



THE LONDON BOROUGH
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DATE: 23 March 2020

To: Members of the

**ENVIRONMENT AND COMMUNITY SERVICES
POLICY DEVELOPMENT AND SCRUTINY COMMITTEE**

Councillor Will Harmer (Chairman)

Councillor Kieran Terry (Vice-Chairman)

Councillors Mark Brock, Ian Dunn, Colin Hitchins, Samaris Huntington-Thresher ,
Melanie Stevens, Harry Stranger and Michael Tickner

MARK BOWEN

Director of Corporate Services

**Decisions on the following reports are due to be taken by the Portfolio Holder for
Environment and Community Services on or after 30th March 2020.**

*Copies of the documents referred to below can be obtained from
<http://cds.bromley.gov.uk/>*

- a **STREET LIGHTING - CAPITAL SPEND REPORT AND REVISED
DIMMING POLICY**
(Pages 3 - 8)
- b **BUDGET MONITORING 2019/20**
(Pages 9 - 20)
- c **HOMESDALE ROAD - PROPOSED ZEBRA CROSSING AND MINI
ROUNDAABOUT**
(Pages 21 - 28)
- d **COURT ROAD - PEDESTRIAN AND CYCLE IMPROVEMENTS**
(Pages 29 - 34)
- e **CCTV TRAFFIC ENFORCEMENT SYSTEM & ADDITIONAL SCHOOL
CCTV ENFORCEMENT CAMERAS.**
(Pages 35 - 42)

- f AMENDMENT TO THE PUBLIC SPACES PROTECTION ORDER (PSPO),
DOG CONTROL & FOULING ENFORCEMENT POWERS**
(Pages 43 - 108)

- g DRAFT AIR QUALITY ACTION PLAN CONSULTATION**
(Pages 109 - 154)

- h CAPITAL PROGRAMME MONITORING - 3RD QUARTER 2019/20**
(Pages 155 - 162)

- i REDUCTION AND RECYCLING PLAN**
(Pages 163 - 180)

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Report No.
Please obtain
a report
number

London Borough of Bromley

PART ONE - PUBLIC

Decision Maker: Environment Portfolio Holder

Date: 17th March 2020

Decision Type: Non-Urgent Non-Executive Non-Key

Title: **STREET LIGHTING - CAPITAL SPEND REPORT AND REVISED DIMMING POLICY**

Contact Officer: Garry Warner, Assistant Director (Highways)
Tel: 020 8313 4929 E-mail: garry.warner@bromley.gov.uk

Chief Officer: Colin Brand , Director of Environment and Public Protection

Ward: Borough Wide

1. Reason for report

Following completion of the street lighting invest to save project this report considers the outcome of the project and a revised dimming policy for for future installations.

2. **RECOMMENDATION(S)**

The Environment Portfolio Holder approves:-

- 2.1 That the 2020/21 revenue budget for street lighting improvements is utilised to replace those corroded steel lamp columns identified to be of the highest priority;
- 2.2 That the revised dimming strategy be adopted for future street lighting installations on traffic routes and residential roads.

Impact on Vulnerable Adults and Children

1. Summary of Impact: None
-

Corporate Policy

1. Policy Status: Existing Policy:
 2. BBB Priority: Excellent Council Quality Environment Safe Bromley:
-

Financial

1. Cost of proposal: £388k to replace lamp columns
 2. Ongoing costs: Recurring Cost:
Savings from the Street Lighting Invest to Save Initiative £175k p.a. (i.e. reduced costs)
Future savings from the revised dimming strategy TBD
 3. Budget head/performance centre: Street Lighting Invest to Save Initiative capital programme and Highways Street Lighting revenue budget
 4. Total current budget for this head: Capital Programme £8.5m; Revenue Budget 2020/21 £3.7m
 5. Source of funding: LBB capital budget for the invest to save project and existing revenue budgets for improvement and maintenance tasks
-

Personnel

1. Number of staff (current and additional): 3 fte
 2. If from existing staff resources, number of staff hours: 3 fte
-

Legal

1. Legal Requirement: Statutory Requirement:
 2. Call-in: Applicable:
-

Procurement

1. Summary of Procurement Implications: None – existing contract
-

Customer Impact

1. Estimated number of users/beneficiaries (current and projected): Boroughwide
-

Ward Councillor Views

1. Have Ward Councillors been asked for comments? No
2. Summary of Ward Councillors comments: n/a

3. COMMENTARY

Background

- 3.1 The Council is responsible for maintaining 27,784 street lights across the borough. In March 2012 (report no ES12020) the Executive approved a business case for the street lighting invest to save programme, to replace of the Council's oldest concrete and steel lamp columns. Following the award of a new contract in 2013 the Executive approved an extension to the capital project to allow a total of 14,000 low energy LED lanterns to be installed.
- 3.2 The business case for the project predicted a repayment period of ten years, based on savings from existing revenue budgets. As the capital investment is due to be fully repaid during 2020/21, elements of the revenue budgets will be available for further street lighting works.
- 3.3 In 2008 the Environment Portfolio Holder approved a street lighting dimming strategy for residential roads. As this has been successful in reducing electricity consumption it is proposed that the strategy is extended to traffic routes.

Future Street Lighting Projects

- 3.3 The street lighting invest to save budget of £8.5m has allowed 7,902 concrete and older steel lamp columns to be replaced with new galvanised steel columns and energy efficient LED lanterns, and a further 6,000 sodium lanterns to be replaced with LED units on the existing lamp columns.
- 3.4 Repayments to the capital fund have been financed during the last nine years from existing revenue budgets for street lighting improvements, reduced maintenance tasks, electricity and staff costs.
- 3.5 A final payment of £532k is due to be funded from existing 2020/21 revenue budgets. This will leave a remaining amount of £388k from the annual budget budget allowance for repayments to be utilised for further street lighting tasks in 2020/21.
- 3.6 As part of the Council's asset management plans, all steel lamp columns are tested for structural integrity every six years. Those columns identified in 2013 as requiring replacement were included in the capital project. A contingency sum was retained within the capital budget, and used to fund defective units identified as dangerous in subsequent surveys.
- 3.7 While the Council has ambitions to convert the remaining street lights to LED's, recent structural tests have identified a further 649 lamp columns with a service life of less than five years. It is therefore proposed that the residual 2020/21 street lighting improvement budget of £388k is used to replace those columns with the highest priority; the lanterns would also be converted to LED units as current practice.

Dimming of Street Lighting

- 3.8 When developing lighting schemes local authorities can draw on guidance provided in the British Standard Codes of Practice and equivalent European Standards. While these provide advice on good lighting practice they are not mandatory, although as local authorities do have a duty of care it is advisable to have a lighting policy based on the standards.
- 3.9 The standards recognise the need for lighting authorities to develop schemes with designs that are appropriate for the application, and should assist in the avoidance of over-lighting and excessive energy consumption; providing "right light in the right place at the right time". Street lighting in Bromley should therefore match the varying needs of traffic and pedestrian flows, on

different road types, while minimising the use of energy and maintaining road safety and security.

- 3.10 Street lighting designs are based on the peak hourly traffic flow during the hours of darkness, which are usually the early morning and evening peaks during the winter months. The current standards include the provision of variable lighting based on road category, traffic type and traffic flows, with a suggestion that lighting levels could be reduced when traffic flows reduce.
- 3.11 In 2008 the Environment Portfolio Holder approved a street lighting dimming strategy for residential roads, where all lamp columns would be dimmed by 30% between mid-night and 6am when roads are footways are used less. This profile was originally integrated into the new lanterns, but subsequently managed by the Central Management System (CMS) for all new lanterns installed as part of the invest to save project.
- 3.12 On 18th September 2019 (report ES19056) the Executive approved a programme to replace 3,870 street light lanterns on the borough's traffic routes with more efficient LED units at a cost of £1.124m, funded from the Carbon Management Fund of £500k and an additional interest-free SEELS loan of £624k.
- 3.13 Traffic data has been used to allow suitable lighting levels to be designed for the varying traffic flows on Bromley's traffic routes while meeting the requirement of the current standards. It is therefore proposed that street lighting designs on traffic routes are based on a suitable lighting class, with lighting levels being reduced by one lighting class between 10pm and 6am, and a further lighting class between 1am and 5am.
- 3.14 Street lighting on traffic routes consumes more electricity than residential roads due to the increased lighting levels. A comparison of annual electricity costs for the existing SON lantern and proposed LED lanterns for each option are shown below;

Lamp Type	Burning hours	Annual Energy Cost
250w son	Normal hours	£185.39
AXIA 3.2 32 LED	Normal hours - dusk till dawn	£42.50
	Dimmed 25% from 12pm - 6am	£36.83
	Dimmed 25% from 10pm - 6am	£34.94
	Dimmed 25% from 10pm - 6am, and 50% from 1am - 5am	£31.16

- 3.15 Following consultation with the Environment Portfolio Holder a trial commenced in January 2020 to extend the periods of dimming of 353 lamp columns in residential roads using the CMS. Where street lighting is currently dimmed by 30% between mid-night and 6am, this has been bought forward to 10pm, with lighting levels being further reduced to 50% between 1am – 5am.
- 3.16 No feedback has been received to date from residents or visitors to these areas, and it is proposed that this revised dimming strategy is used for all residential roads controlled by the CMS and for future projects in residential roads.

4. POLICY IMPLICATIONS

- 4.1 The Council's vision for Bromley is that it remains a place where people choose to live and do business. Modern, safe, reliable and efficient street lighting has an important part to play in realising this vision particularly in terms of improving public perception of the street scene, enhancing community safety and security and promoting the accessibility of public transport and other local services during the hours of darkness. These align well with the policy priorities in Building a Better a Bromley.

5. FINANCIAL IMPLICATIONS

- 5.1 Final capital expenditure on the invest to save project is estimated at £8.5m. This investment will have been fully repaid during 2020/21. A recurring annual revenue saving of £175k in energy costs has been achieved.
- 5.2 The 2020/21 revenue budget for Street Lighting is £3.7m. This takes account of the £175k savings in energy costs and includes provision for street lighting maintenance and improvements as shown in the table below: -

	£'000
Energy	1,416
Maintenance	781
Minor Improvements	126
Replacements	588
LTCS	480
Staffing	173
Other Budgets	107
Total	3,671

- 5.2 It had been assumed that a total of £920k would be required in 2020/21 from within these budgets to repay the capital investment. However, the final payment now due is £532k and leaves a balance of £388k available for lamp column replacements.
- 5.2 The use of street lighting revenue budgets in later years will be subject to a future report.

6. LEGAL IMPLICATIONS

- 6.1 The Highways Act 1980 empowers the Council as Highway Authority to provide lighting. The Council has a duty of care to the highway user and must ensure it can demonstrate it has systems and programmes in place to ensure the safety of all highway lighting equipment.

Non-Applicable Sections:	IMPACT ON VULNERABLE ADULTS AND CHILDREN PERSONNEL IMPLICATIONS PROCUREMENT IMPLICATIONS
Background Documents: (Access via Contact Officer)	[Title of document and date]

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Report No.

London Borough of Bromley

PART ONE - PUBLIC

Decision Maker: ENVIRONMENT & COMMUNITY SERVICES PORTFOLIO HOLDER

For Pre-Decision Scrutiny by the Environment & Community Services PDS Committee on:

Date: 17th March 2020

Decision Type: Non-Urgent Executive Non-Key

Title: BUDGET MONITORING 2019/20

Contact Officer: Keith Lazarus, Head of Finance ECS & Corporate
Tel: 020 8313 4312 E-mail: Keith.Lazarus@bromley.gov.uk

Chief Officer: Colin Brand, Director of Environment & Public Protection

Ward: (All Wards);

1. Reason for report

This report provides an update of the latest revenue budget monitoring position for 2019/20 for the Environment & Community Services Portfolio, based on expenditure and activity levels up to 31 December 2019.

2. **RECOMMENDATION(S)**

The Environment & Community Services Portfolio Holder is requested to:

- 2.1 Consider the latest 2019/20 revenue budget monitoring for the Environment & Community Services Portfolio.

