ?	Key Decision - No
The Decision - Is it eligible for call in by Scrutiny?	Yes
Date signed off by <u>Strategic Director</u> & name	Karl Battersby 1/10/19
Is it also signed off by the Service Director for Finance IT and Transactional Services?	N/A
Is it also signed off by the Service Director for Legal Governance and Commissioning Support?	N/A
Cabinet member <u>portfolio</u>	Councillor Rob Walker

**Electoral wards affected: All**

**Ward councillors consulted: No**

**Public or private: Public**

**Has GDPR been considered? Yes**

## 1. Summary

The aim of the *Council Owned Tree and Woodland Management Policy* is to set out how the Council will effectively manage and enhance the trees and woodlands for which it is responsible, ensuring that they:

- positively contribute to the area and the achievement of the Council's corporate priorities, helping to create an attractive, healthy environment which maximises the quality of life of our citizens;
- maximising benefits to the wider environment, including contributing towards the Council's response to the climate emergency;
- meet legal obligations; and
- minimise conflict with the public and other land owners.

The accompanying documents *Tree Works on Council Owned Trees Guidance Document* and *Tree Risk Management Framework* provide further detail on how specific tree related issues will be dealt with by the Council, and how it will effectively manage tree related risk.

The White Rose Forest update aims to clarify the planting requirements for the WRF programme and to set out how the council proposes to take the programme forward.

## 2. Information required to take a decision

The total area of woodland within the Kirklees district is approximately 6,199ha or 15.2% of Kirklees district's land area, higher than the national figure of 10.5%. Kirklees Council owned/managed woodlands cover over 600ha (approx. 10% of the woodlands in the district).

Increasing tree cover and effective management of its tree and woodland assets are a key component of the Council delivering its Corporate Plan, in particular *Clean and Green*: enabling both our built and natural environment to contribute to the quality of life of our citizens and making the district a more attractive place in which to live and invest; and helping to connect people and places, improve air quality and be resilient in the face of extreme weather.

There is increasingly strong evidence and a growing consensus that trees, woods and forests have a key role to play in climate change mitigation and adaptation, and in delivery of ecosystem services in both rural and urban areas. As such the Council's commitment to proactive woodland management, increasing tree cover and protection of existing trees is a significant part of its response to the climate emergency. The Council is also committed to contributing towards the 30% increase in canopy cover required by the White Rose Forest programme as part of the wider Northern Forest initiative.

Several previous tree related policies have existed but they have not been comprehensive. A previous version of the Guidance Document has been available on the Kirklees website for some time but some of the information was out of date and it seemed appropriate to review this document in conjunction with the development of the main policy and risk management framework.

The *Council Owned Tree and Woodland Management Policy* sets out a number of policy statements relating to:

- proactive tree and woodland enhancement;
- the protection of existing tree and woodland assets;
- woodland management;
- risk management; and
- conflict and complaints.

The *Tree Works on Council Owned Trees Guidance Document* compliments the main policy by giving more detail on how specific tree related issues and conflicts will be dealt with by the Council, and to clarify the Council's legal obligations in relation to such issues. This includes how

trees will be maintained in different locations and with due regard to the protection of associated wildlife, how decisions relating to tree felling will be taken, and how requests for tree works not required by law will be assessed.

The *Tree Risk Management Framework* focuses specifically on tree related risk. This document aims to assist the Council in exercising its duty of care to both its employees and the public with regard to the safety of trees, and proactively manage risk to its land and property, by maintaining a system of tree inspection and remedial works that is in line with the *Council Owned Tree and Woodland Management Policy* as well as with current nationally accepted standards and industry best practice. A management system is proposed which includes a zone-based inspection regime, both routine and reactive inspections, and a system for prioritising remedial works.

The premise of all three documents is that the Council supports the retention of trees wherever possible and will proactively work to increase tree cover across the district as part of its commitment to the climate emergency and the White Rose Forest programme.

The *White Rose Forest Tree Planting Programme – Scoping Document* proposes an approach to planning White Rose Forest planting which responds both to the climate emergency and to the wider biodiversity crisis, with the following aims:

- To contribute towards an overall increase in tree cover within Kirklees by 30% - including a Council commitment to planting on Council land in the order of 170,000-257,000 trees over 119-180ha.
- To create sustainable and healthy woodlands with good structural diversity supporting a wide range of biodiversity.
- To compliment the diverse use of greenspaces and to visually enhance the natural offer.

### 3. Implications for the Council

- **Working with People**

The great majority of complaints relating to Council owned trees comprise requests for trees to be removed rather than complaints about unjustified removal. Whilst we appreciate that trees can be a source of nuisance the Council's priority is the retention of trees where their removal is not necessary for statutory, safety or tree/woodland health reasons. It is therefore not always possible to act in accordance with residents' wishes, however the Council will adopt a common sense approach with regards to requests it receives for relevant, justifiable and necessary tree works. All requests will be considered individually and the circumstances of the request will be balanced against any environmental impacts before a decision is made. The reasons for the decision will be fully explained to the customer. Where the decision is not to the satisfaction of the customer, the customer has the right to appeal against the action or decision, to which the Council will respond in writing. Requests received in the form of complaints will be dealt with in accordance with the Council's complaints procedures.

Where street tree felling is required for highways works this will not be undertaken without consultation and agreement with all elected ward members and residents on the street will be consulted as appropriate.

In bringing its woodlands back into active management and in planning tree planting programmes the Council will aim to work with elected members, local communities and partner organisations wherever possible to ensure they fit with local needs and to foster greater positive community engagement with and care for our woodlands.

- **Working with Partners**

The intention is for this policy, together with the guidance document and the risk framework, to be peer-reviewed by partner organisations with expertise in tree and woodland management prior to implementation.

We will work collaboratively with ward members and partner organisations wherever possible in implementing the policies and procedures outlined in these documents, in particular where decisions are required about the removal of trees for non-statutory or safety reasons and for significant planning tree planting and woodland management schemes.



- **Place Based Working**

As described above the policy and associated documents allow for ward member, citizen and partner engagement in decision-making about tree related issues where appropriate to ensure that outcomes are appropriate to the geographical area and community in question.

- **Improving outcomes for children**

The Guidance document recognises the value of all green spaces, including woodland, for adventurous play and the vital contribution this makes to children's physical, mental and emotional well-being and development. As such the use of Council woodlands for play is considered, in particular the construction of various home-made items of play equipment such as tree swings, dens and tree houses. It is proposed that such items will be left in woodlands where they are considered to be safe for use. Any items of home-made play equipment encountered in Council woodlands by officers during the course of their work, or reported to the Council by third parties, will be inspected and assessed for safety in terms of their location and construction. If considered dangerous or inappropriate they will be removed within one working day of this decision being made. Structures will only be left in situ if they are considered to be safe for use until the next scheduled inspection of that area in the forestry team's tree inspection programme, as the Council is not able to allocate additional resources to more frequent monitoring of such items. Any decisions made will be documented.

- **Other (eg Legal/Financial or Human Resources)**

All three documents have been reviewed and approved by the Council's insurance team in terms of all content that relates to risk management and potential claims.

#### 4. **Consultees and their opinions**

The three documents presented in this report have been developed by the parks development and forestry teams within Greenspace. They have subsequently been reviewed and amended by the insurance team as well as by Tom Stevenson (Biodiversity Officer) and the planning policy team.

Councillor Rob Walker reviewed the documents on 25<sup>th</sup> September 2019 and proposed amendments which have been incorporated.

#### 5. **Next steps and timelines**

The intention is that the documents will be peer-reviewed by selected expert external organisations as well as reviewed by the following internal teams prior to implementation:

- Highways
- Cemeteries and crematoria
- Kirklees Neighbourhood Housing
- PRP
- Policy and Strategy team

#### 6. **Officer recommendations and reasons**

To endorse the adoption of the *Council Owned Tree and Woodland Management Policy* together with the *Tree Works on Council Owned Trees Guidance Document* and the *Tree Risk Management Framework*, and the approach to White Rose Forest development outlined in the scoping document.

#### 7. **Cabinet Portfolio Holder's recommendations**

Councillor Walker strongly supports the policy and fully recognises the importance of both planting many more trees and managing our trees effectively.

#### 8. **Contact officer**

Rob Dalby, Greenspace Operations Manager, [rob.dalby@kirklees.gov.uk](mailto:rob.dalby@kirklees.gov.uk), ext 77447

**9. Background Papers and History of Decisions**

**10. Service Director responsible**  
Service Director - Environment

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# Kirklees Council

## Council Owned Tree and Woodland Management Policy

### 1. Introduction and Aims

- 1.1 Trees are a hugely important component of the landscape in both the urban and rural parts of the Kirklees district. Trees, whether appearing as individuals, groups or as woodlands, have a very significant effect on our quality of life by providing a range of ecological, aesthetic, social and health benefits.
- 1.2 The total area of woodland within the Kirklees district is approximately 6,199ha or 15.2% of Kirklees district's land area, which is considerably higher than the national figure of 10.5%. Kirklees Council owned/managed woodlands cover over 600ha, representing almost 10% of the woodlands in the district or 1.5% of the land cover.
- 1.3 Increasing tree cover and effective management of its tree and woodland assets are a key component of the Council delivering its Corporate Plan, in particular *Clean and Green*: enabling both our built and natural environment to contribute to the quality of life of our citizens and making the district a more attractive place in which to live and invest; and helping to connect people and places, improve air quality and be resilient in the face of extreme weather.
- 1.4 There is increasingly strong evidence and a growing consensus that trees, woods and forests have a key role to play in climate change mitigation and adaptation, and in delivery of ecosystem services in both rural and urban areas. As such this policy also forms part of the Council's response to the Kirklees Climate Emergency declared in January 2019.
- 1.5 **The aim of this policy to set out how the Council will effectively manage and enhance the trees and woodlands for which it is responsible, ensuring that they:**
  - **positively contribute to the area and achievement of the Council's corporate priorities;**
  - **maximising benefits for citizens and the wider environment;**
  - **meet legal obligations; and**
  - **minimise conflict with the public and other land owners.**
- 1.6 This policy and associated documents are intended to provide guidance for decision-makers across the Council when addressing any issues related to trees and woodlands within Council ownership, as well as for the general public in terms of how requests/complaints relating to trees and woodlands will be dealt with.
- 1.7 A Tree and Woodland Guidance document was adopted by the Council in 2014. This policy and associated documents supersede that document and any other previous Kirklees Council tree policies, strategies and guidelines.

### 2. Scope

- 2.1 The Council's tree and woodland assets are managed by the Greenspace Department.
- 2.2 This policy primarily relates to trees for which the Council is currently responsible, namely those located on Council-owned land within:
  - i. Highway verges
  - ii. Council tenancy housing sites
  - iii. Cemeteries and churchyards
  - iv. Car parks
  - v. Parks and open spaces
  - vi. Woodlands
  - vii. Land vested with the corporate landlord (PRP)
  - viii. The boundaries of Council owned/managed buildings
- 2.3 This policy does not cover trees within private ownership unless the Council has a legal responsibility or power in respect of their management.

### 3. Background

#### **Statutory obligations**

- 3.1 Under section 40 of the Natural Environment and Rural Communities Act 2006 (NERC Act) Local Authorities have a statutory obligation to have regard to the conservation of biodiversity, including restoring habitats and species populations, while exercising their functions.
- 3.2 Further statutory protection to species associated with trees and woodlands are conferred by the Wildlife and Countryside Act 1981 and European Protected Species legislation. Of particular note is legislation relating to bats and their roosts, badgers, and nesting birds.

### ***Benefits of trees***

- 3.3 The benefits of trees have been widely researched and documented, and include:
  - Landscape character: contributing to the physical attractiveness of the district and providing screening for less attractive development, thereby also attracting local investment;
  - Local environment: mitigating noise pollution, providing shelter, stabilising soils thereby reducing erosion, and mitigating flood risk by absorbing water and slowing the flow of water into watercourses
  - Climate change: carbon capture and sequestration;
  - Biodiversity: supporting a multitude of other species of flora and fauna;
  - Physical health: offering shade, trapping particulate matter therefore improving air quality, offering opportunities for physical activity;
  - Mental health and well-being: contributing to attractive green spaces which are well documented to have a positive effect on mental health and well-being;
  - Education and culture: providing an educational resource e.g. for Forest Schools; many specific trees and woodlands have important historic and cultural significance; and
  - Commercial: a potential source of revenue.