Impact on Vulnerable Adults and Children

1. Summary of Impact: None directly from this report.
-

Corporate Policy

1. Policy Status: Sound financial management
 2. BBB Priority: Excellent Council Quality Environment
-

Financial

1. Cost of proposal: Not Applicable
 2. Ongoing costs: Recurring Cost
 3. Budget head/performance centre: All Environment & Community Services Portfolio Budgets
 4. Total current budget for this head: £39.7m
 5. Source of funding: Revenue budgets 2019/20
-

Personnel

1. Number of staff (current and additional): 154.5fte
 2. If from existing staff resources, number of staff hours: N/A
-

Legal

1. Legal Requirement: Statutory Requirement: The statutory duties relating to financial reporting are covered within the Local Government Act 1972; the Local Government Finance Act 1998; the Accounts and Audit Regulations 1996; the Local Government Act 2000 and the Local Government Act 2002
 2. Call-in: Applicable
-

Procurement

1. Summary of Procurement Implications: N/A
-

Customer Impact

1. Estimated number of users/beneficiaries (current and projected): The services covered in this report affect all Council Taxpayers, Business Ratepayers, those who owe general income to the Council, all staff, Members and Pensioners.
-

Ward Councillor Views

1. Have Ward Councillors been asked for comments? Not Applicable
2. Summary of Ward Councillors comments:

3. COMMENTARY

- 3.1 This report sets out the results of the latest quarterly revenue budget monitoring exercise for the 2019/20 financial year for the Environment and Community Services Portfolio.
- 3.2 The projected outturn is detailed in Appendix 1a. This forecasts the projected spend for each division within the Portfolio compared to the latest approved budget. Appendix 1b provides commentary on the projected variations in each service.
- 3.3 The current position is a projected overall underspending of £0.307m based on financial information available as at 31 December 2019. Of this, the projected variation against budgets controlled by managers within Environmental and Community Services Portfolio is £0.276m.
- 3.4 Some of the main variations are highlighted below.

Street Scene & Green Space (Cr £6k)

- 3.5 On Parks and Green Spaces, there is a projected underspend against grounds maintenance contract costs of £75k together with forecast additional income. These are largely offset by expenditure on a number of one-off essential works, resulting in a net underspending of £7k.
- 3.6 There are a number of small variations on Business Support and Markets resulting in forecast underspending of £51k
- 3.7 Waste Services budgets overall are forecast to be on target, although there are a number of offsetting projected variations as follows.
- waste disposal costs are expected to be £386k below budget mainly due to a reduction in waste taken to landfill and incurring landfill tax as the contractor is meeting future year targets early;
 - waste collection contract costs are projected to be £167k higher than budgeted due to a number of factors including an increase in the number of properties resulting from a review under the new contract;
 - income from recyclates is anticipated to underachieve by £224k as a result of a reduction in paper tonnage that can be recycled and a decrease in price indices in the later part of the year.

- 3.8 Street Environment, Street Regulation and Management Contract & Support budgets are projected to underspend by £28k mainly as a result of a number of staff related variations.
- 3.9 Additional one-off costs of £80k are being incurred within Arboriculture Management, funded from underspends elsewhere within the service, to undertake additional tree planting and to purchase equipment that will reduce future reliance on external contractors.

Traffic, Parking and Highways (Cr £265k)

- 3.10 Within Traffic and Road Safety £131k of additional income is forecast relating to road closure charges due to an increase in applications from utility companies undertaking works. As a result, a number of road safety and minor repair projects are being undertaken to utilise this additional income.
- 3.11 There is a projected shortfall of £53k for income from bus lane contraventions due to road closures and diversions for street works

- 3.12 The reduction in parking usage continues and a net deficit of £274k is now projected. This is partly offset by a reduction in credit card commission costs and additional income resulting from the increasing use of the Ringo cashless parking service.
- 3.13 Income from parking permits is projected to overachieve by £64k mainly due to increased levels of activity.
- 3.14 As a result of the deployment of additional enforcement officers by the contractor, the increase in the number of penalty charge notices issued is projected to generate additional income above target of £144k. A forecast reduction in contract and credit card commission costs will increase the overall variation on this service to cr£236k.
- 3.15 There is a net underspend of £123k on the Parking Shared Service budget mainly due to vacancies across both boroughs.
- 3.16 There is a projected £32k underspend relating to staffing within Highways, mainly due to reduced hours and part year vacancies.
- 3.17 The major variations are summarised in the following table:

	£'000
Reduction in waste disposal costs	Cr 386
Increase in waste collection contract costs	167
Reduction in recyclates income	224
Net reduction in income from car parking	145
Net increase in car parking enforcement income	Cr 236
Reduced parking shared service costs	Cr 123
Other net variations	Cr 67
Total Variation (controllable budgets)	Cr 276
Non-controllable budgets	Cr 31
Portfolio Total	Cr 307

4. IMPACT ON VULNERABLE ADULTS AND CHILDREN

- 4.1 The 2019/20 budget reflects the financial impact of the Council's strategies and service plans which impact on all of the Council's customers and users of our services.

5. POLICY IMPLICATIONS

- 5.1 The "Building a Better Bromley" objective of being an Excellent Council refers to the Council's intention to provide efficient services and to have a financial strategy that focuses on stewardship and sustainability. Delivering Value for Money is one of the Corporate Operating Principles supporting Building a Better Bromley.
- 5.2 The "2019/20 Council Tax" report highlighted the financial pressures facing the Council. It remains imperative that strict budgetary control continues to be exercised in 2019/20 to minimise the risk of compounding financial pressures in future years.

5.3 Chief Officers and Departmental Heads of Finance are continuing to place emphasis on the need for strict compliance with the Council's budgetary control and monitoring arrangements.

6. FINANCIAL IMPLICATIONS

6.1 A detailed breakdown of the projected outturn by service area is shown in Appendix 1a with explanatory notes in Appendix 1b.

6.2 Overall, an underspending of £0.307m is projected to the year-end based on the information available as at 31 December 2019.

7 COMMENTS FROM THE DIRECTOR OF ENVIRONMENT & PUBLIC PROTECTION

7.1 The Environment and Community Services Portfolio controllable budget has a projected net underspend of £276k for 2019/20. This is made up of a number of projected variations.

7.2 Within waste, there continues to be projected variations across these volatile service budgets although the overall budget is projected to be on target. Collection costs are higher than anticipated for a range of reasons, whilst income from recyclates and trade waste is under achieving against the budget. However, this is largely offset by a reduction in disposal costs including a significant fall in the cost of landfill.

7.3 Whilst projected income from parking charges continues to be lower than budgeted, primarily as a result of the continuing downward trend in parking usage, there has been a significant increase in income from Penalty Charge Notices (PCNs) issued against previous periods, partly because the parking contractor, at their expense, has deployed a greater number of Civil Enforcement Officers (CEOs). Together with the position on the parking shared service, this results in parking overall currently projecting a £221k net underspend.

7.4 The waste contracts have been in place since April 2019. Contract costs are subject to volatility as any growth in the number of properties and tonnages collected will incur additional expenditure, due to the extra collections that would be required and the additional waste that is generated. Any fluctuations on the market prices will affect the income from sales of recyclates income. Another potential risk area is recycling paper income. Wet weather affects the quality of the paper collected and therefore may lead to issues arising with the processing of it as 'paper' and a loss of income.

7.5 There continues to be the risk in Parking from fluctuations in both income from On and Off Street Parking as usage varies, as well as changes in enforcement income. Although the latter is currently projected to overachieve, income levels are difficult to predict as accurately as levels of parking are dependent on a wide variety of factors of which some are beyond the Council's control.

7.6 Many of the Portfolio's services can be affected by severe weather events which cannot be predicted. In particular, the highways winter service, grounds maintenance and trees.

Non-Applicable Sections:	Legal, Personnel & Procurement Implications
Background Documents: (Access via Contact Officer)	2019/20 budget monitoring files within E&CS Finance section

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Environment & Community Services Portfolio Budget Monitoring Summary

2018/19 Actuals £'000	Service Areas	2019/20 Original Budget £'000	2019/20 Latest Approved £'000	2019/20 Projected Outturn £'000	Variation £'000	Notes	Variation Last Reported £'000	Full Year Effect £'000
	PLACE DEPARTMENT							
	Street Scene & Green Spaces							
5,328	Parks and Green Spaces	5,441	5,544	5,537	Cr 7	1	12	0
6	Business Support and Markets	26	Cr 77	Cr 128	Cr 51	2	Cr 20	0
17,096	Waste Services	17,833	17,853	17,853	0	3	Cr 100	0
4,289	Street Environment	5,288	5,563	5,536	Cr 27	4	Cr 20	0
362	Street Regulation	375	249	194	Cr 55	5	Cr 8	0
1,172	Management and Contract Support	1,255	1,266	1,320	54	6	41	0
802	Trees	769	717	797	80	7	10	0
29,055		30,935	31,115	31,109	Cr 6		Cr 85	0
	Transport Operations and Depot							
527	Transport Operations and Depot Management	746	726	721	Cr 5	8	0	0
527		746	726	721	Cr 5		0	0
	Traffic, Parking & Highways							
234	Traffic & Road Safety	334	334	322	Cr 12	9	Cr 109	0
Cr 7,499	Parking	Cr 7,539	Cr 7,538	Cr 7,759	Cr 221	10 - 14	Cr 184	0
6,175	Highways (including London Permit Scheme)	6,818	6,678	6,646	Cr 32	15	Cr 61	0
Cr 1,090		Cr 387	Cr 526	Cr 791	Cr 265		14	0
28,492	TOTAL CONTROLLABLE	31,294	31,315	31,039	Cr 276		Cr 71	0
4,378	TOTAL NON-CONTROLLABLE	6,051	6,051	6,020	Cr 31	16	15	0
2,618	TOTAL EXCLUDED RECHARGES	2,357	2,357	2,357	0		0	0
35,488	PORTFOLIO TOTAL	39,702	39,723	39,416	Cr 307		Cr 56	0

Reconciliation of Latest Approved Budget £'000

Original Budget 2019/20 39,702

Carry Forward Requests approved from 2019/20

Green Garden Waste Direct Debits 120

Central Contingency Adjustments

Inflation adjustment 70

Savings - review of staffing Cr 207

B/R Parks Contract related storage and Premises 25

Savings to be allocated – review of staffing Cr 54

Cross Portfolio movement relating to Review of Staffing 80

Post moved from Street Regulation to PPE (Nuisance and Environmental Protection) Cr 13

Latest Approved Budget for 2019/20

39,723

REASONS FOR VARIATIONS**1. Parks and Green Spaces Cr £7k**

The grounds maintenance budget is forecasting a £75k underspend based on the current level of spend under the new contract. However, there is a requirement to dredge a number of lakes and ponds within parks as these necessary works have not been undertaken for a few years. This will cost £75k this financial year.

Water bills are forecast to overspend by £30k due to leaks at Croydon Rec and Stanhope.

Grants of £32k have been received through the Rural Payments Agency relating to 2 parcels of land that LBB manage according to designations prescribed by Natural England.

There is a requirement to install a water supply at Mill Road allotments and this will cost £25k.

Staffing is forecast to underspend by £15k relating to part year vacancies.

A VAT discrepancy relating to floral bed sponsorship, backdated to 2016, was corrected this financial year resulting in a current year deficit of £24k.

Additional income of £23k from the High Elms café and from allotment rental is forecast.

Income achieved from the disposal of machinery and through Cator Park rental is £16k.

Summary of variations within Parks:

	£'000
Grounds maintenance contract	Cr 75
Lake dredging and additional works	75
Water bills relating to leaks	30
Rural Payment Agency grants	Cr 32
Water supply at Mill Road allotments	25
Underspend on staffing	Cr 15
Adjustment of VAT for floral bedding sponsorship income	24
Additional licence income from café at High Elms and allotment rental	Cr 23
Disposal of machinery and Cator Park rental income	Cr 16
Total variation for Parks	Cr 7

2. Business Support and Markets Cr £51k

Technical Support staffing is forecast to underspend by £16k due to a vacant post.

Income from markets pitch fees is forecast to underachieve by approximately £30k. This is partially due to adverse weather conditions forcing cancellations during the months leading up to Christmas.

Street Traders licence income is projected to exceed budget by £25k based activity levels to date.

Income generated through advertising and cost recoveries will overachieve by a projected £21k in line with previous years.

Skip licence income is forecast to result in a £7k shortfall which is linked to activity in the construction industry and home improvements.

There are a number of other small variations within markets and technical support which total result in a £26k underspend.

Summary of variations within Business Support and Markets:

	£'000
Underspend on staffing	Cr 16
Underachievement of market pitch fees	30
Overachievement of Street Traders' licence income	Cr 25
Overachievement of income from advertising and recoveries	Cr 21
Underachievement of Skip Licence Income	7
Other variations	Cr 26
Total variations for Business Support and Markets	Cr 51

3. Waste Services

Waste Services budgets overall are projected to be on target, although there are a number of significant offsetting variations as follows:

Landfill Tax is forecast to result in a £382k underspend. The amount of waste taken to landfill has dropped significantly in the later part of 2019 and is forecast to be minimal for the remainder of the financial year as the contractor is meeting future year targets early.

The refuse collection contract is forecast to be £167k overspent this financial year as a result of the following:

- a higher number of containers delivered to households than anticipated;
- the emptying of recycling banks has resulted in a cost pressure due to the number of banks exceeding the total expected at the time of the tender exercise.
- the processing of mattresses and asbestos has also exceeded the levels anticipated, although mattress disposal fees have recently been increased to reduce the volume received from businesses in particular;
- a full review of property numbers has been undertaken as part of the new contract arrangements which has resulted in an increase in collection costs this financial year.