### ***Biodiversity and woodland management***

- 3.5 Forests, woods and trees make a major contribution to biodiversity in the UK but lack of management, fragmentation of habitat and climate change can compromise this contribution.
- 3.6 Kirklees contains examples of the following Habitats of Principal Importance, which are identified under section 41 of the NERC Act 2006: Lowland Mixed Deciduous Woodland, Traditional Orchards, Upland Mixed Ashwoods, Upland Oakwoodland, Wet Woodland, Wood-Pasture & Parkland. The list of Habitat (and Species) of Principle Importance is intended to inform the 'biodiversity duty' under section 40 of the NERC Act 2006 (see section 3.1 above).
- 3.7 Many woodlands across Kirklees have been under or not managed for a number of decades, leading to even aged stands of mature, often single species woodland with little regeneration or ground flora. Reinstating active management of many woodlands, together with connecting woodland habitats, is therefore an important component of improving biodiversity across the district, and will demonstrate that the Council is meeting its 'biodiversity duty' under section 40 of the NERC Act 2006.
- 3.8 Trees and woodlands are currently also under threat from a number of specific challenges including Ash Dieback and the effects of climate change, including changes in precipitation, temperatures and the spread of other pests and diseases, which are likely to increase into the future.

### ***White Rose Forest***

- 3.9 Kirklees Council is a key partner in the White Rose Forest initiative which covers the Leeds city region and aims for a 30% increase in tree canopy cover by 2044 as part of the wider Northern Forest programme.

### ***Tree-related risk***

- 3.10 The risk of being struck and killed by a tree or branch falling is extremely low - in the order of one in 10 million for those trees in or adjacent to areas of high public use. The Health and Safety Executive (HSE) views this level of risk as "broadly acceptable", however the public may not perceive the risk to be low following an incident depending on the associated media coverage.
- 3.11 As the owner and manager of trees Kirklees Council owes a duty of care to persons and property who may suffer harm caused by their failure in line with the following legislation:
  - The Health & Safety at Work Act (etc) 1974
  - Occupiers Liability Acts 1957 and 1984
  - The Management of Health & Safety Regulations 1999
- 3.12 As such the Council, as a reasonable and prudent landowner, has a responsibility to have a risk management framework in place which considers the risks posed by its trees, which balances the

risks against the many benefits provided by its trees and woodlands, and which allows it to take actions which are proportionate to the risk and are reasonably practicable.

- 3.13 This subject is discussed in more detail in the *Kirklees Council Tree Risk Management Framework* which accompanies this document.

#### ***Conflict in relation to trees***

- 3.14 Whilst trees are widely recognised for their many benefits they can also be the source of conflict. Frequent causes for complaints to the Council relating to trees include shading, leaf fall, structural damage, interference with utilities/services, and obscuring of views.
- 3.15 Conflict may also arise where third parties undertake works to trees on Council land without prior written agreement from the Council.
- 3.16 Trees owned by third parties may also cause damage to Council land or property on failure, and on occasion private trees may be noted by Council tree inspectors as posing an imminent risk to Council land or property. The Council has powers under the Local Government (Miscellaneous Provisions) Act 1976 and the Highways Act 1980 to require a private individual to make safe a tree which poses an imminent danger.

## **4. Council Policy for the Management of Trees and Woodland**

#### ***Tree and woodland enhancement***

- 4.1 The Council will seek to proactively increase tree and woodland cover in both rural and urban parts of the district, by planning for the replacement of trees projected to be lost through disease and by maximising opportunities to plant trees wherever practicable and sympathetic to local topography, ecology and landscape character and taking into account the avoidance of future conflict with other landowners and users, in conjunction with the White Rose Forest and other initiatives.

#### ***Protection of existing trees/woodland assets***

- 4.2 The Council will not agree to the removal of healthy trees from the environment unless this removal is deemed necessary under the Tree Risk Management Framework or is in line with good woodland management practices, or is otherwise required under other legislation or to implement a planning permission.

#### ***Woodland management***

- 4.3 Where practicable the Council will seek to bring its woodlands back into active management in line with best practice as set out in *The UK Forestry Standard* through the creation and implementation of woodland management plans for sites and through seeking appropriate funding, in conjunction with local volunteer groups and commercial opportunities where appropriate, and ensuring adherence to all relevant wildlife legislation.

#### ***Risk management***

- 4.4 The Council will manage tree-related risk in a proportionate, consistent and effective manner through the implementation of the *Tree Risk Management Framework* which accompanies this document.

#### ***Conflict and complaints - Council and third-party trees***

- 4.5 Requests and complaints from third parties in relation to Council trees will be dealt in accordance with the above policies 4.1-4.4 and the Council's Complaints Procedures where relevant, taking into account the specific circumstances and context of the request or complaint, and including an appeals process against any decision made.
- 4.6 The Council will seek compensation in the form of remedial work to rectify damage and/or full replacement cost values from any external organisation or individual(s) responsible for significant damage to, or removal of, any Council owned tree(s) according to the value as calculated by the Capital Asset Valuation of Amenity Trees (CAVAT) methodology.
- 4.7 The Council will, when identified as part of its own tree inspection programme, notify owners of private trees that pose a measurable and foreseeable risk to the public highway or to Council land of the need to carry out remedial works; in the event of non-compliance remedial

works will be undertaken by the Council, with costs recharged to the tree owner, in line with relevant legislation.

- 4.8 Tree works will not be carried out at the Council's expense on behalf of private tree owners; where essential works are undertaken to rectify damage to Council land or property sustained through the failure of the whole or part of third-party trees the costs of such works will be recharged in full to the owner of the tree or trees in question.

## 5. Procedures and Implementation

- 5.1 The procedures and guidelines to be followed in implementing this policy are set out in the supplementary documents *Kirklees Council Tree Works on Council Owned Trees: Guidance Document* and *Kirklees Council Tree Risk Management Framework*.

### Key References

- Natural Environment and Rural Communities Act 2006 (section 40: duty to conserve biodiversity)
- National Planning Policy Framework (Section 14: Meeting the challenge of climate change, flooding and coastal change; and Section 15: Conserving and enhancing the natural environment)
- Kirklees Council Local Plan (adopted March 2019)
- Trees in Towns II (DCLG, 2008)
- Local Authority Tree Strategies (The Woodland Trust, 2016)
- British Standard BS 5837:2012 Trees in relation to design, demolition and construction - recommendations
- British Standard BS 3998:2010 Tree work – recommendations
- The UK Forestry Standard (the Forestry Commission, 2017)
- The State of the U.K.'s Forests, Woods and Trees (The Woodland Trust, 2011)



# **TREE WORKS ON COUNCIL OWNED TREES**

## **GUIDANCE DOCUMENT** Revised July 2019

**Greenspace  
Kirklees Council  
Flint Street  
Huddersfield**

**Tel 01484 414700  
Tel 01484 225664 (out of hours emergencies)  
Email [forestry@kirklees.gov.uk](mailto:forestry@kirklees.gov.uk)**



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# 1. Introduction

Kirklees Council is responsible for the management of all trees growing on its land including street trees, trees on public open spaces and in woodlands. By law, the Council has duty of care with respect to tree related risk and is also required to manage and undertake work to any tree which constitutes a statutory nuisance. In order to discharge these duties a programme of inspection and maintenance works is in place aimed at keeping staff and the public safe from harm and preserving the health and future wellbeing of the Council's tree stock.

Trees are a hugely important component of the landscape in both the urban and rural parts of the Kirklees district. Trees, whether appearing as individuals, groups or as woodlands, have a very significant effect on our quality of life by providing a range of ecological, aesthetic, social and health benefits. As such the Council is committed to maintaining – and where possible increasing – the level of tree cover across Kirklees. There are, however, a number of conflicts which may arise where the Council's trees are located close to neighbouring properties and the aim of this guide is to set out the Council's policies in dealing with these conflicts and to clarify the Council's legal obligations in relation to such issues.

This guidance document is intended for both staff and the general public. It complements and is intended to be read in conjunction with Kirklees' *Council Owned Tree and Woodland Management Policy* and the *Kirklees Council Tree Risk Management Framework*. This document will be reviewed on a biennial basis by the forestry team within the Greenspace department.

**To contact Kirklees Council forestry team call 01484 414700 or email [forestry@kirklees.gov.uk](mailto:forestry@kirklees.gov.uk) with details of the issues in question together with photographs where possible.** The forestry team works in an advisory capacity to a number of Council Services and any decisions relating to trees will be made by the team in conjunction with the relevant Service.

## 2. Common Law Rights

In the English legal system, Common Law (or civil law) refers to laws that have been developed through precedent set by similar cases as opposed to being created through legislative statutes. Under English Common Law Rights, a property owner has a right to remove (abate) the nuisance associated with trees encroaching onto his/her property. The following advice with respect to encroaching trees is given for general guidance only and property owners would always be advised to obtain independent legal advice before acting.

a) You can only consider removing those parts of the tree from the point where they cross the boundary of your property. You must not go beyond your property boundary without the permission of the tree owner. You have no legal right to cut or remove any part of a tree that does not overhang your property. Any work which you do carry out must be done at your own expense and without unauthorised access to Council land. Kirklees Council has no liability to reimburse any associated costs. If your actions render a tree to be unsafe you may be liable for any subsequent damage that results from tree failure.

b) You are strongly advised to consult a professional tree surgeon for guidance on how best to prune back encroaching trees, unless the works are trivial meaning you could do the works with hand secateurs or similar.

c) You are strongly advised to tell the owner of the trees what you plan to do. You can find out if the trees are owned by the Council by telephoning Kirklees Direct on 01484 414700.

d) Before you consider doing any works to the trees you should find out if they are protected by a Tree Preservation Order or if they are in a Conservation Area. If trees are protected, then you will need to gain consent by making an application / give notice to the Council. For guidance on how to check if the trees are protected and how to make an application please contact the Council's Planning department on [trees.planning@kirklees.gov.uk](mailto:trees.planning@kirklees.gov.uk) or (01484) 221000.

**Any works to Council owned trees or parts of trees on Council land (not private land) require prior written consent from the Council as detailed in Section 5.**



### **3. Maintenance of Council Trees**

Trees are maintained in order to reduce the risk of harm to people and property to an acceptable level and to discharge the Council's duties under law in dealing with a statutory nuisance. Tree maintenance may on occasion be undertaken for other reasons but this is at the discretion of the Council's Greenspace Department. The Council is committed to increasing tree cover across the district and as such the retention of trees will always be the preferred course of action unless there is a clear justification otherwise. Further information on the Council's policies relating to maintenance and management of its trees and woodlands can be found in the *Council Owned Tree and Woodland Management Policy* and the *Kirklees Council Tree Risk Management Framework*.

#### **3.1 Street trees**

Street (highway) trees are defined as trees planted and growing in pavements and road verges along the district's highway network. Such trees are a valuable part of our urban landscape, and the Council will maintain and enhance this urban forest for the benefit of present and future generations.

The Council will endeavour to protect street trees from threats such as loss of and damage to verges, the activities of statutory undertakers and other excavations, and damage from use of road de-icing salt bins or piles being placed around tree root areas. Where utility works are being undertaken within close proximity to highway trees, contractors will be obliged to undertake works in accordance with NJUG 10 v. 4 or any amendments to that document.

The Council will not support the removal of trees for vehicle drop crossings unless the tree can be relocated elsewhere or the tree is of limited life expectancy. All trees removed will be replaced with suitable specimens and all costs for removal and replacement will be borne by the person applying for the drop crossing.

Many of our street trees are now mature and as such it is inevitable that some are removed each year due to age or condition, with other removals unavoidable due to necessary highway and infrastructure improvements. Where street tree felling is required for highways works this will not be undertaken without consultation and agreement with all elected ward members and residents on the street will be consulted as appropriate. Where practicable the Council will always seek to replant new trees to reverse the decline of our urban tree population – more often in grassed verges which are more suited to tree growth. Careful consideration will be given to the species selected and to the placement of trees so as to minimise conflict with other uses of the highway.