Green Garden Waste income will overachieve by £66k based on the number of customers purchasing this service. However, the associated collection costs are forecast to underspend by £122k as tonnages are lower than expected, although this is offset by the cost of multiple attempts to deliver and collect green garden waste containers to customers which has resulted in a £122k cost pressure. Discussions have taken place to ensure this is minimised going forward.

Based on latest tonnages, the contract disposal cost is expected to be only £4k below budget. Whilst there has been a reduction in the number of trade waste customers and a drop in the volume of waste to be disposed of, this has been largely offset by an additional cost relating to wet paper and card being rejected and returned to Bromley for disposal during the latter part of 2019. This trend is expected to continue to some extent throughout the remainder of the financial year, however officers are exploring options to reduce this.

There is an anticipated reduction in recyclate income of £224k. This is a result of a reduction in paper tonnage being recycled as reflected above in additional disposal costs. In addition, there is a projected loss of income due to a decrease in price indices, again particularly effecting paper and card, during the latter part of the financial year.

Within Trade Waste there is a net projected shortfall of income of £63k mainly due to a higher customer dropout compared to the level expected when the budget was set.

Summary of overall variations within Waste Services

	£'000
Reduction in landfill tax	Cr 382
Increase in refuse collection contract costs	167
Green Garden Waste	Cr 66
Reduction in disposals cost	Cr 4
Reduction in recyclate income	224
Shortfall in trade waste income	63
Other minor variations	Cr 2
Total variation for Waste Services	0

These projected variations can be summarised by service area as follows:

	Exp	Inc	Total
	£'000	£'000	£'000
Household Collection & Recyclates	167	224	391
Trade Waste		63	63
Waste Disposal	Cr 386		Cr 386
Green Garden Waste	0 Cr	66 Cr	66
Waste Management	Cr 2		Cr 2
	Cr 221	221	0

4. Street Environment Cr £27k

There is a projected underspend of £18k on staffing relating to part year vacancies. Other small underspends total £9k.

5. Street Regulation Cr £55k

There is a projected underspend of £55k on staffing relating to part year vacancies within this team.

6. Management and Contract Support Dr £54k

Staffing is projected to overspend due to agency staff employed above establishment to provide contract monitoring support. This arrangement ended in December 2019. This is partly offset by other staff vacancies and small underspends on supplies and services.

7. Arboriculture Management Dr £80k

A £60k underspend on staffing is forecast in respect of two vacant arboricultural officer posts, which have now been appointed to. These vacancies has resulted in additional annual tree surveys procured through outside contractors at a cost of £60k which offsets the staffing underspend.

A sonic tomograph for advanced condition detection within trees will be purchased for £30k, allowing LBB staff to undertake this work rather than having to utilise external companies. There may also be scope in the future to sell some services to external agencies such as academies. Phase two of tree planting will be implemented during February and March and will cost £50k.

These additional one-off costs can be managed within the overall Street Services and Green Spaces budget.

8. Transport Operations & Depot Management Cr £5k

A number of small staffing underspends relating to in year vacancies are forecast totalling £15k. This is partly offset by tenant maintenance costs at the central depot forecast to exceed budget by £10k.

9. Traffic & Road Safety Cr £12k

There is a projected underspend of £12k across Traffic & Road Safety, mainly due to additional income of £131k received from road closure charges following a spike in the number of applications from utility companies for undertaking infrastructure works. It is expected this volume of activity will continue into 2020/21. A number of road safety projects and schemes, including some minor road repairs, will be undertaken during February and March 2020 in order to use the surplus income effectively. Project expenditure will be £130k. There are other minor credit variations totalling £15k mainly due to staffing and income generated from the Streetwise Project.

Parking Cr £221k**10. Income from Bus Lane Contraventions Dr £53k**

There is a net projected deficit of £53k on the deployable automated cameras in bus lanes for 2019/20 based on the number of contraventions to November 2019. A reduction in the number of contraventions issued continues through Quarter 3, mainly due to issues at Crystal Palace Parade which is still undergoing works on a new traffic layout. LBB officers have been advised the bus lane isn't likely to be reinstated until mid-February.

11. Off/On Street Car Parking Dr £145k

A shortfall of £274k is forecast for Off and On Street parking income. This is mainly due to the general continued downward trend in parking usage, in particular at The Hill MSCP. However some improvement in usage can be seen compared to Quarter 2, but not at the levels anticipated when income targets were agreed. This also includes £8k from off-street rental income for Supreme Clean at Chislehurst and Amazon Lockers.

Following analysis of credit card commission costs, there is a potential underspend of £59k which is largely a result of the changes in parking usage.

Additional income of £58k is expected to be received from cashless parking fees, as use of the Ringo service continues to grow.

Income generated through bay suspensions is expected to be just above budget by £1k however this is offset by a potential deficit in dispensations income of £7k.

There are contract defaults of £18k against Off and On Street parking to November 2019.

This overall projected variation for Off and On Street parking is detailed below:

	Off St.	On St.	Total
	£'000	£'000	£'000
Summary of variations within Off/On Street Car Parking			
Car parking income	138	136	274
Credit card commission	Cr 59		Cr 59
RingGo SMS & convenience fees	Cr 19	Cr 38	Cr 58
Bay suspensions		Cr 1	Cr 1
Dispensations		7	7
APCOA contract defaults	Cr 6	Cr 12	Cr 18
Total variations within Off/On Street Parking	54	92	145

12. Permit Parking Cr £64k

Activity levels to November 2019 indicate a potential overachievement of £59k relating to permit parking income, following the implementation of price increases from 1 April 2019, along with a small underspend against credit card commission costs of Cr £5k.

13. Car Parking Enforcement Cr £236k

There is a £144k overachievement of income relating to PCNs issued by wardens, due to more PCNs being issued than originally forecast in Quarters 1 and 2 following APCOA deploying additional CEOs at their own cost.

There is a £8k deficit on PCNs issued from CCTV enforcement cameras. Despite the deployment of new cameras around schools in September which have produced an increase in contraventions, there are cameras at other schools that have resulted in higher compliance but have not been relocated resulting in reduced income.

Following analysis of credit card commission costs, there is a potential underspend of £38k.

There are defaults on the Enforcement contract of around £61k for the period to November 2019.

	£'000
Summary of variations within Car Parking Enforcement	
PCNs issued by wardens	Cr 144
PCNs issued from CCTV enforcement camera	8
Credit card commission	Cr 38
APCOA enforcement contract defaults	Cr 61
Total variations within Car Parking Enforcement	Cr 236

14. Parking Shared Service Cr £123k

There is a net variation of cr £123k for the Parking Shared Service mainly due to underspends on staffing as a result of vacancies across both boroughs.

	£'000
Summary of overall variations within Parking:	
Bus Routes Enforcement	53
Off Street Car Parking	54
On Street Car Parking	92
Permit Parking	Cr 64
Car Parking Enforcement	Cr 236
Parking Shared Services	Cr 123
Other Expenditure Variations	3
Total variation for Parking	Cr 221

15. Highways- Including London Permit Scheme Cr £32k

There is a forecast £44k underspend on staffing costs mainly due to reduced hours and part year vacancies.

New Roads and Street Works Act (NRSWA) income is projected to underachieve by £19k. This is made up of a £36k shortfall relating to defect notices as a result of improved performance by utility companies, offset by a surplus of Section 74 income as utility companies are taking longer than agreed to complete works. Income from Fixed Penalty Notices (FPNs) is anticipated to be £8k lower than budget this financial year.

Summary of variations on NRSWA Income:	£'000
Defects	36
Section 74 Notices	Cr 25
Fixed Penalty Notices	8
Total variation for NRSWA	<u>19</u>

There is a total of £18k received from sales at commercial vehicle auctions and other small variations produce a £9k underspend, which includes variations within materials, line of business software and car allowances.

Electricity costs associated with street lighting are anticipated to exceed budget by £20k this financial year. However the next phase of street light upgrades is due to commence shortly which should help to contain electricity costs going forward.

16. Non-controllable Cr £31k

There is a projected £31k overachievement of income within the property rental income budget. Property division are accountable for these variations.

Waiver of Financial Regulations:

The Council's Contract Procedure Rules state that where the value of a contract exceeds £50k and is to be exempt from the normal requirement to obtain competitive quotations the Chief Officer has to obtain the agreement of the Director of Corporate Services, the Director of Finance and the Director of Commissioning and (where over £100,000) approval of the Portfolio Holder and report use of this exemption to Audit Sub committee bi-annually. Since the last report to the Executive, no waivers have been actioned.

Virements Approved to date under Director's Delegated Powers

Details of virements actioned by Chief Officers under delegated authority under the Financial Regulations "Scheme of Virement" will be included in financial monitoring reports to the Portfolio Holder. Since the last report to Executive, no virements have been actioned.

Report No.
ES20009

London Borough of Bromley

PART ONE - PUBLIC

Decision Maker: ENVIRONMENT & COMMUNITY SERVICES PORTFOLIO
HOLDER

**For Pre-Decision Scrutiny by the Environment & Community
Services PDS Committee on:**

Date: 17th March 2020

Decision Type: Non-Urgent Executive Non-Key

Title: Homesdale Road – Proposed Zebra Crossing and Mini
Roundabout

Contact Officer: Muazzam Shahid, Senior Traffic Engineer
Tel: 020 84643333 E-mail: Muazzam.shahid@bromley.gov.uk

Chief Officer: Colin Brand, Director of Environment and Public Protection

Ward: Bickley

1. Reason for report

The purpose of this report is to seek approval to introduce a zebra crossing in Homesdale Road, a mini roundabout at the junction of Homesdale Road with Liddon Road, improved pedestrian facilities at the existing roundabout by Page Heath Villas and also to report back on the results of a public consultation carried out in the Canon / Liddon Road area for proposed CPZ changes.

2. **RECOMMENDATION(S)**

That the Portfolio Holder:

- 2.1 Approves the construction of a zebra crossing as shown in attached plan 12727-01-Proposals. This will improve crossing and walking facilities in the vicinity of four schools.
- 2.2 Approves the installation of a mini roundabout as shown in attached plan 12727-01-Proposals. This will have a traffic calming effect helping to slow vehicles travelling southbound down the hill and northbound coming around the bend. This will benefit vehicles trying to exit Liddon Road.

- 2.3 Approves modifications to the existing roundabout at the junction of Homesdale Road / Tylney Road / Page Heath Villas. This will improve crossing facilities and help to reduce vehicular speeds.**
- 2.4 Notes the results of the public consultation exercise carried out to determine residents' views to proposed changes in the existing CPZ areas and the introduction of a zebra and mini roundabout.**
- 2.5 Delegates any changes to the detailed design to the Director of Environment and Public Protection, in consultation with the Portfolio Holder and Ward Members.**
- 2.6 Approves the spend of £85,000 from the TfL LIP formula funding allocation for Walking Infrastructure within the Capital Programme in 2020/21.**

Impact on Vulnerable Adults and Children

1. Summary of Impact: The proposals will make it easier for vulnerable road users in particular to walk and cross the road in the Homesdale Road Area
-

Corporate Policy

1. Policy Status: Existing Policy:
 2. LBB Priority: Children and Young People Quality Environment Safe Bromley Healthy Bromley:
-

Financial

1. Cost of proposal: £85,000
 2. Ongoing costs: Non-Recurring Cost
 3. Budget head/performance centre: Capital Programme - TfL LIP Formula Funding allocation for Walking Infrastructure
 4. Total current budget for this head: £0.230m
 5. Source of funding: TfL grant
-

Personnel

1. Number of staff (current and additional): 1
 2. If from existing staff resources, number of staff hours: 250
-

Legal

1. Legal Requirement: None:
 2. Call-in: Applicable
-

Procurement

1. Summary of Procurement Implications: Construction work will be completed by LBB's term Contractor for Highways, therefore there aren't thought to be any Procurement issues.
-

Customer Impact

1. Estimated number of users/beneficiaries (current and projected): Residents of local streets and those attending local schools or visiting local amenities.
-

Ward Councillor Views

1. Have Ward Councillors been asked for comments? Yes
2. Summary of Ward Councillors comments: Cllr Smith is supportive of the proposals.

3. COMMENTARY

- 3.1 Background - Homesdale Road is a busy main road connecting Bromley Common with Chislehurst and beyond. Homesdale Road also provides access to a large Tesco store and to the Council's recycling centre at Waldo Road. The volume of traffic using the road makes it difficult for pedestrians to cross.
- 3.2 There are four schools close to the northern end of Homesdale Road: Bickley Primary (Gold travel plan accredited), La Fontaine (Silver accredited), St George's Primary (Silver accredited) and Bickley Park (not accredited). Since the re-location of La Fontaine in 2018 there has been an increased number of parents actively travelling to school from the east of Nightingale Lane. The schools, parents and carers have expressed concerns about road safety on Homesdale Road and the lack of crossing facilities available, in particular near to the mini roundabout at the junction of Homesdale Road with Page Heath Lane. A parent campaign was launched in 2018 to improve the crossing facilities to enable safer routes to schools and the desire for better crossing facilities is incorporated into the school's travel plans.
- 3.3 School Travel - All schools with the exception of Bickley Park Primary are already engaged in various active travel projects such as: Scootsure scooter training, Smart Movers, Road Safety education, Bikeability cycle training as well as other initiatives to encourage healthier travel behaviours such as walking, scooting and cycling to school. Bickley Primary and La Fontaine have also expressed an interest to take part in the Council's new anti-idling campaign.
- 3.4 Combined 2018 hands-up data analysis for the 3 primary schools (excluding Bickley Park Primary) indicates that 43% of pupils are actively travelling to school with a further 20% more pupils preferring to travel actively to school. Improved infrastructure in this area will have a positive impact on modal shift and will create an environment where pupils and parents feel safe to walk to school.
- 3.5 The Council has investigated possible locations for a new controlled crossing over Homesdale Road. The location where a crossing is most likely to be useful, being on or close to the pedestrian desire lines, is close to the junction with Page Heath Lane. Council engineers have therefore designed a zebra crossing with associated traffic calming measures. One associated measure, on the northbound approach to the site of the proposed crossing, is a mini-roundabout at the junction with Liddon Road. This mini-roundabout will also add benefit here at this difficult junction, where the intervisibility for drivers exiting Liddon Road into Homesdale Road is much restricted by a bend.
- 3.6 Walking - The council receives a large volume of requests for new infrastructure to enhance walking and reduce road danger; therefore it is important to prioritise on the basis of potential outcomes such as mode shift and strategic fit. This location is one that would benefit from a new crossing point.
- 3.7 Active Travel - Promoting walking to school is a key Council transport priority in order to reduce peak hour congestion, and to encourage and imbed active lifestyles from an early age. Provision of safer crossing facilities and measures to reduce vehicular speeds will help to accomplish these goals.
- 3.8 Consultation - The Zebra and proposed mini roundabout will result in the loss of approximately 8 parking spaces. There is already concern expressed by residents of Canon Road and Liddon Road that parking for local residents in these Zone C CPZ roads is under pressure. A petition was sent to the Council asking for consideration to be given to creating a new CPZ sub-zone for these two streets, along with part of Homesdale Road. It was therefore decided to consult residents in these streets to see if there was a majority in favour of creating a new CPZ, sitting separately to the surrounding Zone C. The proposal for the new Zebra and mini-roundabout

was communicated to these residents, partly as they would impact on parking and partly to gauge opinion on the perceived benefits of a new crossing.

3.9 A breakdown of the responses for the Canon / Liddon CPZ changes, proposed Zebra and proposed roundabout is shown below.

95 responses were received from from residents:

- 77 residents are in support to of the option to remain part of the existing permit zone
- 11 residents are in support the option to make Liddon, Canon and a section of Homesdale road a part of a new CPZ
- 10 residents are in support of a roundabout
- 6 residents are against a roundabout
- 13 residents are in support of a crossing
- 2 residents are against a crossing

87.5 % of respondees were in favour of leaving the CPZ as it is and as such no further action is recommended.

3.10 Speeding - As part of the scheme at the existing mini roundabout, it is proposed to slow vehicle entry speeds by kerb re alignments, provide new tactile paved crossing points on all arms and resurface the roundabout with high resistance “anti skid” type surfacing. These measures will increase pedestrian confidence in negotiating what is currently an unwieldy junction.

3.11 Zebra Crossing - In response to the concerns of residents and the presence of four nearby schools, a dedicated crossing point in the form of a Zebra crossing is proposed in Homesdale Road.

3.12 Traffic Management Issues - In addition, a mini roundabout at the junction with Liddon Road will address the ongoing concerns of residents who find it difficult to exit into Holmesdale Road because of a bend and fast vehicles travelling down the hill in Homesdale Road. The mini roundabout and associated advanced signing and surface treatments will enhance pedestrian safety and provide a visual deterrent to excessive speeds.

4. IMPACT ON VULNERABLE ADULTS AND CHILDREN

4.1 The proposals will make it easier for vulnerable road users in particular to walk and cross the road in this heavily trafficked location.

5. POLICY IMPLICATIONS

5.1 Outcome 1 of Bromley’s LIP 3 proposes to “Deliver local neighbourhood schemes that respond to local concerns and unlock potential for walking and cycling”

5.2 The Proposals will help achieve our targets as highlighted in Table 7 – Local Borough targets and objectives – L3LT 1.3 - 30% Daily trips originating in the borough made by foot

- 5.3 The Proposals will help achieve our targets as highlighted in Table 7 – Local Borough targets and objectives – L3LT 2.1 - Reduce KSIs amongst vulnerable road user groups by 65% compared with the 2005-2009 baseline
- 5.4 The Proposals will help achieve our targets as highlighted in Table 7 – Local Borough targets and objectives – L3LT 3.1 50% of travel to school trips to be by active modes and 20% by Public Transport

6. FINANCIAL IMPLICATIONS

- 6.1 The proposed works are estimated to cost £85k in the financial year 2020/21. This will be met from the LIP Formula Funding allocation for Walking Infrastructure within the Capital Programme, which is funded by TfL.

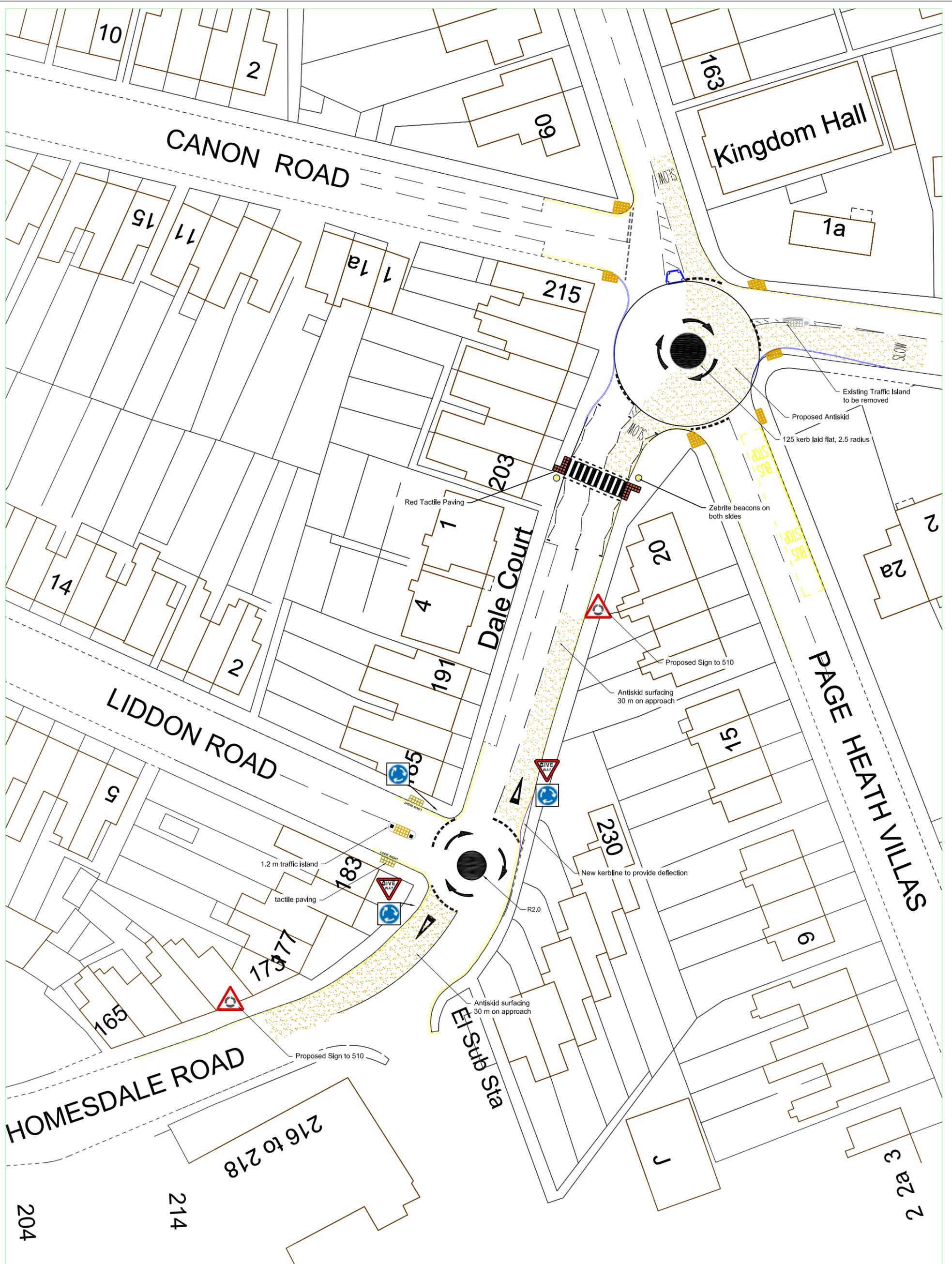
7. LEGAL IMPLICATIONS

- 7.1 A Public Notice would need to be advertised and a 21-day statutory consultation period allowed for any objections to be considered.

8. PROCUREMENT IMPLICATIONS

- 8.1 Construction work will be completed by LBB's term Contractor for Highways, therefore they aren't thought to be any Procurement issues.

Non-Applicable Sections:	PERSONNEL IMPLICATIONS
Background Documents: (Access via Contact Officer)	[Title of document and date]



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Job Title:
Homesdale Road

Drawing Title:
New Mini Roundabout
Proposed Zebra Crossing
Amendments to Existing Roundabout

Bromley
THE LONDON BOROUGH

Environmental Services
Civic Centre, Stockwell Close,
Bromley, BR1 3UH
Tel: 020 8464 - 3333
Fax: 020 8313 - 4555
Email: www.bromley.gov.uk

Nigel Davies
Executive Director of Environment &
Community Services

Scale @ A3	NTS			
Date	14/02/2018			
Drawn by:	MS	Rev	Date	Description
Checked by:	MS	Drawing Number		By Rev
				12727-01-Proposals

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Report No.
ES20010

London Borough of Bromley

PART ONE - PUBLIC

Decision Maker: ENVIRONMENT & COMMUNITY SERVICES PORTFOLIO HOLDER

For pre-decision scrutiny by Environment and Community Services PDS Committee

Date: 17th March 2020

Decision Type: Non-Urgent Executive

Title: Court Road – Pedestrian & Cycling Improvements / Urban Realm Enhancement

Contact Officer: Muazzam Shahid, Senior Traffic Engineer
Tel: 020 84643333 E-mail: Muazzam.shahid@bromley.gov.uk

Chief Officer: Colin Brand, Director of Environment and Public Protection

Ward: Orpington

1. Reason for report

The purpose of this report is to seek approval to introduce a dedicated pedestrian / cycle crossing point in Court Road and a cycle bypass at the adjacent bus stops making them floating bus stops. This proposal will reduce severance between the east and west sides of Court Road, encourage walking and cycling and enhance the local environment with additional tree planting.

2. **RECOMMENDATION(S)**

- 2.1 That the Portfolio Holder approves the construction of measures as shown in attached drawing 12879-03 to install a pedestrian / cyclist crossing point, cycle lanes to bypass the crossing and nearby bus stops, plant new trees in areas of verge reclaimed from consolidation of foot paths.
- 2.2 That the Portfolio Holder gives approval to progress to detailed design and implementation, with the Director of Environment and Public Protection to be given authority to approve final designs, in consultation with the Portfolio Holder.
- 2.3 Approves the spend of £100,000 from the TfL LIP Formula Funding allocation for Walking Infrastructure within the Capital Programme in 2020/21.