#### **3.2 Parks and public open spaces**

Trees in parks and public open spaces are managed to reflect the context of the site and their type, age and condition. Trees in parks generally have more room to grow compared to street trees and usually grow to their full height and spread.

Ongoing maintenance includes removing dead wood, formative pruning (to remove problems in tree form when the tree is young, thus avoiding expensive problems later), removing low branches from pathways and removing trees when they come to the end of their safe and useful life.

Available resources will be used to plant new trees where a need has been identified. Where management plans do not exist, trees will be selected and sited to complement and enhance the park or green space and to maintain tree cover in these areas.

#### **3.3 Cemeteries and closed churchyards**

There are approximately 20,000 cemeteries and churchyards in England, encompassing approximately 10,000 ha of land, representing an extremely valuable ecological resource. Many cemeteries and churchyards contain large specimen trees, the product of a framework of planting undertaken when the

cemetery sites were first laid out. Many trees in cemeteries and churchyards have religious associations, and are also considered to be valuable places that can offer a sense of calm and relaxation, and even exercise, for those persons who choose to access them. In order to protect these trees the Council will ensure that the placement of new graves near trees will be in accordance with the guidance set out in BS 5837:2012 *Trees in relation to design, demolition and construction - Recommendations*.

### **3.4 Kirklees Neighbourhood Housing (KNH) areas**

Individual Council tenancy housing sites and Council estates containing tree populations are situated throughout the district, with many housing properties having trees growing in close proximity. Tree works are included in the Service Level Agreement between Kirklees Neighbourhood Housing and the Greenspace Department. The tenancy agreement on such properties states that: "... the tenant is .... responsible for the upkeep and reasonable maintenance of the garden, including hedges, shrubs and trees (unless the garden area is shared with others)".

The Council does not reasonably expect all tenants to take responsibility for managing large trees within their gardens. All tree related requests from tenants will be considered on their own merits and where appropriate a consultation will be arranged between KNH and Greenspace before a decision is taken. The final decision will rest with KNH, but will be subject to compliance with any relevant planning or legal rules or restrictions.

Where possible the Council will endeavour to incorporate trees into its housing sites by giving careful consideration to the species and placement of trees to minimise conflict with tenants' requirements and other site uses, and where appropriate will consult with tenants on such schemes.

### **3.5 Tree felling**

Tree removal is regrettable but necessary under a number of circumstances. The decision to remove a tree is not taken lightly. Trees are usually felled because it is best option to reduce the risk of harm to an acceptable level (e.g. dead, dying or diseased trees). Such decisions will always be made with reference to the *Kirklees Council Tree Risk Management Framework*.

There are other circumstances where trees may be felled and these are mostly at the discretion of the Council's Greenspace Department, such as where:

- A tree has been proven to be causing subsidence;
- The removal of a tree would benefit surrounding trees; or
- It is the requirement of a management plan to enhance the development of neighbouring trees.

### **3.6 Tree pruning**

Substantial pruning of a tree can allow decay organisms to enter exposed and vulnerable tissues and can also often weaken the structure of the tree. Pruning of a healthy tree will usually cause it to respond by producing vigorous new growth. Older trees do not tolerate pruning as well as younger ones and any substantial pruning can pose significant risk to the survival of a tree particularly in species which are not naturally tolerant of cutting. Pruning should therefore be avoided for reasons other than reducing risk of harm to people or property. Pruning for any other reasons would be exceptional and at the discretion of the Council's Greenspace Department. Further guidance relating to particular circumstances is given in section 4.

### **3.7 Use of green waste**

Unless otherwise agreed, all debris that fits through the Council's wood-chipper will be chipped on site and the resulting woodchip used by the Council. When woodland works are undertaken, all resulting debris, where appropriate, would be left on site either in mulch form or stored as habitat piles within appropriate woodland areas and removal of this would be seen as theft unless written permission is sought from Greenspace.

### **3.8 Tree planting**

In line with the *Council Owned Tree and Woodland Management Policy* the Council supports tree and woodland planting wherever practicable and appropriate. Many problems associated with trees can be avoided by careful, considered design of planting schemes. The principle of “the right tree in the right location” is pivotal in ensuring trees on Council land exist and can grow and mature in harmony with the needs of residents including neighbouring property owners. The appropriate use of trees can transform the visual, amenity, economic and ecological value of an area. Tree planting schemes will always be undertaken with careful consideration of placement, species choice, species diversity and provenance to ensure we create high quality, sustainable landscapes for the future. Careful consideration will also be given to the best means of protecting newly planted trees in each situation.

Procurement of trees and associated materials will be undertaken in line with Council procurement policies and procedures, with the aim of maximising efficiency and quality, and also in accordance with BS 8545:2014 *Trees: from nursery to independence in the landscape - recommendations* or any amendments to that document. Approved and reputable suppliers will be used to ensure quality specimens free from contamination.

### **3.9 Wildlife legislation**

Work to trees has the potential to affect wildlife that receives specific legal protection. Species protection is provided through the Wildlife and Countryside Act 1981, Protection of Badgers Act 1992 and the Conservation of Habitats and Species Regulations 2017. Other legislation relevant to tree work and wildlife includes the Hedgerows Regulations 1997 and the Natural Environment and Rural Communities Act 2006. The Council will adhere to the requirements of all wildlife legislation in the course of undertaking tree works.

Within Kirklees, bats and birds are the species groups most likely to be affected by tree works and as such measures to avoid impacts to these groups are described below. Where those working on trees have reason to suspect other protected species may be affected specialist ecological advice will be sought.

Bats are European Protected Species and in England bats and their roosts are protected through the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017. In undertaking any tree work, the Council will follow the survey protocol described in *British Standard 8596:2015 Surveying for bats in trees and woodland – Guide*, and will, as described in the British Standard, employ the services of a bat specialist where necessary. The specialist will be named on an appropriate bat survey license issued by Natural England. Where a roost or roosts are identified, whether or not bats are present at the time, no works will be undertaken to the tree until such time as a bat mitigation license has been obtained from Natural England.

It is an offence under Section 1 of the Wildlife and Countryside Act of 1981 to intentionally take, damage or destroy the nest of any wild bird while it is in use or being built. As such tree and hedgerow work will be undertaken outside of the bird breeding season (inclusive of March-August) or where this is not possible trees will be inspected for bird's nests prior to work commencing. If active bird's nests are present, no works will be undertaken until all young have fledged, which will be determined through the advice of a suitably qualified ecologist.

## **4. Unsafe Trees**

### **4.1 Unsafe trees - requiring immediate action**

If a Council owned tree is in such a condition that it (or part of it) is at risk of imminent failure in the vicinity of people or property, the Council will attend the site as an emergency as soon as is reasonably practicable in line with its *Tree Risk Management Framework*. If work cannot be completed, areas at risk will be cordoned off until resources are available.

**Any matters of concern in relation to trees should be reported to forestry on 01484 414700 or email [forestry@kirklees.gov.uk](mailto:forestry@kirklees.gov.uk)**

Signs to look for which may mean that a tree is in such condition to warrant immediate emergency action include:

- a) tree is snapped or blown over
- b) tree uprooted but held up by another tree or building
- c) a large branch has broken off or is hanging off the tree
- d) tree or branch is blocking the road or footpath
- e) tree or branch is blocking access to property
- f) tree may, or has already, fallen onto house or car

Signs to look out for which may mean that a tree is a risk to people or property but the risk does **not** require an emergency response:

- a) tree is dead
- b) tree is dying - few leaves in summer or dieback in the crown
- c) bark is loose and falling off
- d) mushrooms or fungi growing on or near the tree
- e) old splits and cracks in the trunk or large branches
- f) smaller branches or twigs falling from the tree

Trees can be made safe via pruning or felling. Typically we would employ the most cost effective approach. For certain high value trees, however, we would consider other options to reduce risk to an acceptable level whilst retaining the tree, including options to reduce the likelihood of the tree failing or the likelihood of persons being close to the tree if it did fail.

#### **4.2 Trees - not requiring immediate action**

Trees that are perceived as at risk of failure but presenting no immediate risk to the public (e.g. in areas of low/no public access) will be inspected and appropriate work undertaken depending on the level of risk identified at the time of inspection.

#### **4.3 Unsafe trees in private ownership**

##### ***Trees NOT within falling distance of the public highway***

Danger posed by trees owned by private parties is principally a matter for such parties to resolve. Private parties should take care of their own responsibilities and hence the Council should not be considered as the first point of contact in attempting to resolve concerns about the danger posed by trees in private ownership. Local Authorities do, however, have the power to require a private individual to make safe a tree which poses an imminent danger via the Local Government (Miscellaneous Provisions) Act 1976. The Council may, therefore, intervene according to the powers given in the Act if an owner of such trees fails to act in a reasonable timescale (timescales depend upon the degree of risk presented) and may recover from the tree owner the expenses reasonably incurred by it in so doing.

##### ***Trees WITHIN falling distance of the public highway***

If a tree in private ownership is reported to the Council and assessed as posing a danger to the highway it will be scheduled for work to make it reasonably safe. The land owner will in the first instance be contacted and instructed to make the tree safe under the Highways Act 1980. The Council may intervene according to the powers given in the Act if an owner of such trees fails to act in a reasonable timescale (timescales depend upon the degree of risk presented) and may recover from the tree owner the expenses reasonably incurred by it in so doing.

## **5. General Works to Council Trees Not Required by Law**

Kirklees Council will refer to the following guidelines when considering requests for work which it is not required to undertake by law. The Council will adopt a common sense approach with regards to requests it receives for relevant, justifiable and necessary tree works; all requests will be considered individually and

the circumstances of the request will be balanced against any environmental impacts before a decision is made. Where the decision is not to the satisfaction of the customer, the customer has the right to appeal against the action or decision, to which the Council will respond in writing. Requests received in the form of complaints will be dealt with in accordance with the Council's complaints procedures which can be viewed at <https://www.kirklees.gov.uk/beta/contact-the-council/complaints-procedure.aspx>.

**In some situations the Council may agree to third parties/volunteer groups undertaking works to trees on its land in order for them to help resolve their own specific issue or as part of a management plan, provided that those works do not compromise the structural integrity of the tree in question.** In such situations all works would need to have prior agreement in writing from the Council and all such works would need to be funded by the third party in question. In the first instance such requests should be directed to [forestry@kirklees.gov.uk](mailto:forestry@kirklees.gov.uk) or 01484 414700 with a proposal of works and justification, and photographs if possible. Details would also need to be provided of the contractor to undertake the work including:

- An up to date copy of their public liability insurance;
- A copy of qualifications relevant to the work proposed - if climbing two operatives trained for rescue and LOLER; if the proposal is a reduction we would need a pruning qualification and if lowering is involved we would need lowering qualification; and
- Risk assessments and method statements for the work.

**Work should not take place until written consent is granted in response to the request.** Any works completed without prior written consent may result in the Council seeking compensation from those responsible in the form of remedial work to rectify the damage and/or full replacement cost values as calculated by the Capital Asset Valuation of Amenity Trees (CAVAT) methodology. Under this valuation system, fines for cutting of a medium-sized tree can amount to approximately £20,000 and a 4 inch branch approximately £200 or more.

### ***5.1 Tree touching a building***

If a tree that is owned or managed by the Council is touching private property (dwelling, house, garage etc.) the Council will take action to remove the nuisance by the most appropriate means.

In many cases the solution will be for the Council to prune the tree, but in some circumstances it may be more appropriate to fell the tree. If pruning is appropriate we will endeavour to undertake works to stop the problem recurring within three years.

### ***5.2 Tree overhanging property***

Kirklees Council will not prune or fell a tree that is owned or managed by the Council to alleviate the nuisance of branches overhanging private property (see section 2).

Non-statutory nuisance caused by overhanging branches may be considered as part of our general tree work programme. However, this programme is discretionary and subject to the availability of funding.

### ***5.3 Tree roots and drains***

Kirklees Council will not prune, fell or cut the roots of a tree that is owned or managed by the Council to prevent roots entering private drains that are already broken or damaged.

Tree roots typically enter drains that are already broken or damaged. Trees themselves very rarely break or damage the drain in the first place. Tree roots found in a drain are usually symptomatic of an underlying problem requiring repair of the broken pipe. If you are concerned about the condition of your drains then you are advised to contact your water and sewerage company. Householders are often responsible for the maintenance of the drains within or on their property.