Impact on Vulnerable Adults and Children

1. Summary of Impact: The provision of a crossing point will be of benefit to vulnerable adults and children.
-

Corporate Policy

1. Policy Status: Existing Policy: Bromley's LIP 3 proposes to "Deliver local neighbourhood schemes that respond to local concerns and unlock potential for walking and cycling"
 2. BBB Priority: Quality Environment Safe Bromley Supporting Independence Healthy Bromley
-

Financial

1. Cost of proposal: £100,000
 2. Ongoing costs: Non-Recurring Cost:
 3. Budget head/performance centre: Capital Programme – TfL LIP Formula Funding for Walking Infrastructure in 2020/21
 4. Total current budget for this head: £230k
 5. Source of funding: TfL grant
-

Personnel

1. Number of staff (current and additional): 1
 2. If from existing staff resources, number of staff hours: 200
-

Legal

1. Legal Requirement: Non-Statutory - Government Guidance
 2. Call-in: Applicable
-

Procurement

1. Summary of Procurement Implications: Construction work will be completed by LBB's term Contractor for Highways, therefore they aren't thought to be any Procurement issues.
-

Customer Impact

1. Estimated number of users/beneficiaries (current and projected): Residents of the Ramsden Estate in particular
-

3. COMMENTARY

- 3.1 Court Road is a 40 mph road and forms part of the A224 Orpington Bypass, connecting the A21 and M25 motorway at Hewitts Roundabout to the residential and shopping areas in St Mary Cray.
- 3.2 The road splits communities on either side, creating a severance which has been pointed out by local ward councillors. They highlighted the need for a suitable crossing point to help encourage pedestrians and cyclists to use the local parks and amenities, as well as providing a safe crossing point to reach the town centre.
- 3.3 This location strategically connects existing pedestrian pathways and two bus stops. Priory Gardens is located on the west of Court Road and residential areas and St Philomena's Catholic School and Harris Primary Academy Orpington on the east.
- 3.4 The Council receives a large volume of requests for new infrastructure to enhance walking and reduce road danger; therefore it is important to prioritise on the basis of potential outcomes such as mode shift and strategic fit. This led to the design of a new pedestrian and cycling facility as well as a floating bus stop.
- 3.5 The proposed crossing point has been designed to safely accommodate both cyclists and pedestrians, particularly those with prams and on wheelchairs.
- 3.6 The existing cycle facilities at this location will narrow the vehicle running lanes to below standard so the proposals have included diverting these lanes to bypass the new crossing point and the two existing bus stops which pose obvious dangers to cyclists pulling out into fast moving traffic.
- 3.7 The southbound bus stop will also be moved by some 10 metres to prevent posing visibility issues.
- 3.8 As part of the design it is proposed to consolidate the existing pedestrian pathways by removal of sections, construction of new sections and shared spaces. Details are shown in the attached plan.
- 3.9 Any grass verge that is removed will be offset by equal areas that will be grassed and it is also proposed to plant four or five new trees where pathways are removed. This will have a positive impact on the local environment.

4. IMPACT ON VULNERABLE ADULTS AND CHILDREN

- 4.1 The proposals will make it easier for vulnerable road users in particular to walk and cross the road.

5. POLICY IMPLICATIONS

- 5.1 Outcome 1 of Bromley's LIP 3 proposes to "Deliver local neighbourhood schemes that respond to local concerns and unlock potential for walking and cycling"
- 5.2 The Proposals will help achieve our targets as highlighted in Table 7 – Local Borough targets and objectives – L3LT 1.3 - 30% Daily trips originating in the borough made by foot
- 5.3 The Proposals will help achieve our targets as highlighted in Table 7 – Local Borough targets and objectives – L3LT 2.1 - Reduce KSIs among

6. FINANCIAL IMPLICATIONS

6.1 The proposed works are estimated to cost £100,000 in 2020/21. This will be met from the LIP Formula Funding allocation for Walking Infrastructure within the Capital Programme which is funded by TfL.

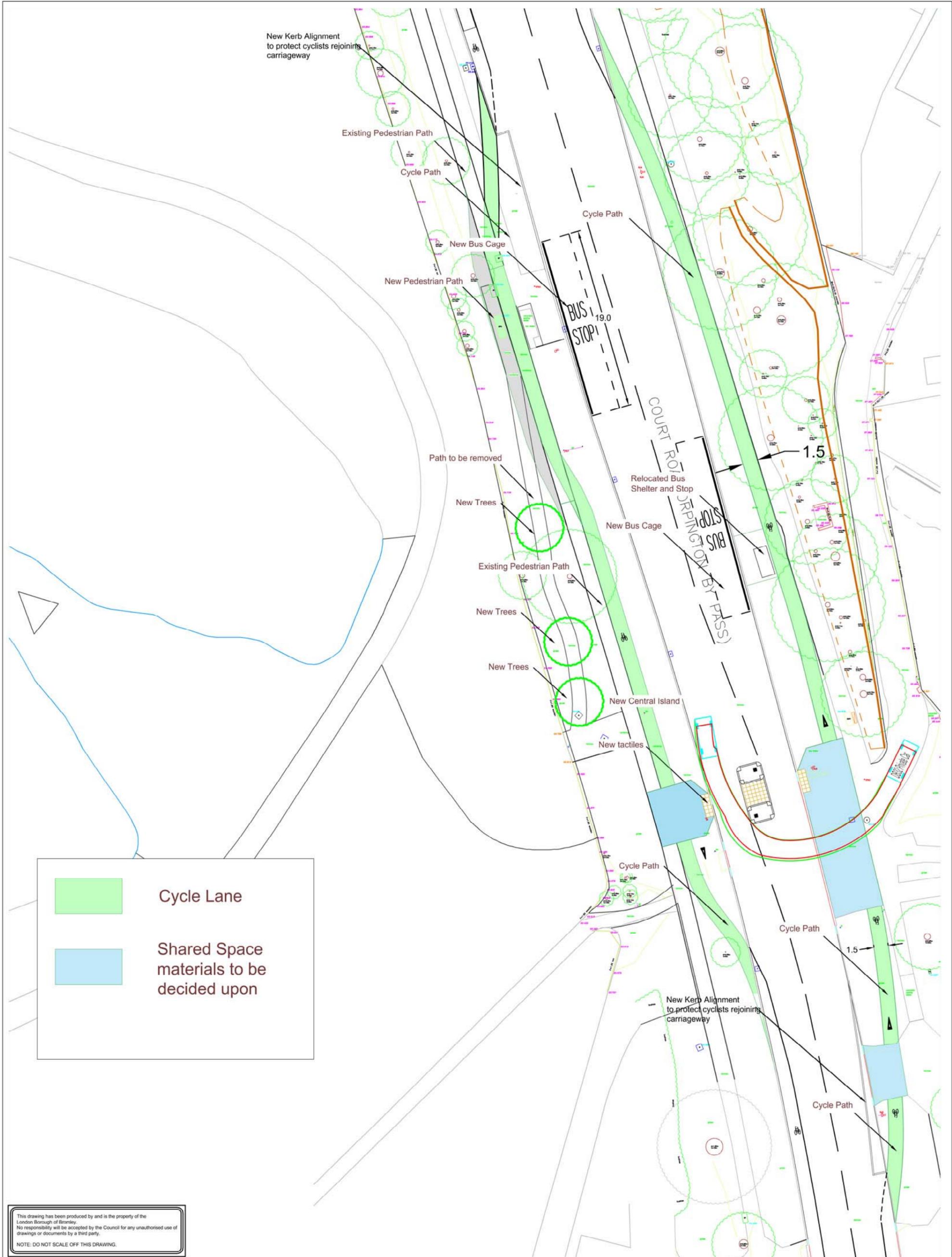
7. LEGAL IMPLICATIONS

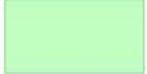
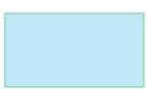
7.1 A Public Notice would need to be advertised and a 21-day statutory consultation period allowed for any objections to be considered.

8. PROCUREMENT IMPLICATIONS

8.1 Construction work will be completed by LBB's term Contractor for Highways, therefore there aren't thought to be any Procurement issues.

Non-Applicable Sections:	Personel implications
Background Documents: (Access via Contact Officer)	



	Cycle Lane
	Shared Space materials to be decided upon

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Job Title:
**Court Road
RSA 1/2**

Drawing Title:
**New Central Island
Cycle Route Realignment
Bus Stop Relocation**


Environmental Services
Civic Centre, Stockwell Close,
Bromley, BR1 3UH
Tel: 020 8464 - 3333
Fax: 020 8313 - 4555
Email: www.bromley.gov.uk

Colin Brand
Director of Environment &
Public Protection

Scale @ A3	NTS	Rev	Date	Description	By
Date	10/01/2020	Drawing Number			
Drawn by:	MS				
Chkd/Appd by:				12879-03	

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Report No.
ES20013

London Borough of Bromley

PART ONE - PUBLIC

Decision Maker: ENVIRONMENT & COMMUNITY SERVICES PORTFOLIO HOLDER

For Pre-Decision Scrutiny by the Environment & Community Services PDS Committee on:

Date: Tuesday 17 March 2020

Decision Type: Non-Urgent Executive Non-Key

Title: CCTV TRAFFIC ENFORCEMENT SYSTEM & ADDITIONAL SCHOOL CCTV ENFORCEMENT CAMERAS.

Contact Officer: Allen Herve, Operations & Contract Manager
Tel: 020 8313 4998 E-mail: allen.herve@bromley.gov.uk

Chief Officer: Assistant Director of Environment

Ward: (All Wards);

1. Reason for report

- 1.1 To recommend a more resilient system for processing data from cameras used to enforce School Keep Clear markings and Bus Lanes.
- 1.2 To recommend the purchase of eight new CCTV traffic enforcement cameras to be used for School Keep Clear restrictions.

2. **RECOMMENDATION(S)**

- 2.1 That the Portfolio Holder agrees to the purchase and installation of eight new School Keep Clear enforcement cameras in response to safety concerns about dangerous driving behaviour outside schools.
- 2.2 That the Portfolio Holder agrees to the proposal to change from an in house server system to a hosted service provided by the incumbent supplier, funded from income generated via parking enforcement, in order to provide a more resilient service.

Impact on Vulnerable Adults and Children

1. Summary of Impact: Parking enforcement includes enforcement around schools within the Borough, which encourages protection for children as they go to and from school. Traffic flow of Bus Lanes forms part of the London implementation plan and enforcement encourages use of this transport method including by children to and from schools.
-

Corporate Policy

1. Policy Status: Existing Policy: LIP
 2. BBB Priority: Children and Young People Quality Environment Safe Bromley Supporting Independence:
-

Financial

1. Cost of proposal: Purchase of cameras £150k
 2. Ongoing costs: Camera licences and relocation cr£3k (2021/22); Server hosting service £17k p.a.
 3. Budget head/performance centre: Capital Programme: Local Transport Priorities; Revenue Budget: Traffic Enforcement
 4. Total current budget for this head: Capital £0.154m and Revenue cr£2.2m (2019/20)
 5. Source of funding: Capital Programme – TfL Grant Funding and Revenue budget 2019/20 & 2020/21
-

Personnel

1. Number of staff (current and additional): One (contracted staff)
 2. If from existing staff resources, number of staff hours: 40hrs (contractors)
-

Legal

1. Legal Requirement: Non-Statutory - Government Guidance:
 2. Call-in: Applicable:
-

Procurement

1. Summary of Procurement Implications: Waiver
-

Customer Impact

1. Estimated number of users/beneficiaries (current and projected): All road & school users
-

Ward Councillor Views

1. Have Ward Councillors been asked for comments? No
2. Summary of Ward Councillors comments: N/A

3. COMMENTARY

School Keep Clear Restrictions

- 3.1 In 2018/19 just five school CCTV cameras were being utilised for enforcement to deter vehicles from stopping on School Keep Clear (SKC) zigzag restrictions outside schools across the Borough. At both the Public Protection and Enforcement PDS on 30th Jan 2019 and Environment PDS meeting on 5th Feb 2019, committee Members requested that Officers consider purchasing additional CCTV cameras for enforcement of SKC markings. Five new cameras were purchased in the spring of 2019 and became operational in September 2019. It is now proposed to purchase an additional 8 new cameras to increase the coverage of the Borough, prioritising high non-compliant schools, which will allow Civil Enforcement Officers (CEOs) to be deployed elsewhere within the Borough.
- 3.2 Utilising Cameras for the enforcement of SKC restrictions is more effective than using CEOs on foot, as drivers often drive away quickly on seeing a CEO, before a PCN can be served. Cameras are rotated around the schools in the Borough but there are only 10 cameras to cover well over 100 schools.
- 3.3 Schools often contact the Council to seek support to discourage the minority of parents at those schools who repeatedly ignore the SKC restrictions, thus increasing the risk for children crossing outside the schools.

Current CCTV Enforcement System

- 3.4 Across the Borough there are currently 21 CCTV cameras deployed to enable enforcement of SKCs (10 cameras) and bus lanes (11 cameras). The existing CCTV IT management platform, known as the vehicle capture messaging system (VCMS), was originally installed to maintain 1 trial camera and has expanded to its present 21 unmanned cameras. At the time of installation in 2015 this was the best value and most robust method of deployment.
- 3.5 The 21 cameras are all connected to a single server that is based at the Bromley Parking office at the Civic Centre via a wireless or land network.
- 3.6 The present hardware is now over 5 years older and has various single points of failure, where an outage within the existing infrastructure or physical environment would stop the entire system immediately. The present broadband width required to transfer the data to produce the Penalty Charge Notices also has a slow connectivity speed, which can cause unnecessary delays in the processing of PCNs.
- 3.7 This system has grown to a significant size and scope and it now requires migration from the current system to a more robust solution.
- 3.8 If a critical failure occurs, Videalert, the incumbent supplier have stated they will support Bromley to recover data where possible and configure a replacement server once sourced, though it is difficult to estimate the actual downtime that would result if the main server fails completely. Revenue would be lost due to such a failure, a present example of a week's downtime would equate to approximately £20k loss of PCN revenue.
- 3.9 To ensure all single points of failure are negated Videalert can provide a hosted service that can be accessed via a web portal anywhere in the country. The hosted service cost will be £600 per annum per camera, total £12,600 per annum or with the additional 8 school cameras a total of £17,400.

- 3.10 A hosted environment would be a resilient virtual server situated in one of the largest data-centres in London. Videalert have also deployed a second data-centre for greater operational load capacity, resilience and disaster recovery to bolster any growing platform/s.
- 3.11 The data-centres have multiple redundant power systems, multiple dedicated and redundant very high-speed internet and data connections and 24/7 access for authorised and validated staff. Additionally the infrastructure has multiple processing and storage systems servicing their customer base maintaining a baseline uptime of over 99%, which is a guaranteed within the Service Level Agreement. Videalert also maintain off-site geo-backup facilities for processing and further disaster recovery.
- 3.12 Transferring the processing of information to a cloud based environment also offers the Council more flexibility in regard to where the cameras are situated and monitored. Officers and the Contractors would be able to access the hosted system via dedicated computers (as the present hardwired review workstation is today), but they would now connect to the hosted environment via Internet Explorer. As the hosted service is a web base portal remote workings at other locations deemed suitable would be possible.
- 3.13 As required under certification by the Secretary of State for Transport each alert/recording of a contravention requires a qualified officer to review each case at the review workstation that is at present hard-wired/fixed within the Civic Centre offices.
- 3.14 The use of a hosted service would allow the review to be undertaken at any location that the Authority approves, therefore allowing a greater flexibility to staff this function, which would provide an additional cost saving with the present enforcement contractor APCOA Parking, who supply staff to review these contraventions. However, this saving will be offset by the additional workload for APCOA in monitoring the suggested 8 new cameras.

Recommendations

- 3.15 As described above, it is recommended that (i) eight additional CCTV cameras are purchased for enforcement of School Keep Clear markings, (ii) the processing of the data from all bus lane and SKC cameras should be undertaken via a hosted, cloud based system, to replace the current server at the Civic Centre, as this is a single point of failure and presents an unnecessary risk.
- 3.16 It is recommended that an award should be made via an exemption from competitive tendering for a contract to Videalert Ltd for the provision of the hosted service and for the purchase of the additional cameras. There are a number of other providers of cameras & software, however only the Videalert software maintenance licence and equipment can be used to operate the current stock of cameras. If agreement is not given to extend the contract with Videalert to provide a hosted service plus additional cameras, then new cameras will need to be procured, along with their associated licences and additional costs.

4. IMPACT ON VULNERABLE ADULTS AND CHILDREN

- 4.1 Parking enforcement includes enforcement around schools within the Borough, which encourages protection for children as they go to and from school. Traffic flow of Bus Lanes forms part of the London implementation plan and enforcement encourages use of this transport method particularly by children to and from schools.

5. POLICY IMPLICATIONS

- 5.1 Outcome 1 of Bromley's LIP 3 proposes to "Deliver local neighbourhood schemes that respond to local concerns and unlock potential for walking and cycling"

- 5.2 The Proposals will help achieve our targets as highlighted in Table 7 – Local Borough targets and objectives – L3LT 1.3 - 30% Daily trips originating in the borough made by foot
- 5.3 The Proposals will help achieve our targets as highlighted in Table 7 – Local Borough targets and objectives – L3LT 2.1 - Reduce KSIs amongst vulnerable road user groups by 65% compared with the 2005-2009 baseline
- 5.4 The Proposals will help achieve our targets as highlighted in Table 7 – Local Borough targets and objectives – L3LT 3.1 50% of travel to school trips to be by active modes and 20% by Public Transport

6. FINANCIAL IMPLICATIONS

Additional 8 SKC cameras

- 6.1 Surveys of vehicles contravening have been undertaken over a two day period for 21 schools not currently covered by CCTV that were known to have high non-compliance.
- 6.2 Based on the number of PCNs issued via the current 10 cameras, the 8 new cameras will be likely to lead to approximately 1,000 new PCNs being served during year 1 with a projected income of £54k based upon the cameras being purchased and installed by the end of May 2020 (this equates to 833 PCNs over 10 months). In year 2, further compliance is expected so numbers are expected to reduce to 750 with income of £48k (full year).
- 6.3 Licence and airtime costs are expected to be £4,200 per camera per annum (totalling £33,600) and £10k per annum for the cost of relocating the 8 cameras once a year (plus inflation). Cameras are relocated approximately once a year as drivers at a site become compliant.
- 6.4 The proposed additional contract value for purchasing eight new cameras and the related software maintenance licence is £150k, to be phased over 2019/20 and 2020/21. This purchase will be met from the Local Transport Priorities capital scheme funded by TfL grant.
- 6.5 The software licence will cost £33,600 in subsequent years with relocation costs of £10,400 to rotate cameras between sites (plus inflation costs going forward).
- 6.6 The annual licence costs of £33,600 (from year 2) and relocation costs of £10,400 (from year 2) will be allocated from the income received from parking enforcement.
- 6.7 The table below summarises the financial implications of this the proposal.

Expenditure and Income	2019/20	2020/21	2021/22	2022/23	2023/24
<i>Capital</i>					
Purchase and installation of 8 cameras	£75,000	£75,000			
Local Transport Priorities funding	-£75,000	-£75,000			
<i>Revenue</i>					
Licence costs		£33,600	£34,400	£35,200	£36,000
Camera relocation costs		£10,400	£10,600	£10,800	£11,000
Estimated income from PCNs		-£54,000	-£48,000	-£48,000	-£48,000
Net Income		-£10,000	-£3,000	-£2,000	-£1,000

- 6.8 The cost of providing a more resilient, hosted service in a cloud based environment for the current 11 bus lane cameras and 10 SKC cameras will be £12,600 per annum. With the addition of 8 SKC cameras the cost of hosting rises to £17,400. These costs will be partially offset by the additional income from the 8 extra SKC cameras, but by £3,000 or less from year 2.
- 6.9 There is a projected net underspend on the overall Parking Division budget this year including a net underspend on enforcement. Within this, there is a forecast underspend of £38k on credit card commission costs and trends indicate that the current level of expenditure will continue. It is proposed that the annual hosting cost is met from this projected ongoing underspending.
- 6.10 However, this position has benefited from the deployment of additional enforcement officers and that level of increased activity may not be sustained into future financial years. Therefore there is some risk that the current increased level of net income is not maintained at a sufficient level to offset the additional costs of the hosting service. This has to be weighed against the risk of failure of the current server and potential loss of income that would result.
- 6.11 It is likely that a new contract for all traffic enforcement cameras will be implemented from April 2024, with procurement processes starting in 2023, and a review of options for the hosting service will be included in this exercise.

7. LEGAL IMPLICATIONS

- 7.1 Various statutory powers including the Road Traffic Regulation Act 1984, Road Traffic Act 1991, London Local Authorities Act 1996, The Civil Enforcement of Parking Contraventions (England) General Regulations 2007, London Local Authorities Act 1996 and in particular the Traffic Management Act (TMA) 2004 provides local authorities with the powers to undertake traffic enforcement through the use of CCTV cameras. The Deregulation Act 2015 provides an amendment to the TMA 2004, which makes Regulations that, restricts/allows the use of CCTV cameras for parking contraventions as identified in this report
- 7.2 As the value of the proposed contract (£150k + £182k) is above the EU threshold level for supplies and services (£189,330) the contract does need to be tendered in full compliance with the Public Contracts Regulation 2015 (the Regulations). However Regulation 32 (2) (b) (ii) permits an award of contract by use of the negotiated procedure where for technical reasons competition is absent but only where no reasonable alternative or substitute exists. An exemption from tendering requirements under Rule 8 of the Council's Contract Procedure Rules (CPR) can be granted under CPR Rule 13, if there is justification to do so. The report sets out the justification for seeking to award a contract direct without going through a competitive tender process under the Regulations and the CPR's. The authorisation process is covered in the Procurement Comments of this report.
- 7.3 Officers will need to ensure that the proposed terms and conditions of contract are acceptable and where necessary legal advice obtained from Legal Services.

8. PROCUREMENT IMPLICATIONS

- 8.1 This report seeks to award a contract for licences to Videalert for a duration of four years at a value of £332k, which includes both one off installation costs and license and relocation costs as set out in paragraph 6.6 of this report.
- 8.2 The proposed procurement route is identified under Regulation 32 b ii (technical reasons) of the Public Contracts Regulations 2015 and the full justification provided in the contents of this report, specifically at paragraph 3.16 above.

8.3 This action is permissible under the general waiver power of the Council (CPR 3.1). For the purposes of authorisation, the cumulative value must be considered, taking into account previous spend of £316k, making the total value £648k. The Council's specific requirements for authorising an exemption are covered in CPR 13 with the need to obtain the Approval of the Portfolio Holder following Agreement by the Chief Officer, the Director of Commissioning, the Director of Corporate Services and the Director of Finance for a contract of this value.

Non-Applicable Sections:	PERSONNEL IMPLICATIONS
Background Documents: (Access via Contact Officer)	[Title of document and date]

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Report No.
ES19072

London Borough of Bromley

PART ONE - PUBLIC

Decision Maker: ENVIRONMENT & COMMUNITY SERVICES PORTFOLIO
HOLDER

For Pre-Decision Scrutiny by the Environment & Community Services
PDS Committee on:

Date: 17th March 2020

Decision Type: Non-Urgent Non-Executive Non-Key

Title: AMENDMENT TO THE PUBLIC SPACES PROTECTION ORDER
(PSPO), DOG CONTROL & FOULING ENFORCEMENT
POWERS

Contact Officer: Toby Smith, Street Enforcement Manager
Tel: 020 8313 4870 E-mail toby.smith@bromley.gov.uk

Chief Officer: Colin Brand, Director of Environment & Public Protection

Ward: All

1. Reason for report

This report sets out the proposed changes to powers of the Council relating to those in charge of dogs through the implementation of a Public Spaces Protection Order (PSPO) under Section 59 of the Anti-social Behaviour, Crime and Policing Act 2014.

2. **RECOMMENDATION(S)**

The Environment & Community Services Portfolio Holder is requested to:

- 2.1 Approve the amendment to the current Public Spaces Protection Order (PSPO) under Sec 59 of the Anti-Social Behaviour, Crime and Policing Act 2014, that a person can be in charge of no more than four (4) dogs at any one time in a public place unless they have a licence.
- 2.2 Approve the introduction of a professional dog walking licence for persons wishing to walk more than 4 dogs and up to a maximum of 6 dogs at a cost of £200 per annum.
- 2.3 Approves the increase in the current Fixed Penalty Notice of £80 to £100 for all offences (controls) contained in the PSPO.

Impact on Vulnerable Adults and Children

1. Regulating the activities of dogs and those in charge of a dog affect all residents including vulnerable adults and children. Consideration of any additional impacts on groups of residents is considered when exercising the use of Public Space Protection Orders. The proposals contained within this report will make parks and open spaces safer for those who are vulnerable living in the borough.
-

Corporate Policy

1. Policy Status: Existing Policy:
 2. BBB Priority: Quality Environment Safer Bromley
-

Financial

1. Cost of proposal: £3000 will cover the initial costs for the new signage in parks and public spaces highlighting the changes to the PSPO, plus the changes advertised in the local press, libraries and at Bromley Civic Centre.
 2. Ongoing costs: The enforcement of the PSPO is contained within the existing Parks Security contract. The administration of the licencing will be covered by the income generated.
 3. Budget head/performance centre: Not applicable
 4. Total current budget for this head: Not applicable
 5. Source of funding: From the Parks Security contract 063000 300900000
-

Personnel

1. Number of staff (current and additional): Not applicable
 2. If from existing staff resources, number of staff hours: Not applicable as hours are within current parks security contract
-

Legal

1. Legal Requirement: Non-Statutory - Government Guidance Anti-Social Behaviour, Crime and Policing Act 2014 (Prescribed Offences and Penalties etc. Regulations 2006
 2. Call-in: Not Applicable
-

Procurement

1. Summary of Procurement Implications: N/A
-

Customer Impact

1. Estimated number of users/beneficiaries (current and projected): Borough wide impact on dog-owners, non-dog owners, residents, children, families and tourists visiting LBB parks and public spaces.
-

Ward Councillor Views

1. Have Ward Councillors been asked for comments? Not applicable
2. Summary of Ward Councillors comments: Not Applicable

3. COMMENTARY

- 3.1 The Anti-Social Behaviour, Crime and Policing Act 2014 provides local authorities with powers to create a Public Spaces Protection Order (PSPO) where they are satisfied that activities carried out in a public place have had a detrimental effect on the quality of life of those in the locality.
- 3.2 Problems caused by the activities of dogs and those in charge of a dog were previously addressed through the Dog Control Order (as part of the Clean Neighbourhoods and Environment Act 2005) which covered dog fouling, the control of dogs and the exclusion of dogs from specified areas (including the borough's play areas).
- 3.3 The PSPO brings the Council's existing orders into alignment with the provisions of the Anti-Social Behavior, Crime and Policing Act 2014 and will enhance their impact. Stray dogs and dogs dangerously out of control can be effectively dealt with by other existing legislation.
- 3.4 The majority of dog-related complaints received by the Council refer to dog fouling, dogs off the lead in areas designated for exclusion and include the number of dogs a person may oversee at any one time. In determining the extent of the new PSPO, consideration has been given to balancing the interests of those in charge of dogs against the interests of those affected by the activities of dogs. In doing so, it is recognised that the public, and specifically children, should have access to dog-free areas and areas where dogs are kept under strict control. In addition, those in charge of dogs require access to areas where they can exercise their dogs without undue restrictions. A failure to give due consideration to these factors could make a PSPO vulnerable to legal challenge.
- 3.5 Bromley Council currently licence businesses that provide day care services for dogs, i.e. where the dog is looked after at the home of the operator during the day and providers of dog overnight boarding services.
- 3.6 Currently there is no requirement for the provider of a dog walking service to be licenced and they can use the Boroughs parks and open green spaces unregulated.