### ***5.4 Trees blocking natural light***

Kirklees Council will not prune or fell a tree owned or managed by the Council to improve natural light to private property unless it is required by a court order to do so.

Where trees growing naturally within the environment are blocking light into a property there is no legal "right to light". The tree owner is not by law obliged or required to carry out work to the tree(s) for the benefit of level of light to a third party, unless the third party has brought a successful action through the courts demonstrating that a "right to light" exists.

If natural light is being blocked by the growth of a predominantly evergreen hedge then action may be taken to reduce the problem under the High Hedges Act, Part 8 of the Antisocial Behaviour Act, 2003.

Further information should be sought through the Council's Planning department at [trees.planning@kirklees.gov.uk](mailto:trees.planning@kirklees.gov.uk)

### **5.5 Trees blocking views**

Kirklees Council will not prune or fell a tree, or group of trees, owned or managed by the Council to improve the view from private property (including properties managed by Kirklees Neighbourhood Housing).

### **5.6 Leaf fall from trees**

Kirklees Council will not prune or fell a tree owned or managed by the Council to remove or reduce leaf fall or remove fallen leaves from private property.

The loss of leaves from trees in the autumn is part of the natural cycle and cannot be avoided by pruning. The falling of leaves onto a neighbouring property is not regarded in law as a statutory nuisance.

### **5.7 Sap from trees**

Kirklees Council will not prune or fell a tree owned or managed by the Council to prevent or reduce honeydew or other sticky residue falling onto private property.

Honeydew is caused by greenfly (aphids) feeding on the sap from the leaves and excreting their sugary, sticky waste. Unfortunately there is little that can be done to remove the aphid which causes the problem and pruning the tree may only offer temporary relief; any re-growth is often more likely to be colonised by greenfly, thereby potentially increasing the problem. Some trees, such as Limes, are more prone to attack by greenfly and in some years greenfly are more common especially following a mild winter. Honeydew is a natural and seasonal problem. Where new trees are planted we try to choose trees that are less likely to have this problem. Where honeydew affects cars, warm soapy water will remove the substance, particularly if you wash the car as soon as possible.

### **5.8 Blossom from trees**

Kirklees Council will not prune or fell any tree owned or managed by the Council to remove or reduce blossom fall from trees or remove fallen blossom from private land.

Tree blossom usually heralds the start of Spring. Blossom is a natural occurrence, which cannot be avoided by pruning, and is not regarded in law as a statutory nuisance.

### **5.9 Bird droppings from trees**

Kirklees Council will not prune or fell any tree owned or managed by the Council to remove or reduce bird droppings from the tree, or remove bird droppings from private land or property.

Bird droppings may be a seasonal nuisance but the problem is not considered to be a sufficient reason to prune or remove a tree. Nesting birds are protected under the Wildlife and Countryside Act 1981 (and other related wildlife law). Warm soapy water will usually be sufficient to remove the bird droppings.

### **5.10 Fruit, berries & nuts from trees**

Kirklees Council will not prune or fell any tree owned or managed by the Council to remove or reduce the occurrence of fruit, berries or nuts falling onto footways or private land.

Fruit trees such as apple, cherry and pear are welcomed in many locations with the added benefit of providing free food. When considering what tree to plant we do take account of the likelihood of such problems. Equally, where fruit trees are established but there is a significant anti-social behaviour problem caused by the throwing of fruit or nuts we may consider phased removal and replacement with more suitable species.

### **5.11 Wildlife and insects in trees**

Kirklees Council will not prune or fell any tree owned or managed by the Council to remove or reduce incidence of bees, wasps and other insects or wild animals.

Bees are protected species and advice should be taken before considering their removal. You may be able to dispose of individual wasps using an aerosol insect-repellent spray, but this will not control or eliminate the nest itself. Ideally the whole nest should be destroyed. This can be achieved with great caution but it is far safer to use pest control experts. The Council provides a charged service for removing certain pest species. Please telephone Kirklees Direct on 01484 414700 to talk to Environmental Health.

### **5.12 Satellite, television and other communications reception blocked by trees**

Kirklees Council will not prune or fell any tree owned or managed by the Council to enable or ease installation or improve reception of satellite or television receivers.

It may be that your satellite or TV provider will be able to suggest an alternative solution to the problem, for example relocating the aerial/dish or means to boost the signal. Please note that Kirklees Council will not reimburse costs associated with relocating a TV aerial or satellite dish.

### **5.13 Security cameras/sensors blocked by trees**

Kirklees Council will not prune or fell any tree owned or managed by the Council to improve the range or vision of security cameras or similar sensor equipment unless requested to do so by an appropriate statutory authority, e.g. the Police, on the grounds of public safety.

Security of premises is the responsibility of the owner and any system should be installed in such a way as to avoid interference from or with adjoining trees.

### **5.14 Solar collectors and panels obscured by trees**

Kirklees Council will not prune or fell any tree owned or managed by the Council to improve the performance of solar water heating collectors or solar panels such as photovoltaic cells.

Whilst the Council appreciates that there is a need to provide renewable energy resources, trees have an important role in maintaining and improving local amenity, in addition to contributing to local and national targets in tackling climate change. The presence of trees must be fully considered when selecting a suitable location for the placement of solar collectors and panels.

### **5.15 Telephone wires and trees**

Kirklees Council will not fell any tree owned or managed by the Council to remove or reduce interference with telephone wires. However, there may be instances where the Council will undertake works to prune trees and reduce interference where pruning would be an effective measure.

Your telephone service provider may be able to suggest an alternative solution to the problem. However, wires do and can run through trees with little or no effect. Service providers will often install the wires after the tree has been planted.

### **5.16 Tree considered too large**

Kirklees Council will not prune or fell any tree owned or managed by the Council because it is considered to be 'too big' or 'too tall'.

A tree is not dangerous simply because it may be considered too big for its surroundings. Other problems would need to be present, such as those described in earlier sections, in order for the Council to consider it to be dangerous. Kirklees Council does not recognise "crown reduction", "lopping", "topping" or "pollarding" as a general form of management of its trees. Such work can be detrimental to the health and future safety of trees and will only be undertaken in exceptional cases.

### **5.17 Vandalism to trees**

Kirklees Council will investigate any reports of vandalism to any tree owned or managed by the Council and use enforcement and legal action to bring about the prosecution of offenders.

Vandalism includes wanton damage of newly planted trees and any unauthorised pruning, felling or similar work to mature trees.

You are not allowed to remove living material from Council land without consent and unauthorised persons are not allowed to use a chainsaw of any type in parks, public open spaces or on other Council land. If you see someone who may be removing living material without consent (i.e. a person not associated with a relevant sign written vehicle and / or without clothing that clearly identifies who they are) or they are using a chainsaw, please telephone Kirklees Direct on 01484 414700.

### **5.18 Anti-social behaviour and trees**

Where any tree owned or managed by the Council is associated with criminal activity or anti-social behaviour, measures to reduce the problem will be considered on a site by site basis.

Where a tree is associated with criminal activity and/or anti-social behaviour, steps to reduce the problem will typically require the coordination of a number of agencies including the police. Just pruning or felling a tree is not always the answer to the problem. Neglected spaces with overgrown trees and untidy areas can, on occasion, encourage criminal activity and/or anti-social behaviour and the Council's tree and grounds maintenance programme tries to improve these areas by making the local environment cleaner, greener and safer.

### **5.19 Claims of subsidence caused by trees**

Kirklees Council will rigorously identify and defend any claims which are presumed to be false.

If you believe that your property is legitimately suffering subsidence damage due to the action of trees owned or managed by the Council (or that you are concerned about potential damage) you are advised to contact your property insurer (private ownership) or Kirklees Neighbourhood Housing (Council Tenants) in the first instance so that you may discuss your concerns and agree an appropriate course of action. Should you, or those acting on your behalf, wish to make a claim for damages against the Council, alleging that a Council owned/managed tree is causing subsidence damage, then you will be required to submit an independent report to the Council's Insurance Department.

### **5.20 Tree swings, tree houses and other home-made play equipment on Council owned land**

Kirklees Council recognises the value of all green spaces, including woodland, for adventurous play and the vital contribution this makes to children's physical, mental and emotional well-being and development.



As such the Council supports the responsible use of its woodlands for such activities and recognises that at times this may include the construction of various home-made items of play equipment such as tree swings, dens and tree houses.

Any items of home-made play equipment encountered in Council woodlands by officers during the course of their work, or reported to the Council by third parties, will be inspected and assessed for safety in terms of their location and construction. If considered dangerous or inappropriate they will be removed within one working day of this decision being made. Structures will only be left in situ if they are considered to be safe for use until the next scheduled inspection of that area in the forestry team's tree inspection programme, as the Council is not able to allocate additional resources to more frequent monitoring of such items. Any decisions made will be documented.

## **6. Trees Affecting the Public Highway**

### ***6.1 Tree obstructing the highway***

Kirklees Council will undertake work to trees owned or managed by the Council to maintain a minimum 5.2 metres height clearance over the carriageway (associated with a street, road or highway) or at a height deemed suitable by the Highway Authority for the road conditions.

If a privately owned tree is causing an obstruction to a road, powers exist under the Highways Act to make the owner of the tree remove the obstruction. If they do not, the Council could enforce this work and recharge the owner.

### ***6.2 Pavement obstructed or damaged by tree***

Kirklees Council will undertake work to trees owned or managed by the Council to maintain a minimum 2.5 metres height clearance over a pavement associated with a street, road or highway, and 3 metres where there are cycling rights, as per statutory requirements. Any works necessary to prevent an obstruction to the width of a pavement associated with the highway due to the presence of a Council owned tree will be considered on a case-by-case basis. Where a pavement is deformed or damaged owing to a tree or trees the preferred course of action will be remedial works to the pavement to enable the tree(s) to be retained, unless the tree needs to be removed owing to age or condition.

If a privately owned tree is causing an obstruction to a footpath associated with the highway, powers exist under the Highways Act to make the owner of the tree remove the obstruction. If they do not, the Council will do this work and recharge the owner. The majority of trees alongside public rights of way (PROW) will be on private land; where there is a bridleway the clearance required is 4m.

### ***6.3 Line of sight obscured by trees***

Kirklees Council will undertake work to trees owned or managed by the Council to maintain clear lines of sight for traffic and pedestrians at junctions and access points (associated with a street, road or highway).

Standards for visibility vary according to the class of the road and the speed limit in force. If a privately owned tree is causing an obstruction to visibility at a road junction (sight line), powers exist under the Highways Act to make the owner of the tree remove the obstruction. If they do not, the Council may undertake this work and may subsequently recharge the owner of the tree.

The shoots that grow from the base of some trees in Council ownership such as lime trees are removed as part of our tree maintenance programme. The removal of basal shoots for aesthetic reasons is done as and when funds allow or when it is necessary to inspect the base of a tree.

### ***6.4 Signal and signage obscured by trees***

Kirklees Council will undertake work to trees owned or managed by the Council to maintain clear lines of sight for traffic signals and street signage (associated with a street, road or highway).

A tree should not obstruct the vision of an approaching driver. If a privately owned tree is causing an obstruction to a traffic signal or street sign, powers exist under the Highways Act to make the owner remove the obstruction. If they do not, the Council will do the work and recharge the owner.

### **6.5 Street light obscured by trees**

Kirklees Council will undertake work to trees owned or managed by the Council to ensure that street lights are not substantially blocked by the presence of trees.

If a privately owned tree is causing an obstruction to street light, powers exist under the Highways Act to make them remove the obstruction. If they do not, the Council will do the work and recharge the owner.

## **7. Woodland Management**

Kirklees Council owns a significant area – approximately 600 hectares - of woodland estate that comprises ancient woodland, designated local nature reserves and newly planted woodlands.

This woodland provides a number of extremely important functions for the local area including helping to absorb carbon dioxide from the atmosphere as well as reduce the harmful effects of climate change, providing habitats for a wide range of wildlife, providing venues for exercise and recreation and as places where local groups and the general public can engage with the natural environment. As a result the priority for the sustainable management of our woodlands is for their environmental and social benefits rather than purely commercial gains.

To help us achieve sustainable management of our woodlands we will follow specific woodland management guidance provided by **The UK Forestry Standard** and where applicable follow other guidance and best practice recommendations from other nature conservation organisations.

UK Forestry Standard: <https://www.forestresearch.gov.uk/research/the-uk-forestry-standard/>

Following this guidance will ensure that we both meet legal requirements and adhere to good forestry practice, encompassing the following elements: biodiversity, climate change, historic landscape, people, soil and water.

In addition we will ensure our work adheres to both our local biodiversity action plan and the UK Post-2010 Biodiversity Framework, ensuring that priority species and habitats are protected in Kirklees.

<https://www.kirklees.gov.uk/beta/delivering-services/policies-and-strategies.aspx>

# Kirklees Council

## Tree Risk Management Framework

### 1. Introduction

The risk of being struck and killed by a tree or branch falling is extremely low, in the order of one in 10 million for those trees in or adjacent to areas of high public use. The Health and Safety Executive (HSE) views this level of risk as “broadly acceptable” but states, however, that this is a general guide and not a definitive statement of what is reasonably practicable in law.

As the owner and manager of trees Kirklees Council owes a duty of care to persons and property who may suffer harm caused by their failure in line with the following legislation:

- The Health & Safety at Work Act (etc) 1974
- Occupiers Liability Acts 1957 and 1984
- The Management of Health & Safety Regulations 1999

As such the Council, as a reasonable and prudent landowner, has a responsibility to have a risk management framework in place which considers the risks posed by its trees, which balances the risks against the many benefits provided by its trees and woodlands, and which allows it to take actions which are proportionate to the risk and are reasonably practicable.

The risk management framework set out in this document includes a system of inspection for its trees which will enable the Council to have a better understanding of whether or not they pose a foreseeable hazard. In line with guidance from the HSE and the National Tree Safety Group (NTSG) this system will include consideration of the risks to which people and property may be exposed in deciding what level of inspection or examination is reasonable in each situation. The inspection system will also enable the Council to minimise any interruption of sightlines on highways which could result in damage to vehicles and persons and to proactively plan for tree replacement.

This document forms part of Kirklees’ *Council Owned Tree and Woodland Management Policy* and should also be read in conjunction with *Kirklees Council Tree Works on Council Owned Trees: Guidance Document*.

### 2. Aims

This document aims to assist Kirklees Council in exercising its duty of care to both its employees and the public with regard to the safety of trees, and proactively manages risk to its land and property, by maintaining a system of tree inspection and remedial works that is in line with its *Council Owned Tree and Woodland Management Policy* as well as with current nationally accepted standards and industry best practice.

The system described in this document includes four components:

- “zoning” of sites in order to enable prioritisation of routine tree inspections;
- scheduled (routine) inspections for trees at a frequency determined by their zone;
- unscheduled (reactive) inspections for trees reported to be of concern in both emergency and non-emergency situations; and
- a system for identifying and prioritising required remedial works according to the inspector’s assessment of a tree.

### 3. Scope

In line with the *Council Owned Tree and Woodland Management Policy* this document concerns trees in the following locations which are managed by the Greenspace Department:

- Highway verges
- Council tenancy housing sites

- Cemeteries and churchyards
- Car parks
- Parks and open spaces
- Woodlands
- Land vested with the corporate landlord (PRP)
- The boundaries of council owned/managed buildings

#### 4. Site Categorisation (Zoning) and Scheduled (Routine) Inspections

In line with HSE and NTSG guidance trees will be categorised into a number of “zones” for the purposes of prioritising inspections according to the following dimensions of tree related risk:

- the likelihood of failure of the tree or part of the tree (e.g. presence of known structural faults);
- the value of the targets (persons, property etc.) present and frequency of presence within falling distance; and
- the severity of impact should failure occur (e.g. size of tree or part that fails).

Trees and groups of trees will be allocated one of four zones with an associated inspection frequency varying from 18 months to never. The allocated inspection frequencies allow for trees to be inspected in different seasons to allow a better assessment of tree health. Zones will be allocated by the forestry team with agreement from the relevant Service and recorded in the Council’s tree management software, Ezytreed.

Zone	Examples of trees/tree groups in zone	Minimum inspection frequency
1	<ul style="list-style-type: none"> <li>• All trees within falling distance of arterial or main roads (unless other factors such as tree size mean the trees should be in zone 2, 3 or 4).</li> <li>• All trees in places where there is frequent public access e.g. in and around picnic areas, children’s playgrounds, popular footpaths, other high use areas in parks/recreation grounds, car parks, communal areas within cemeteries (unless other factors such as tree size mean the trees should be in zone 2, 3 or 4, or inspected on a bespoke frequency).</li> <li>• Trees in places where failure would cause damage to high-value property (unless other factors such as tree size mean the trees should be in zone 2, 3 or 4).</li> <li>• Trees with known structural faults where a decision has been made to retain the tree in question due to its importance for habitat, landscape, cultural or amenity reasons.</li> <li>• Tree species or groups of trees affected by known pests or diseases which would normally fall into zone 2.</li> </ul>	18 months
2	<ul style="list-style-type: none"> <li>• Normal use parks and open spaces, normal use woodland paths, trees beside private gardens (unless other factors such as tree size mean the trees should be in zone 3 or 4).</li> <li>• All trees within falling distance of secondary residential roads (unless other factors such as tree size mean the trees should be in zone 3 or 4).</li> <li>• Tree species or groups of trees affected by known pests or diseases which would normally fall into zone 3.</li> </ul>	3 years
3	<ul style="list-style-type: none"> <li>• Trees within low usage areas (unless other factors such as tree size mean the trees should be in a higher or lower zone).</li> </ul>	5 years
4	<ul style="list-style-type: none"> <li>• Trees in sites with no public access.</li> <li>• All young trees, generally below 5 m high and planted in the last 10 years.</li> </ul>	No routine inspection

The recommended inspection frequencies detailed above provide a guideline for the initial cycle of inspections. Inspectors may recommend adjustments to the inspection frequency for a tree or group of trees on completion of each inspection allowing fine-tuning of the categorisation process. In some circumstances inspections may be recommended on a much more frequent basis than every 18 months, in particular in the case of trees with known defects where a decision has been made to retain them due to their importance for habitat, landscape, cultural or amenity reasons.

## **5. Unscheduled (Reactive) Inspections and Emergency Procedures**

Inspections of individual or groups of trees within sites may be necessary outside of the scheduled inspection system following enquiries from the public, ward members or other officers and may occur in both emergency and non-emergency situations. Staff working on the ground on sites, such as gardeners on parks sites and housing officers on KNH sites, will be given basic guidance on identifying tree related problems as part of their day-to-day work and will be instructed to report any concerns to the forestry team in Greenspace. Similar guidance will also be available to the public as part of the document *Kirklees Council Tree Works on Council Owned Trees: Guidance Document*, Section 4.

Once a report is received by the forestry team it will be recorded in the Ezytreev system and scheduled for an inspection as soon as this is deemed necessary and practicable. The subsequent inspection and any works required will be dealt with in accordance with the standard procedures set out in the remainder of this document.

Out of normal office hours (Mon-Fri 9am-5pm) all tree related emergencies should be reported to the out of hours team on 01484 225664. An inspection will take place as soon as is reasonably practicable and, if required work cannot be completed immediately areas at risk such as roads, footpaths, or areas of parks or other green spaces will be cordoned off until resources are available. Where emergency situations are reported, inspections and works relating to these situations will take priority over scheduled inspections and tree works. Where necessary to prevent harm or damage to persons or property the forestry team will notify the emergency services and any relevant statutory bodies or utility companies (Yorkshire Water, United Utilities, Environment Agency, Network Rail etc.) affected by the situation. All details of the inspection and works undertaken will be recorded in the Ezytreev system.

## **6. Inspection Practice**

All inspections will be undertaken by trained and experienced staff who hold a recognised award/certificate such as the Professional Tree Inspection award, National Certificate or Diploma in Arboriculture or have equivalent professional experience. Best practice will be maintained through training and other ongoing continual professional development. All tree inspectors will have access to a range of professional diagnostic tools as follows:

- an inspection toolkit that includes: nylon hammer; binoculars; compass; VTA field guide; probe; knife & hand lens;
- access to a digital camera; and
- a tablet computer with tree management software (Ezytreev).

Initial inspections may be undertaken on foot or in a vehicle with the aim of assessing the general condition and level of risk within an area of trees whilst identifying obvious hazards that exist. In the context of these inspections a defect is defined as a structural, health or environmental condition that could predispose a tree to failure. Such inspections will comprise a general assessment of the tree cover within the area from ground level, generally by passing along existing footpaths or access routes, boundaries and edge trees. Any trees requiring works will be recorded and any trees exhibiting signs of decline, disease or structural instability will be subject to a closer visual assessment. If no external signs of decay, structural weakness or unexplained adaptive growth are evident during this process then no further action will be taken.

Trees that appear to present no unreasonable hazard during their inspection will, under normal circumstances, not be documented in terms of their condition. Any omission from the record therefore

implies that their hazard level is considered negligible. Trees that are considered to pose an unreasonable hazard and therefore requiring remedial works, or those requiring further investigation, will be documented in Ezytreev. All remedial works recorded in the Ezytreev system will be actioned according to the procedures set out in section 7.

In cases where potential defects are suspected but the inspector feels that further investigation is required before making a decision on the required action, details of the tree will be placed on Ezytreev and recommended for further monitoring which could include:

- re-inspecting the tree at a later date, such as during a different season;
- carrying out an climbing inspection;
- asking for a second opinion from another member of the forestry team.

Any further investigations undertaken will be recorded in Ezytreev.

## 7. Remedial Works

Remedial works identified through either scheduled or unscheduled inspections will be allocated a priority level and a target response time according to the inspector's assessment of risk in line with the dimensions of risk set out in section 4 above. Target response times apply from the point at which the forestry team have inspected the tree.

Work requirement	Priority level and target response time*
Urgent	Urgent (within 3 working days)
Essential	Priority (within 10 working days)
	Standard (within 8 weeks where practicable)
Desirable	Low priority (as and when practicable)
None	No works planned

*\*Please note that these are target response times only and timescales may need to be extended in the event of unforeseen events such as major storms.*

All works will be completed by qualified arboriculture staff within the forestry team or by external suitably qualified contractors managed by the forestry team. All tree work will be carried out in line with current British Standards, namely BS 3998:2010 [Tree work - Recommendations], or any subsequent amendments to that document.

## 8. Recording and Data Storage

Records will be made and retained of all inspections undertaken using the Council's password-protected tree management software system, Ezytreev. These records will include the following information:

- Date of inspection
- Name of inspector
- Site details including clear information on hazards detected
- Details of trees including species and condition
- Recommendations
- Previous tree work undertaken
- Details of enquiries or complaints relating to trees on the site

Personal data will be stored in line with the General Data Protection Regulations (GDPR). Such data will be stored securely, accuracy will be maintained, and it will only be retained as long as it is relevant.

A failure log will be maintained as part of the system. Events such as tree failures will be recorded as soon as practicable after they occur. Such information is important for identifying the cause of the failure and can help in prevention of similar incidents in future. The log will be updated after all storm occurrences and other events such as one off failures or incidents involving trees.

## 9. Monitoring and Review

This document will be subject to a biennial review and update from Greenspace. The review will include:

- Checks to ensure that the practice is in line with the Framework
- A review of resource issues
- Existing strengths and weaknesses of the Framework and recommended alterations

### **Key References**

*Hazards from Trees: A General Guide* (The Forestry Commission, 2000)

*Common Sense Risk Management of Trees* (National Tree Safety Group/The Forestry Commission, 2011)

*Management of the Risk from Falling Trees Or Branches* (Health And Safety Executive, 2013)

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# Kirklees Parks and Greenspace

## White Rose Forest Tree Planting Programme – Scoping Document

### 1. Introduction and Aims

Kirklees Council is committed to the White Rose Forest concept, which aims for an increase in tree canopy cover by 2044 of 30%, as part of its wider commitment to the climate emergency. This document aims to clarify the planting requirements for the programme and to set out how the Parks and Greenspace Department proposes to take the programme forward.