Consultation

- 3.7 A period of public consultation was undertaken as from the 10th December 2019 to the 5th February 2020. Key stakeholders such as the Dogs Trust, The Kennel Club, The RSPCA, Police, RNIB, Park Friends, and Street Friends were consulted. Posters were displayed at prominent park sites, libraries, Civic Centre main reception and notification was displayed in the local press and on the Councils website.
- 3.8 **131** responses were received from stakeholders and members of public which have been broken down into the following; **90** Disagreed with the proposal; **35** Agreed with the proposal; **3** wished for a more stringent reduction; **3** responses were undetermined / not clear. A full list of comments is attached in Appendix A.
- 3.9 The vast majority of those who disagreed with the proposal were professional dog walkers and their clients who argued that such a restriction of 4 dogs only would severely impact their businesses and in some cases force them to stop operating.
- 3.10 Of those who disagreed with the proposal many did agree that some form of control and regulation should be initiated by the Council such as the issuing of a dog walking licence to deter, prevent, stop unofficial dog walking individuals. They suggested that they would be willing to subscribe to a professional dog walkers licencing system and pay an annual fee.

3.11 The administration of licensing would involve an online application system where applicants would be vetted and required to provide details of insurance, with a requirement to carry their licence at all times when walking their dogs and adhere to a dog walkers code of conduct.

Application Process

3.12 An online application system would be introduced where upon applicants will be vetted and required to provide details, of insurance and a commitment to carry their licence at all times when walking their dogs and adhere to a dog walkers code of conduct.

3.13 Key stakeholders such as DEFRA, RSPCA, The Dogs Trust, dog walking / caring insurance companies, all recommend that no more than 6 dogs are walked by a person at any one time.

Existing PSPO Controls

3.14 Existing offences under the current PSPO (section 59 of the Antisocial Behaviour, Crime and Policing Act 2014) within Bromley are as follows:

- (a) Failing to remove dog faeces;
- (b) Not keeping a dog on a lead;
- (c) Not putting, and keeping, a dog on a lead when directed to do so by an authorised officer; and
- (d) Permitting a dog to enter land from which dogs are excluded (i.e. childrens play areas).

Proposed Amendment to PSPO Controls

3.15 It is proposed to amend and introduce a new offence to the existing PSPO, as follows:

- (a) Limit the number of dogs a person can oversee to four (4) dogs per person.
- (b) Introduce a dog walkers' licence for those persons wishing to walk up to six (6) dogs.

3.16 Table 1 shows current benchmarking of other Local Authorities in relation to numbers of dogs allowed per person.

Table 1

Local Authority	No. of Dogs Limit	Licence/Permit Scheme/Cost	Comments
Bexley	None	No Licence and no fee	No restriction
Brent	4	No permit / licence System	n/a
Croydon	4	No permit / licence System	Awaiting the outcome of the Bromley decision
Dartford	No restriction	None	No Restriction
Ealing	6 dogs	Licence required	n/a
			1 x Royal Park where

Greenwich	4	Looking into licencing Professional Dog Walkers (PDW)	PDW must be licenced at £300pa
Haringey	6	PSPO	n/a
Lambeth	2	A licence is required to walk more than 2 dogs	Lambeth has High incidents re: Status Dog issues hence the restriction
Lewisham	4	No permit / Licence system	n/a
Richmond	4	PDW Licence £110 max 6	Only 18 licences issued per year
Southwark	6 (only 3 off lead at one time)	No permit / licence System	n/a
Sutton	No restriction	No permit / licence System	No restriction currently, but Sutton are considering implementing a restriction
Tandridge	None	None	No dog control order or PSPO
Tower Hamlets	4	No permit / licence System	n/a
Wandsworth	4	Free Licence but looking to apply charges	Wandsworth only issue 50 licences for the borough.

Proposed FPN Price Increase

3.17 It is also proposed to increase the Fixed Penalty Notice (FPN) for all dog related offences from £80 to £100 (maximum fine level for FPN) for all controls contained in the PSPO. The fines are payable within fourteen days of issue and failure to do so may lead to prosecution. The maximum fine on prosecution for offences under these Orders is currently set at £1000 which may be given upon conviction.

Areas of Land to which PSPOs can be applied

3.18 The land subject to PSPO can apply to any land which is open to the air and to which the public have access. For the purposes of enforcing dog control offences, it includes any length of highway or any other road to which the public have access. This is a wide definition and includes not only public rights of way (including footpaths), but also ways to which the public has access by permission of the landowner, rather than by right. It therefore includes roads and footpaths through private land, provided the public has access to them.

3.19 A complete listing of the parks and open spaces locations designated for the PSPO is detailed in Appendix B of this report.

Exceptions and Exemptions to the PSPO

3.20 There are exceptions to all PSPOs if the person who is in control of a dog:

- (i) Has a reasonable excuse for failing to comply with an Order. This would include those responsible for dogs such as police dogs, which are on land to investigate or prevent crime. In such cases it will be for the authority to decide whether to pursue cases where this defence is used. The Courts will then determine whether someone had a reasonable excuse for failing to comply with a PSPO.
- (ii) Acts with consent of the person who owns or is otherwise in control of the land.

3.21 PSPOs provide exemption cases for registered blind people, deaf people and for other people with disabilities who make use of trained assistance dogs. Anyone with any type of assistance dog is not subject to a PSPO which excludes dogs from specified land in respect of his or her assistance dog. In addition, anyone with a registered disability that would prevent him or her from being aware of, or removing dog faeces, is similarly exempt from a PSPO regarding the fouling of land.

Notification of the Proposed Changes

3.22 There is a legal requirement to place signs on land to which a new order applies, informing the public that land is subject to an order. For example, if the proposal is approved to make an Order restricting the amount of dogs to four (4) a person can walk, permanent signs will be placed at the entrances, gates and barriers to the parks. Permanent signs will be erected informing where a PSPO applies to a large area of land or for every street.

3.23 The Antisocial Behaviour, Crime and Policing Act 2014 Sec 59, requires that before an order is made, the authority has published a notice describing the proposed order in local newspaper, libraries and Bromley Civic Centre, inviting representation on the proposal. Key stakeholders such as the Dogs Trust, The Kennel Club, The RSPCA, local Friends of Parks and Street Friends, the Police and the RNIB will all be consulted. At the end of the consultation period, the authority must consider any representations that have been made and then decide when the order will come into force. It is envisaged that if the PSPO is approved it will be in place by December 2020 to allow for the setting up of the on line application system, method of payment / financial administration, signage and stationery.

4. IMPACT ON VULNERABLE ADULTS AND CHILDREN

4.1 Regulating the activities of dogs and those in charge of a dog affect all residents including vulnerable adults and children. Consideration of any additional impacts on groups of residents is considered when exercising the use of Public Space Protection Orders. The proposals contained within this report will make parks and open spaces safer for those who are vulnerable living in the borough.

5. POLICY IMPLICATIONS

- 5.1 Increased enforcement action is a key aim in “Building a Better Bromley” in improving a safe and quality environment for the public.

6. FINANCIAL IMPLICATIONS

- 6.1 The inclusion of the PSPO will have some financial implications for the production and administration of the fixed penalty notices, advisory leaflets and publicity of the order in local newspapers and on signage. These costs are likely to be in the region of £3000.
- 6.2 Under the current DEFRA guidelines for fixed penalty notices, all generated income must be ring-fenced for enforcement initiatives and in the first instance it is proposed that any sums recovered would be used to off-set the set-up and contractual costs. Costs will therefore be contained within existing revenue budgets.

7. PERSONNEL IMPLICATIONS

- 7.1 The enforcement of the legislation designated on the highway would be carried out by enforcement officers within Environment and Public Protection (Streetscene and Greenspace Division) and the Council’s Parks Security service provider.
- 7.2 The powers to control dogs within designated areas, including parks and recreational areas, would be carried out by the current Park’s Security service provider as part of their existing contract. Contract administration staff within the Parks Security contract will be responsible for recording the issue and any amendment or cancellation of fixed penalty notices.

8. LEGAL IMPLICATIONS

As set out in the body of this report.

9. PROCUREMENT IMPLICATIONS

There are no implications.

Non-Applicable Sections:	[List non-applicable sections here]
Background Documents: (Access via Contact Officer)	1. Clean Neighbourhoods and Environment Act 2005 (S55 and S56) http://www.legislation.gov.uk/ukpga/2005/16/contents 2. SI 2006 No 798 – The Dog Control Orders (procedures) Regulations 2006. http://www.legislation.gov.uk/uksi/2006/798/contents/made 3. The Anti-social Behaviour, Crime and Policing Act 2014 http://www.legislation.gov.uk/ukpga/2014/12/contents/enacted

Responses to the proposal to limit a person to walking 4 dogs at a time in a public space.

Agree with proposal (35)

With regards your above mentioned email, I am confirming that I am in agreement with proposed order.

I just wanted to comment regarding the post I have seen below. I whole heartedly agree with this as I walk my dogs over the fields at Farnborough which has now become 'unpleasant' and sometimes scary due to the large number of dogs being walked at one time. I continually see dogs which are not under control and nowhere near their dog walker, that petrify my 2 small dogs. The other problem is more than one dog walker walking with other dog walkers so there can be a pack of 10-12 dogs coming towards you which is both intimidating for my dogs and myself.

Although I believe the additional offence is sensible, I have concerns that the level of fine will still not provide a sufficient deterrent and that there are insufficient available resources to effectively enforce the protection orders. That being said, it is at least an attempt to address the serious issue of individuals walking large numbers of dogs which are clearly out of control.

Please see attached for details of new proposals from the Council with regard dog walkers in public places. I hope you will agree with me that it's a good move and it should be implemented sooner rather than later.

Regarding the proposals to limit dogs to no more than 4 per person I (as a dog lover) am entirely in agreement for the following reasons.

1. It's difficult enough to clear up every time after one dog, sometimes we see dog walkers with 11-14 dogs. They clearly cannot clear up after them all.
2. For reasons of safety (both human and canine) it is better to have a limit on the number of dogs allowed. I've seen examples of dogs attacking other dogs and people through lack of control and dogs going missing as the dog walker hasn't kept a proper eye on them.
3. Having had the lunches of at least two members of our Friends work party at Jubilee Park stolen and consumed by dogs in large groups that's another reason to limit them!

Good idea to govern the number of dogs, due to the Walker needing to be in control of the animals. I would like to suggest an addition to your first point / law. Failing to pick up after your dog has fouled. The addition being 'picking up 'and disposing of, in an official bin' or words to that effect. I volunteer with Friends of HighElms and we so so often come across Poop bags strung up on the lower branches rather than being disposed of.

I have seen your proposal to limit the amount of dogs under the control of one person. I would very much like to support this very sensible proposal. I do wonder though how it can be enforced. Rangers are very thin on the ground and, even if they saw someone breaking the bylaw, they may

be reluctant to approach a pack of dogs. So the proposal is sound in principle, but perhaps lacking in realistic action.

I am writing on behalf of our group in support of the proposed amendment on dog control offences, dated 10th December.

We have had a few cases where people have brought dogs into 'dog free' areas of parks, despite these areas being clearly signposted. Sometimes when challenged they have either denied seeing any signs, or in at least one case become abusive. Despite dog waste bins in appropriate parks, and dog waste bag dispensers in a couple of them we do have occasional examples of continued dog fouling, especially on College Green. We also recognise the issue of unlicensed professional dog walkers.

We hope that the effective implementation of this new order will go some way to eliminating the problem. We look forward in continuing to work with both Idverde and your enforcement team in this matter.