#### ***Programme aims:***

**To contribute towards an overall increase in tree cover within Kirklees by 30%.**

**To create sustainable and healthy woodlands with good structural diversity supporting a wide range of biodiversity.** *We feel that it is very important that our approach to the White Rose Forest tree planting programme addresses both the climate emergency and the biodiversity crisis, with new tree and hedgerow planting planned as part of a matrix of wildlife rich habitats across the district.*

**To compliment the diverse use of greenspaces and to visually enhance the natural offer.** *People's access to and engagement with our greenspaces is of huge importance to their physical and mental health and to support healthy communities. In many cases trees can add to the amenity value and aesthetics of our green spaces but we need to make sure we do not compromise the ability of our spaces to support our communities by planting trees everywhere.*

### 2. Overview of requirements

#### **30% requirements for tree cover for Kirklees district:**

- Total area of woodland in Kirklees district **6199ha** (as measured by recent fly over data, Bluesky International Ltd)
- Increasing this by 30% would require **1860ha** of new planting (approx. 3100 football pitches)
- Approx. 2,657,143 feathered whips at 3.5m planting (*we would like to plant at a wider spacing than as previously been undertaken for block woodland to allow healthy growth and reduce thinning requirements*)
- Approximately 265,714 trees per year 2020-2030 to achieve full canopy cover by 2044

#### **Possible Council contribution towards overall totals**

- Total area of woodland owned by Kirklees Council approximately 600ha -
- Increasing this by **30%** would require **180ha** of new planting (approx. 300 football pitches) or **257,143 feathered whips** at 3.5m centres

OR

- Kirklees Council (not including Ramsden estate) 2,614ha as compared with total district area of 40,890ha - Council owned land represents approximately 6.4% of district land. With Ramsden estate included the total Council land holding is 3,755ha (9.2%).
- A proportional Council contribution towards the overall tree planting total required in the district would be **119ha (c. 170,057 trees @ 3.5m centres**, or 17,006 per year 2020-2030) or including the Ramsden estate land **171ha (c. 244,457 trees @ 3.5m centres**, or 24,446/year).

### 3. Programme planning and site identification

Three work streams:

- Parks and Recreation Grounds (land vested with Kirklees Parks)
- Other Kirklees owned land areas vested with other services, e.g. corporate landlord
- Private landowners - supporting to enable planting on their land

Parks and Receptions Grounds: possible planting patterns

- Avenue lined footpaths
- Standard tree planting
- Community orchards
- Smaller copse planting areas
- Native hedge planting around boundaries

#### **Site selection**

Key considerations for site selection:

- Links to White Rose Forest priority areas – Greenstreets, Landscapes for Water etc.
- Links to existing habitat networks. *Should aim to improve the connectivity of natural sites.*
- Links to existing woodland
- Links to ancient woodland
- Open Land survey assessment data – to identify local deficiencies in woodland/natural and seminatural greenspace
- Proximity of housing - be mindful of potential issues of planting too close to residential properties - design out future problems
- Site survey - Existing important/priority habitats or other important cultural uses
- Other site uses/users – for example sports pitches, dog walking, playable space

Site selection on KC land:

- Strategic mapping/data processing exercise

- Corporate landlord (PRP) land – identify low value sites which could be released for planting -
- Engagement with ward councillors, partner organisations and the public - to suggest sites

#### 4. Planting design

- Creation of structurally diverse functioning woodland habitats
- Woodland areas should form part of a mosaic of different habitat types rather than blanket single age coverage – look at staged planting, using smaller shrub species, consider under planting with herb layers, and planning in open areas, glades and rides.
- Tree stakes and guards have proved problematic in some planted woodland area so consider not using them unless site conditions warrant it.
- Consider likely future management – this may be minimal so plan for non-intervention practice - planting at wider spacing to reduce the need for thinning
- Planting of hedgerows, copses and shelter belts to be considered
- Species selection – native species – possible changes/allowances due to climate change e.g. use of drought tolerant species

Tree planting densities (taken from *Woodlands: a practical handbook* (BTCV, 1988))

Tree planting formula;  $2N=A/d$

N - number of trees

A - Area of land

d - distance between trees

Spacing of trees dependant on size at planting

- Feathered whip approx. 3.5m - ideally using cell grown whips
- Standard 275 -300cm = 10m plus – high establishment resource requirements so only use where really needed

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**Name of meeting: Economy and Neighbourhoods Scrutiny Panel**

**Date: 10<sup>th</sup> October 2019**

**Title of report: Preventing Homelessness & Rough Sleeping Strategy 2018-23 - Update**

**Purpose of report: To provide an update on the approach being taken with key partners to develop and implement action plans which support the achievement of outcomes as set out in the Strategy.**

<b>Key Decision - Is it likely to result in spending or saving £250k or more, or to have a significant effect on two or more electoral wards?</b>	<b>Not Applicable</b>
<b>Key Decision - Is it in the <u>Council's Forward Plan (key decisions and private reports)?</u></b>	<b>No</b>
<b>The Decision - Is it eligible for call in by Scrutiny?</b>	<b>Not Applicable</b>
<b>Date signed off by <u>Strategic Director</u> &amp; name</b>	<b>Karl Battersby - 30.09.19</b>
<b>Is it also signed off by the Service Director for Finance IT and Transactional Services?</b>	<b>Not Applicable</b>
<b>Is it also signed off by the Service Director for Legal Governance and Commissioning Support?</b>	<b>Not Applicable</b>
<b>Cabinet Member: Housing and Democracy</b>	<b>Cllr Cathy Scott</b>

**Electoral wards affected: All**

**Ward councillors consulted: None**

**Public or private: Public**

**Has GDPR been considered? Yes.** There is no information in the report which would identify any individual person

## **1. Summary**

1.1 The Kirklees Preventing Homelessness and Rough Sleeping Strategy 2018 – 2023 was approved by full Council on 17<sup>th</sup> July 2019. In creating the strategy, a number of stakeholders including partners from both the statutory and third sector were engaged, and their views helped to shape the end product. As required by the Government in its Rough Sleeping Strategy, the Council's updated strategy has been published on the Kirklees website.

1.2 The Council requested that an initial action plan be created to focus on the first 3 years of the strategy. It is understood that whilst the strategy was approved by Council, to be successfully implemented, the actions need to be created and owned by a range of partners. Progress developing the shared action plan is outlined in the report.

1.3 The Council has been successful in a number of bids it has submitted to the Ministry of Housing, Communities and Local Government (MHCLG) for:

- Funding to develop and further enhance the work on preventing homelessness and tackling rough sleeping. As at May 2019, the total amount awarded from MHCLG Rough Sleeping pot was £248,421.
- Funding to improve access to the private rented sector for those homeless with low housing need. The Council was awarded £10,000 from the Private Rented Sector Access Fund.

A more detailed breakdown of this funding, and how it is being used in Kirklees is given at 2.2 of this report.

1.4 Information on the key indicators and outcomes for people who are threatened with or who are homeless or rough sleeping is given at 2.3 of this report.

1.5 Severe Weather Emergency Protocol (SWEP) arrangements for the 2019-20 winter period are in place and from 1<sup>st</sup> October 2019 can be activated.

## **2. Information required to take a decision**

No decision is required. However, the following information sets out in more detail the approach being taken to develop the action plan and progress to date on implementing new initiatives and outcomes for people.

### **2.1 Action Planning**

2.1.1 Working particularly with the Kirklees Homelessness Forum, and with our housing colleagues we have collated the shared commitments to action that are already set out in the Strategy and are now working on collectively developing the detail of this as a Partnership. A Task and finish group has been set up as a subgroup of the Kirklees Homelessness Forum to develop and drive forward the Strategy Action Plan.

2.1.2 The Safer Kirklees Partnership is developing a suggested framework for how, as a partnership, we respond to concerns around people on the streets including people who are begging, street drinking, and or rough sleeping. This will then be tabled as a draft discussion paper with Elected Members and agreed approaches in relation to rough sleepers woven into the action plan.

## **2.2 New Proactive Outreach Approach (£248,421 MHCLG Funding)**

To support people who are homeless and or sleeping rough in Kirklees, a new proactive approach is being established, with staffing resources being funded through our successful bids to MHCLG. This more outreach focussed service and the progress we are making has been well received; we have a joined-up approach of working with our partners including internal, voluntary and charitable organisations and the Police.

### **2.2.1 Rough Sleepers Initiative (RSI) and Rapid Rehousing Pathway (RRP)**

The RSI funding of £131, 250 and RRP funding of £117,171 is being used to fund a new temporary Rough Sleeping Team within the Housing Solutions Service. The team comprising a Team Manager and 5 Housing Solutions Officers was established between May and September this year. The focus of the team is very much on a holistic approach to working with rough sleepers, based on developing relationships and building trust and formulating plans based on the individual's own circumstances. The team aim to provide ongoing and consistent contact to minimise the individual having to deal with a range of different people and will offer support with finding and keeping accommodation and accessing support services.

The new team and proactive approach has been well received and is already working closely with partners, co-working cases in some instances. To date, the team is actively working with 21 people (19 male and 2 female) 14 are still on the street but others have accepted either temporary accommodation or have been placed in long term accommodation and are still being supported. Of the 21 people 15 have substance issues and 8 have an offending history.

It is anticipated that as a result of closer partnership working and the now monthly Multi Agency Partnership meetings held in north and south Kirklees that the number of rough sleepers to be reported in November 2019 will be higher. This is due in part to the fact that we have greater confidence in capturing information and data of actual rough sleepers across all of the Kirklees area.

At the monthly meetings intelligence is shared and personalised plans for people formulated. The aim is to provide a holistic approach to the person and not just focus on accommodation as we know accommodation alone cannot tackle these issues. These plans are reviewed regularly.

The agencies in attendance are:

- KC Housing Solutions Rough Sleeper Team
- Police
- Chart (Drug and Mental Health),
- The Mission,
- One Big Family,
- Simon on the Streets,
- NHS (Mental Health)
- Safer Kirklees.

The Council contributed to the development of the "Good Practice in Street Outreach" Guide, produced and recently published by a range of third sector and statutory partners under the overall Kirklees Homelessness Forum. The aim of the guide is to bring together in one place a common set of standards of good practice in street outreach for people who are homeless and rough sleeping, and other groups of people on the streets in Kirklees who are vulnerable. (Attached to this report for information)

### 2.2.2 Other Partnership Working - Sex Workers

Part of our scope is to identify and support the 'hidden homeless' specifically women involved in sex work. Links have now been made with the partnership approach already established in the SWEET Project run by Locala. This work aims to improve how we engage with, and support sex workers, into settled accommodation.

### 2.2.3 Other Partnership Working - Hospitals and Prisons

Initial discussions have been had with Accident and Emergency Departments to discuss the effectiveness of the Hospital Discharge Protocol. This includes the processes around people who are at risk of being homeless and are being discharged from hospital. A similar approach is being taken with prisons, where ex-offenders are to be released into Kirklees. This work is in its early stages but it is expected that robust procedures will be in place by May 2020.

### 2.2.4 Other Partnership Working - Police Liaison & Diversion

A solid working partnership with this team based within the Police has been established. They work with the prolific offenders who have substance misuse, homelessness and mental health issues. They are a team dedicated to get to the underlying issues of the individual.

### 2.2.5 Access to the private rented sector

In March 2019, the Council was awarded £10,000 by MHCLG following our successful bid to the Private Rented Sector Access Fund. This money was made available by MHCLG, to enable local authorities to provide support to people who are homeless, or at risk of homelessness, to access and sustain tenancies specifically in the private rented sector.

Through this funding, we commissioned Fusion to develop and provide the Tenant Finder Plus scheme. This scheme is aimed at single homeless households who do not have additional significant support needs and who can manage their tenancy independently, once help has been provided to find appropriate accommodation. Where Tenant Finder Plus is identified as a suitable option to meet someone's housing need, and this is agreed as part of the individual's Housing Action Plan, Housing Solutions will refer onto Fusion and the scheme.

The service has been commissioned on a "payment by results" basis. This means that Fusion are paid where they evidence the successful completion of agreed outcomes. The first agreed outcome is that Fusion will work with both the individual and private landlords to secure a suitable private tenancy. Wherever possible, this will be an assured shorthold tenancy for a minimum period of 12 months.

Fusion Housing Tenant Finder Plus staff maintain regular contact with the individual over the 12 months, in order to ensure that the tenancy is being successfully maintained, and that at the end of the 12-month period, the individual remains in settled and secure accommodation. This is the second agreed outcome, and again, Fusion will provide evidence that the outcome has been met.

Tenant Finder plus has been operating since 1st April 2019 during which time 91 people who were homeless or at risk of becoming homeless have been referred. The scheme will continue to accept referrals up until March 2020, in line with the funding timetable.



## **2.3 Severe Weather Emergency Protocol (SWEP)**

SWEP procedures are in place and will be activated as and when necessary from the 1st of October.

SWEP provides a safety net for those people sleeping rough or in danger of rough sleeping to minimise the risk of death or significant harm caused by extremely cold weather conditions. Access to a bed is made easier for individuals when temperatures are forecast to fall to zero degrees centigrade or below for three consecutive nights. In addition to a bed for the night, those referred by our Rough Sleeper team will have access to shower facilities and TV/computer from 5pm until the next morning. Each person will be provided a meal voucher for breakfast at the Huddersfield Mission where they will be met by a member of our Rough Sleeping team who will support the individual with their longer-term solution.

The Figures for SWEP last year was 43 people that were placed in accommodation and actively worked with.

This winter, we can apply for further Cold Weather Funding from the Government. For Kirklees Council this could be up to £50,000. Housing Solutions are currently exploring the possibility of providing a 'night shelter' facility for those sleeping out.

## **3. Implications for the Council**

### **3.1 Working with people.**

The priorities within the Action Plan are centred on working with people affected by homelessness, including where they are sleeping rough, enabling and empowering them to develop the skills, resilience and improvements in their health and wellbeing that they need to move on to a more settled, happy and stable situation. It recognises people's strengths and capacities for change, as well as identifying how their support needs can best be met.

### **3.2 Working with Partners**

The strategy and action plan have been developed in close partnership with the multi-agency Kirklees Homelessness Forum. It is recognised that ownership of the preventing homelessness agenda must be partnership based, across the Council and its partners. The Council cannot prevent homelessness on its own, partners play a vital role in preventing and responding to homelessness.

### **3.3 Place Based Working**

In addressing issues of homelessness and rough sleeping, a Place Based approach is needed. This includes consideration of peoples support networks and where and how they access services.

Historically, an individual has always had to present as homeless at the Council's Customer Service Centre. This can often create barriers. Our Outreach workers now carry out regular drop in's with our partners at their premises, encouraging engagement from individuals at a place they may feel more comfortable. This has worked well as we have been able to provide advice and guidance flexibly at that crucial time.

### **3.4 Improving outcomes for children**

The strategy's focus on early intervention and prevention of homelessness will lead to improved outcomes for all households who are at risk of or experiencing homelessness, including households with children, and young people.

### **3.5 Other (e.g. Legal/Financial or Human Resources)**

Not Applicable

### **4. Consultees and their opinions**

Not Applicable

### **5. Next steps and timelines**

To continue to develop the action plans and partnership working which support efforts to prevent and tackle homelessness and achieve the outcomes set out in the Preventing and Homelessness Strategy.

### **6. Officer recommendations and reasons**

The comments of the Economy and Neighbourhoods Scrutiny Panel on the approach and progress made to date in developing and implementing actions to address homelessness and tackle rough sleeping are noted. Such comments and suggestions for enhancing the action plans will be explored further with partners and used to shape future actions aimed at achieving the outcomes for people set out in the Strategy.

### **7. Cabinet Portfolio Holder's recommendations**

The comments and views of the Economy and Neighbourhoods Scrutiny Panel are welcome in helping to strengthen and inform the actions that will help us achieve our overall strategic vision which is that 'Kirklees is a place where no one sleeps rough on our streets, where no one is excluded, and where the support to prevent homelessness, or end it as quickly as possible, is available for people for as long as they need it.'

### **8. Contact officer**

Helen Geldart, Head of Housing Services  
Tel: 01484 221000 and ask for Helen Geldart  
Email: helen.geldart@kirklees.gov.uk

### **9. Background Papers and History of Decisions**

Economy and Neighbourhoods Scrutiny Panel 17.1.19 - Rough Sleeping Strategy 2018-23  
<https://democracy.kirklees.gov.uk/ieListDocuments.aspx?CId=572&MId=5711>

Kirklees Cabinet 19.3.19 - Draft Kirklees Preventing Homelessness and Rough Sleeping Strategy  
<https://democracy.kirklees.gov.uk/ieListDocuments.aspx?CId=139&MId=5613>

Kirklees Council 17.7.19 - Preventing Homelessness and Rough Sleeping Strategy 2018-19  
(reference from Cabinet)

<https://democracy.kirklees.gov.uk/ieListDocuments.aspx?CId=138&MId=6024>

10. **Service Director responsible**  
Naz Parkar, Growth and Housing

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# Good Practice in Street Outreach

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Constantly improving standards of street outreach  
to support and protect rough sleepers in Kirklees







## About this guide

This guide is developed, promoted, updated and supported by the homelessness sector in Kirklees, with the aim of creating a common standard of good practice in street outreach for homeless rough sleepers and other vulnerable people.

This guide alone will not end rough sleeping, but we hope it can serve as a call to action, reminder and resource for new and existing groups who want to contribute to this goal. While not everyone you encounter on street outreach will be a rough sleeper/homeless, people may still be vulnerable and in complex situations.

We recognise and value the diversity of backgrounds, motivations and approaches within street outreach in the district, as well as the mission we all share: to ensure all those rough sleeping can access support in the most effective way possible.

A range of voluntary, charitable and statutory partners participated in the development of this Guide under the umbrella of the Kirklees Homelessness Forum.

*Thanks*



We were helped and encourage by Homeless Link.

A list of organisation who have signed up to the Good Practice Guide can be found on the back page.



# By signing up to this guide, we agree to:

## 1. Protect the safety and dignity of the people we support by:

- Being sensitive to the complexity of issues faced by people rough sleeping
- Considering both short and long term needs
- Being mindful of the impact support can have, and avoiding over-promising, re-traumatising or creating dependence
- Providing support that is open to all, with as few conditions as possible, so it is available for those who need it when they need it
- Respecting the boundaries that they put down
- Never putting personal information about people – including their picture – into a public forum, in recognition that there are times when people may not recognise their own vulnerability or risks that such an action may present at any point in their futures

## 2. Protect the safety of our staff and volunteers by:

- Only taking on activities within our capability and knowledge
- Sharing knowledge and accessing training relevant to our key activities
- Paying attention to relevant safeguarding concerns and talking to other active groups to share ideas on minimising risk
- Assessing the risks to our staff and volunteers and taking appropriate actions to minimise them

## 3. Respect our legal and regulatory obligations by:

- Registering with Environmental Health if serving food and securing appropriate hygiene certification
- Getting the appropriate insurance for our activities and structures, including public liability insurance as a minimum
- Following applicable laws and guidance for charities and non-profit organisations

## 4. Address stigma and public understanding by:

- Promoting positive stories of how people can help rough sleepers
- Being clear about what homelessness/rough sleeping is and is not (in line with our stated definition)

## 5. Co-operate with our partners to ensure support is as effective as possible by:

- Using the Street Link website and app to connect people rough sleeping to the housing support team and encouraging access to temporary accommodation where possible
- Staying informed about the support options available for the people we support and making use of referral routes
- Participating in the Homelessness Forum and other partnership activities

## Guidelines for volunteer's

### ■ BE PREPARED

dress appropriately and make sure you can give your time without interruptions.

### ■ BE SAFE

make sure that you remain with your group at all times and follow safety procedures.

### ■ BE REALISTIC

you can make a difference to individuals you meet by providing information and support but you may not be able to solve the problems that have led them to sleeping rough.

### ■ BE RESPECTFUL

to people's personal space and privacy by not photographing, recording or doing anything that could lead to them being identified publicly.

### ■ WORK TOGETHER

by making sure that you report (with consent) all rough sleepers to the appropriate agencies and encourage individuals to seek the help they need to resolve the problems that have led to them rough sleeping.

## Things to consider when undertaking street outreach work:

- Always ask if the person is in touch with any other groups/ organisations. If they are, it may be counterproductive and intrusive for you to get involved. Instead, asking the person for permission to contact the other group and work together with them may be a more effective way to provide support.
- Recognise power dynamics inherent in street work and continually question why you are engaged in a particular activity. Is it helping? Are your own motivations getting in the way of providing the support the person wants?
- Before engaging in street work, take time to find out who you can refer people to for all the things you aren't able or qualified to provide. This is particularly important for legal, immigration and medical advice - if you provide this without appropriate qualifications you may be breaking the law.
- Agree safety and safeguarding procedures and tactics for exiting risky situations, and ensure staff/volunteers know what these are.
- Produce a list of useful numbers for staff/volunteers to carry, including others in your group who people can get in contact with and referral routes for key partners.
- Don't deviate from normal activity, by for instance meeting people out of hours, holding cash or giving someone a lift, unless you have considered the risks in advance and put safeguarding measures in place such as use of the ORBIS app.



# Emergency Response procedures

When emergency's happen, it is worth knowing up front what your response might be.

To save a life or prevent immediate harm the most appropriate course of action is likely to be to phone 999, and then for you to decide if it is safe for you to remain in the situation.

Alternatively, call 111 when it is not an emergency but someone needs medical help fast.

Consider in advance how you would respond to these specific situations and whether anyone in your group has/could get appropriate training, qualifications or experience to know how to deal with them:

- **When a person is non-responsive or has taken an overdose?**
- **If there has been a violent altercation between people you are working with?**
- **If a person is at risk to themselves or expressing suicidal thoughts?**
- **If a person is injured?**

Some useful contacts for other specific groups who may be in distress/vulnerable/at risk are on the following pages.

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## Severe Weather Emergency Provision (SWEP)

SWEP opens when the weather is expected to drop below 1°C for more than 3 nights.

Contact **01484 221 350** to access SWEP or go to: [tiny.cc/KirkSWEP](https://tiny.cc/KirkSWEP)

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## Alcohol Withdrawal

Withdrawal from alcohol for heavy drinkers is very dangerous and must be carefully managed.

More information is available from Drinkaware at: [drinkaware.co.uk/alcohol-facts](https://drinkaware.co.uk/alcohol-facts)

# Response for Vulnerable Groups

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## Families and vulnerable Under-18s

For safeguarding concerns, contact Kirklees Children's Services Duty and Advice Team on [01484] 456 848 or 414 933 (if urgent and out of hours)

Specialist support for young people is available for accommodation needs (Housing Solutions Young Person's Team: 221 350), substance misuse (The Base: [tiny.cc/BaseCGL](https://tiny.cc/BaseCGL)) and mental health (CAMHS: [tiny.cc/KirkCAMHS](https://tiny.cc/KirkCAMHS))

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## Drug and Alcohol Support

CHART Kirklees provides free and confidential support to adults who may be using drugs or alcohol, as well as family members affected by substance misuse.

Contact us on **01484 353 333 (Huddersfield)** or **01924 438 383 (Dewsbury)** for more information or to refer for anyone in Kirklees for support.

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## People In Mental Distress

The Samaritans free helpline operates 24 hours a day: **116 123**. Huddersfield Samaritans at **14 New North Parade** are open to the public to visit every evening from 6.30pm-10 pm. **01484 533 388**

Kirklees Mental Health services are also available 24 hours a day for referrals and advice: **01924 316 830**

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## Vulnerable Adults

To report abuse or neglect of an adult at risk at any time call **01484 414 933**. Be aware that not everyone who is in a vulnerable situation will be deemed to be a "vulnerable adult". This concept is covered in safeguarding training. [tiny.cc/KirkCAMHS](https://tiny.cc/KirkCAMHS)

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## Pregnant Women

SWANS is a service for pregnant women over 20 who have complex social needs. Refer via [swans@kirklees.gcsx.gov.uk](mailto:swans@kirklees.gcsx.gov.uk) or **07968 745 869**

# Useful resources for Outreach Groups

## PARTNERSHIPS AND SUPPORT

Reporting rough sleepers to the outreach team: [streetlink.org.uk](http://streetlink.org.uk)

Council Voluntary sector hub:

[kirklees.gov.uk/beta/communities-and-volunteering.aspx](http://kirklees.gov.uk/beta/communities-and-volunteering.aspx)

Recruit Volunteers:

[volunteeringkirklees.org.uk/organisations/publicise-volunteering-opportunity-kirklees/](http://volunteeringkirklees.org.uk/organisations/publicise-volunteering-opportunity-kirklees/)

Good Practice in homelessness: [homeless.org.uk/our-work/resources](http://homeless.org.uk/our-work/resources)

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## TRAINING

Community Links offer a range of training courses in West Yorkshire, including on suicide prevention and managing risk.

Find out more at [commlinks.co.uk/training/courses/](http://commlinks.co.uk/training/courses/)

CHART Kirklees organise bespoke drug awareness training - call **01484 353 333**

First Aid & CPR: [kirkleesrecoverycollege.co.uk](http://kirkleesrecoverycollege.co.uk)

Mental Health First Aid: [mhfaengland.org/](http://mhfaengland.org/)

Safeguarding: [kirkleessafeguardingchildren.co.uk/course-brochure.html](http://kirkleessafeguardingchildren.co.uk/course-brochure.html)

More information on Training is available in the separate Homelessness Forum Training Details booklet.

## LEGAL/STATUTORY REQUIREMENTS

Charitable law:

[knowhownonprofit.org/organisation/operations/legal/charitylaw](http://knowhownonprofit.org/organisation/operations/legal/charitylaw)

Environmental Health Certification:

[kirklees.gov.uk/beta/health-safety-and-food-regulations/register-a-food-business.aspx](http://kirklees.gov.uk/beta/health-safety-and-food-regulations/register-a-food-business.aspx) [this is a legal requirement for all people providing food to the public]

To ensure you are meeting all legal requirements, groups may wish to participate in the Kirklees “Getting It Right First Time” course:

[kirklees.gov.uk/beta/business-and-economy.aspx#health-safety-and-food-regulations](http://kirklees.gov.uk/beta/business-and-economy.aspx#health-safety-and-food-regulations)

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## POLICIES

Safeguarding:

[kirkleessafeguardingchildren.co.uk/course-brochure.html](http://kirkleessafeguardingchildren.co.uk/course-brochure.html)

Confidentiality:

[vai.org.uk/services/policies-resources-and-toolkits/](http://vai.org.uk/services/policies-resources-and-toolkits/)

Risk Assessment:

[vai.org.uk/services/policies-resources-and-toolkits/](http://vai.org.uk/services/policies-resources-and-toolkits/)

Insurance:

[gov.uk/government/publications/charities-and-insurance-cc49](http://gov.uk/government/publications/charities-and-insurance-cc49)



## Homelessness support groups in Kirklees

Many groups and organisations operate in Kirklees supporting people experiencing homelessness with their many support needs.

Huddersfield Mission operate a community cafe and drop in advice service five days a week. It is well known for the support it offers people including those who are homeless. Huddersfield Mission is often the starting point for people experiencing homelessness and needing information and support. During the winter it runs an evening cafe providing a free hot meal five nights a week.

The Welcome Centre is the Huddersfield food bank. Its website has a comprehensive list of help available for people in need at [www.thewelcomecentre.org](http://www.thewelcomecentre.org), along with information sheets on a range of related topics.

You may also find it useful to check the information about homelessness support services more widely at [homeless.org.uk/search-homelessnessservices](http://homeless.org.uk/search-homelessnessservices) or [communitydirectory.kirklees.gov.uk](http://communitydirectory.kirklees.gov.uk)

## What we will do to ensure good practice in Street Outreach in Kirklees

- Work together with other voluntary groups to ensure that street outreach is provided where and when it is needed and without too much duplication.
- Work together with voluntary and statutory agencies in the Kirklees district that can provide specialist support and advice in order to prevent further rough sleeping.
- Attend the Kirklees Homelessness Forum Street Outreach Sub Group to discuss, plan and co-ordinate street outreach work across Kirklees, for example what the changing needs of rough sleepers are and where outreach work might be needed.





## We warmly encourage all who'd like to get involved in street outreach...

Before going any further though, we recommend the following steps:

1. Talk to the groups involved in this guide
2. Find out what exists already
3. Collaborate with an existing group where possible
4. Work out what needs aren't being met; which people aren't being supported, and which locations don't have provision
5. Tell us what you want to do so we can include you in this guide

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For more info and to get involve with this group, please contact:

Paul Bridges at Huddersfield Mission

Tel: 01484 421461

Email: [paul.bridges@huddersfieldmission.org.uk](mailto:paul.bridges@huddersfieldmission.org.uk)





The following organisations were involved in the development of the Good Practice in Street Outreach guide and are committed to the principles and practice of the guide.



This publication of this guide was resourced by



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## ECONOMY AND NEIGHBOURHOODS SCRUTINY PANEL – WORK PROGRAMME 2019/20

**MEMBERS:** Councillors Harpreet Uppal (Lead Member), Martyn Bolt, Richard Eastwood, Yusra Hussain, Richard Murgatroyd and John Taylor  
 Co-optees: Andrew Bird, Chris Friend, Eilidh Ogden

**SUPPORT:** Sheila Dykes, Principal Governance & Democratic Engagement Officer

FULL PANEL DISCUSSION		
ISSUE	APPROACH/AREAS OF FOCUS	NOTES
<b>Inward Investment Strategy</b>	<ul style="list-style-type: none"> <li>• Inward Investment Strategy                             <ul style="list-style-type: none"> <li>○ which businesses/sectors should be targeted and what do they need to be sustainable and grow.</li> <li>○ alternative sources of finance for environmental issues/ alternative energy use.</li> </ul> </li> </ul>	
<b>Skills Strategy</b>	<ul style="list-style-type: none"> <li>• What the Council is doing to develop skills Post 16 to ensure a local workforce that will have the right skills and qualifications to take advantage of planned investment across the district and neighbouring town and cities; including boosting skills to enable access to higher income and better quality jobs;</li> <li>• What are the gaps within the Kirklees district and the wider region?</li> <li>• What actions are being taken to address inequality?</li> <li>• Time series analysis and comparator data with the rest of the Leeds City Region and nationally.</li> <li>• Possible opportunities arising, from housing quality requirements, for development of the green economy in Kirklees by using the existing knowledge of relevant construction skills in the district; which also links into both the Housing Strategy and the Economic Strategy</li> </ul>	

<p><b>Towns and Communities in Kirklees</b></p>	<ul style="list-style-type: none"> <li>• Consider and assess the plans being developed for town centres.</li> <li>• Huddersfield Town Centre Masterplan – to look at the engagement and consultation process particularly in relation to local stakeholders and small businesses.</li> <li>• Assess the objectives of plans to include the aspirations/vision for the towns, public realm and infrastructure.</li> <li>• Consideration of the wider context of other town centres/villages across Kirklees to include looking at the key challenges and opportunities that could influence this agenda.</li> </ul>	<p><u>17 July 2019</u>  Report on the Huddersfield Blueprint – with a focus on engagement and consultation.  Head of Development and Master Planning requested to provide additional information in respect of a number of related issues and to include information in future reports in relation to measures to make public transport an attractive option/potential impact on other town centres/environmental impact.</p> <p>Informal meeting planned in relation to the engagement and consultation process on the Blueprint, October 19.</p>
<p><b>Green Space Strategy</b></p>	<p>To consider the proposed approach to the draft Greenspace Strategy; focus on engagement and consultation.</p>	
<p><b>Playable Spaces Strategy</b></p>	<p>To consider the proposed approach to the draft Playable Spaces Strategy; focus on engagement and consultation.</p>	
<p><b>Digital Strategy</b></p>	<p>Update report 12 months after implementation to include:</p> <ul style="list-style-type: none"> <li>• Progress with physical infrastructure but also in respect of the wider promotion of the advantages of the Kirklees district.</li> <li>• The work being undertaken relating to the development of appropriate skills (links in with Skills Strategy)</li> <li>• The work being done to ensure that residents within more rural areas are supported to be able to access a digital network that is fit for purpose and future proofed.</li> </ul>	



<b>Planning and Related Issues</b>	<ul style="list-style-type: none"> <li>• Community Infrastructure Levy/Section 106 Agreements; to include the associated administrative process and effectiveness of the provision of ‘Metrocards’</li> <li>• Progress in relation to the development of the supporting policies for the Local Plan</li> <li>• Bus service provision relative to: the Local Plan and the planning system/ new development (links in with air quality).</li> </ul>	
<b>Active Travel</b>	<ul style="list-style-type: none"> <li>• Cycling and Walking Framework</li> </ul>	Study Visit planned.
<b>Waste Strategy</b>	<p>New National Resources and Waste Strategy is being developed. Areas could include:</p> <ul style="list-style-type: none"> <li>• Implications for Kirklees Waste Strategy; Scrutiny to feed into proposals/engagement in relation to changes to collection regime.</li> <li>• Litter and Environmental Crime – approach; to include statistics and analysis/ how ‘hotspots’ are targeted/ trends/how the work of the Street Cleansing Teams is focused/ feedback on the Ward Based Action Squads.</li> <li>• Considering what work is being done with the local population and local business in respect of avoiding and reducing waste/single use plastic.</li> <li>• Household Waste Recycling Centres; accessibility/permit process/layout/potential barriers to use.</li> </ul>	<p><u>19 September 2019</u>  Recommendations:</p> <ul style="list-style-type: none"> <li>• Ward Councillors should be provided with an overview of the issues reported to the Council by residents (including on ROSS) to assist them in determining the priorities for action within their ward.</li> <li>• Consideration be given to how best the Service might be able to support ward members in promoting and publicising this work to their residents.</li> <li>• The Service should consider raising awareness within schools and colleges of the potential for volunteering opportunities and work experience.</li> <li>• A strategic environmental assessment should be undertaken as part of the development of the Kirklees Waste Strategy.</li> <li>• Disposal of trade waste, including the potential impact on the levels of fly tipping, should be considered as part of the development of the new waste strategy.</li> <li>• Fly tipping be retained on the Panel’s Work Programme with a particular focus on the use of an intelligence led approach.</li> <li>• It would be beneficial to increase awareness of the concessions available for the bulky waste collection</li> </ul>

		<p>service for those residents in receipt of an assisted bin service, and the permit process for the Household Waste Recycling Centres.</p> <ul style="list-style-type: none"> <li>• That Members of the Panel be provided with: <ul style="list-style-type: none"> <li>○ data in relation to the number of fines collected for littering and fly tipping compared with the number issued.</li> <li>○ the enforcement flow chart.</li> <li>○ the gross tonnage figures for the Household Waste Recycling Centres broken down into general waste/recyclable waste for 2015/16 onwards.</li> </ul> </li> </ul>
<b>Housing</b>	<ul style="list-style-type: none"> <li>• Relationship with KNH</li> <li>• Preventing Homelessness and Rough Sleeping Strategy; update post implementation including statistics on housing need/waiting lists/rough sleepers.</li> <li>• Tenant Involvement and Engagement</li> </ul>	<u>10 October 2019</u>
<b>LEAD MEMBER BRIEFING/MONITORING</b>		
<b>ISSUE</b>	<b>APPROACH/AREAS OF FOCUS</b>	<b>NOTES</b>
<b>Economic Strategy</b>	Update following implementation (9-12 months). to include: Progress in respect of the priorities and actions set out in the Kirklees Economic Strategy (KES); what has been done and economic position statement including outcomes.	KES 2019-25 approved March 2019
<b>Air Quality</b>	Update after completion of consultation	<u>10 October 2019</u>
<b>Housing</b>	<ul style="list-style-type: none"> <li>• Kirklees Housing Strategy; progress report 12 months after implementation</li> <li>• Selective Licensing Schemes</li> <li>• Hackitt Report: update on the progress of the Working</li> </ul>	

	<p>Group established to work through the Hackitt Report's detailed implications. Other potential areas for future consideration included:-</p> <ul style="list-style-type: none"> <li>○ the success of the Council in involving residents in the management and monitoring of social housing stock;</li> <li>○ the ability to provide more social housing and manage effectively;</li> <li>○ an examination of neighbourhood working and how the Council could manage and improve neighbourhoods and work with residents to tackle their concerns.</li> </ul>	
<p><b>Tackling Poverty</b></p>	<p>To consider the approach to tackling poverty</p>	

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