I would like to say that I agree to the proposal to introduce the new offence and increase the fixed penalty in the control of dogs on public land.

I think it is a sensible change for Bromley Council to make a limit of 4 dogs per walker mainly because when a person is walking many dogs at the same time they are often unable to spot where / when a dog leaves a mess in our parks and playing fields and thus not clean it up.

I would also suggest that Dogs should not be allowed to be walked on the Alexandra Park playing fields as we often find dog mess on the pitches which is pretty disgusting also has serious health implications / risks for children who play football on these pitches.

It is worth the Council reviewing the many diseases that children and adults can pick up from playing on pitches that have been soiled by dogs. I love dogs but I think a few selfish owners could do with some further guidance and sadly appropriate penalties if they won't behave themselves.

Looking at proposals they all sound reasonable and useful. We don't recall us having much issue with the professional dog walkers with multiple dogs but feel walking more than 4 dogs could lead to issues keeping control of them all. I know we had some talk a while ago around PCSO's being able to utilise the council powers. If this can be the case I could see them being a handy tool in tackling a bit of ASB or giving us options when we have dog on dog attacks, they tend to always be off leads. We would need to get a bit of knowledge out regarding areas etc.

I appreciate your efforts to introduce dog controls on public land. I run through Darrick Woods two or three times a week. I have no problems when individual dogs are let off the lead and I have never been attacked by a single dog. Most dog walkers are responsible owners. I have, however, been attacked by dogs which have been let off the lead by professional dog walkers. Dogs have a pack instinct and it is more difficult for a dog walker to control them when they are off the lead.

I have also been sworn at by professional dog walkers when I point out to them that they are legally obliged to keep their dogs under control.

Your efforts to reduce packs of dogs to four only are welcome. This will help runners through the park and reduce the incidence of single dog walkers having their pets pounced upon.

I like to see and meet dog walkers and their dogs in our parks, in general they make my life better.

A dog walker as just posted your email address asking to help them fight the planned change from a maximum of 6 dogs down to a max of 4 dogs. Sadly I totally agree with the planned reduction. I am a dog owner myself and have seen more than once careless dog walkers not picking up, walking in groups (ending up with HUGE packs of dogs) or simply having no control over them. 4 is my opinion the utter maximum one can safely walk in a busy London park. I totally support Bromley's plan. I am not a Bromley resident, but live in Crystal Palace, meters away from the park, hence walk my dog in the park which belongs to Bromley. I am actually quite shocked that in Bromley 6 dogs per walker are still allowed which I wasn't aware of, I thought 4 was a London wide decision.

I think it is a good idea to limit them to 4 dogs.

I am writing in support of your proposal to limit the number of dogs walked together by one person to four, and to increase the fine should this legislation be ignored.

I am aware of one dog walker who is trying to drum up support to contest your proposal, stating that it would detrimentally affect her business and that it's not fair. This walker says she walks no more than six dogs at a time, yet I have seen her many times with 7, sometimes 8 dogs. Her own dog was killed on the railway track some years ago, and I have come across one of her clients' dogs, running loose in the road when she lost it in Elmstead woods when it ran away from her.

I feel the number should definitely be restricted to four dogs maximum per person. I also feel I should say I have two dogs of my own and have had dogs for over twenty years, so I am not only a dog lover but very experienced around them. I have become increasingly concerned in the last five years that these dog walkers are getting more and more blasé and irresponsible towards their charges.

I do hope your proposal is successful.

Hope you are well and of course our best wishes from the Friends of Mottingham Woods for 2020.

In regards to Bromley Council's proposal to introduce an additional offence prohibiting one walker to be in charge of more than four dogs we would support the proposition. We also, currently have concerns from users about the large numbers of dogs inadequately controlled. Some are attracted from out of borough because it is my belief we have always to date adopted a more liberal approach.

As I hope your intelligence reflects, we continue to have far less problems in Upper Marvels and Elmstead Woods around motorbikes and rubbish, although the part that borders Elmstead Lane continues to be an attraction.

I note with approval the consultation on adding the dog walking numbers to the offence list and the increased fine.

We at the Chislehurst Society have received many complaints and concerns about the lack of control that dog walkers have and the increasing numbers of dogs seemingly allied to only one person.

We welcome this directive but obviously question the 'policing' of the actuality as it will only have

an effect if penalties are known to be implemented.
Thank you for taking this issue seriously.

When walking my (one) dog in Cator Park there is a male dog walker with up to seven dogs on occasions .At Sparrows Den, W .Wickham, I regularly see two women with as many as 13 dogs between them, all running free whilst the women are busy talking. I support this ban.

I am writing on behalf of the Friends of Scadbury Park re the above consultation notice we received.

We have discussed this matter and are in favour of the proposals. In Scadbury we suffer from dogs not being on leads but of more concern there are often 'professional dog walkers' in the Park with many dogs under their care often 4/5. Any action to help with this would be welcomed. We understand that in some London boroughs professional dog walkers have to be licensed and pay a fee to be registered. We wonder if this was considered by Bromley as it would be another check and limit on the number of dogs an individual could have in their care.

I was so pleased to see your notice in Well Wood about the implementation of how many dogs a dog walker can walk at one time. My previous dog had two legs broken and numerous bite marks on her body. Last year I was walking my 5 month old puppy when a dog walker who had six dogs approached us and two of her dogs proceeded to try and mount my dog and then they chased her away. Luckily another lady in the wood saw my dog running away and picked her up which I was grateful for as it was near a road. I can't see how it it's possible for a woman in her 60's to control six dogs. I did phone the council and report it but they only put me through to lost dogs which wasn't really helpful. It really is quite intimidating when walking your dog to suddenly be surrounded by six other dogs. Some of the dog walkers come from Croydon because there is a limit to the amount of dogs a dog walker can walk in that area. I was wondering does this rule apply to Sparrows Den too. I hope you do decide proceed with this rule.

Brilliant. Thank you for your work on the new dog order. I'm very pleased that one person isn't allowed to walk more than four dogs. I agree it's impossible to watch more and unlikely to be able to clear up all the mess.

This is the best local news for a while. I like dogs but sensibility and common sense is what gives this order it's strength. Well done.

I write in response to the proposals to introduce additional offences in relation to the control of dogs on public land.

I read with interest that the original offences do not cover "failing to control your dog in an open space". It was my understanding that this is a requirement of people taking their dogs out into open spaces?

If my understanding is in correct please could we amend the new offence to read "being in charge and control of more than 4 dogs per person in a public place".

I believe that most people are concerned with the control element of people walking any number of dogs and it would be my wish to see controlled dogs in the parks be in on or off lead and in any number.

I agree with the increase in fines, but would also urge for more patrols and monitoring of the rules to make sense and ensure adherence to them.

The Friends of Darrick & Newstead Woods fully support Bromley Council's proposal to restrict the number of dogs professional dog walkers can take at one time, plus having fines for people who don't clear up dog mess; our concern is how it will be policed and by who.

As a responsible dog owner, I fully endorse Bromley Council's proposals with regards to introducing an increase in fixed penalty notices and the new offence.

In fact, I wish the law would go further in that it was mandatory for all dog owners to keep their dogs on a lead whilst in public areas and thus maintain "proper" control of their animals at all time.

In my experience, I often witness owners busy chatting with other dog owners, paying no or little attention to what their dogs are doing, often being left to their own devices & /or causing a nuisance to other dogs who are being properly "controlled" whilst being walked on a lead.

The fact that dogs are allowed to roam parks off the lead, enables owners to ignore the fact that their dog has defecated and even if they have the intention to "pick up", I find it very hard to believe that they actually do, often because of the logistics to locate said item, because of the distance between the dog and its owner.

Surely it speaks for itself, the more dogs a person has on or off a lead the more difficult it becomes. I don't want to generalise, as I am sure that many professional dog walkers and others who allow their dogs off of the lead, manage to complete said task.

However, if dogs are kept on leads at "all times" it would make this more manageable. Some dog owners may express concerns that by keeping a dog on a lead they are not being exercised properly, but some retractable leads extend 8m or more.

Although I am aware that there are "council" notices on the entry / exits to parks, I fear that many dog walkers may not have read or are aware that they are there.

Should you and Bromley council be successful in your efforts to obtain said orders, it would be nice to see Wardens policing said parks so the message gets out there.

I agree to the introduction of the additional offence being consulted on and the increased fine:

- Being in charge of more than 4 dogs per person in a public place
- We propose to increase the fixed penalty offence from £80 to £100 for all offences.

I trust that you will employ sufficient officers to enforce this.

Happy to see this new offence control introduced and for the fine to be increased. I myself have 2 little dogs and often notice, mainly dog walkers singularly walking several dogs of all sizes and struggling to maintain control of them. I worry how large numbers of dogs can also be transported safely if a vehicle is used to travel to and from public places.

I'm happy with the introduction of the further offence but do not think the fine should be increased. In fact I'd be happy to see it reduced as I think £50 would be a sufficient deterrent.

I'm also assuming that your authorised officers are reasonable in their enforcement and that there is a robust appeal process including taking into account the circumstance of the incident and

the personal circumstances of the person being fined.

For info I am not a dog owner and the parks I generally use are Norman Park and Whitehall Rec.

Excellent suggestions

Completely support this initiative.... have noticed an increase in dog fouling around Marian Vian school which also adversely affect young school children as well.

Dog nuisance & fouling completely agree with the fifth item and fine.

As the father of a child terrified of dogs, I welcome your proposal to restrict the numbers of dogs per person to 4. I often encounter issues with dog walkers and my daughter even with 2 dogs, owners are unable to fully control their dogs when passing a child who is clearly terrified. Even on a lead, the space required to walk 4 dogs would fill the width of most paths and again cause problems when passing.

I would however comment that I would like to see the age of the person in charge be set a sensible level, to prevent the new rule circumvented (i.e. 8 dogs being walked with an adult and minor).

I should also like to comment that many dog walking businesses make use of the parks for commercial gain and should be further restricted or at least registered with the council to limit access to public green spaces.

I agree that a new offence of one person being in charge of more than four dogs should be implemented as the issue of uncontrolled groups of dogs needs to be addressed. I also agree with the proposal to increase the fixed penalty fine from £80 to £100 to act as more of a deterrent - I would even suggest the higher figure of £120 if possible as reference to that higher amount would I think have a greater impact.

I am a resident of Aynscombe Angle in Orpington.

As you know, this is adjacent to Priory Gardens.

While I support responsible dog ownership in all respects listed on your consultation letter dated 10.12.19, I do strongly feel that there are compromises and understandings to be reached over how we can genuinely prioritise the safety and upkeep of these public spaces.

I would like to ask you to consider the other factors that encroach on the above, that in many cases outweigh the detrimental effects caused by dogs and their owners.

1. The park is consistently populated by groups of men consuming large amounts of alcohol followed by public displays of inebriation. In general, these individuals aren't threatening, however, despite sitting on benches that have bins next to them, they leave plastic bags, ring pulls, cans and bottles behind.

2. Before Christmas, I had to report a man who was sitting on the steps of the walled garden to one of the rubbish pickers as he was openly pleasuring himself.

3. The ponds are absolutely full of discarded rubbish. It is so upsetting to see the waterfowl swimming through this, especially in key places such as by the bus stop at the end of the High

Street (opposite the petrol garage).

4. There is consistently smashed glass on the pathways. One patch of this has been there for at least two months. I reported this today to one of the rubbish pickers (this is what he called himself so I hope that's the correct term!).

5. I have witnessed, on two occasions, young boys driving mopeds around the park. What can be done to prevent this as it's completely unacceptable?

6. There are consistently groups of people hanging around in the car park behind Aynscombe Angle, using drugs and leaving their paraphernalia behind. Again, what is being done about this?

7. Finally, in order to access Priory gardens without walking through the no dog zone, I would either have to walk up Church Hill or along the High Street and use the entrance on the corner of the High Street and Court Road. This is completely nonsensical for me and all the other residents, as the entrance behind Aynscombe Angle is directly next to my house.

The times that I have walked along Church Hill, which has a very narrow pavement on only one side, I have experienced people speeding and driving aggressively and it feels extremely unsafe. One group of men in a 4x4 mounted the pavement and nearly knocked me down and another driver was speeding around the corner by Bark Hart Road so fast that the back of his car span out and hit the pavement 3 feet in front of me.

For this reason, I use the path that connects the dog enclosure to the car park behind Aynscombe Angle which would technically warrant a fine. Something I feel would be highly unjust for myself and the other dog walkers that do this for their own safety.

I realise that rules are important and that there will always be people letting the rest of us down but I would like to see more positive campaigns in place to encourage everyone to respect our public places rather than penalties focusing on a narrow group of people who are only a small part of a wider issue.

I would be happy to be part of an initiative that recruits the community to support the upkeep and protection of our public spaces but it always helps to have a figure such as yourself kick-start things so that the message can reach the widest audience possible.

I am happy to be contacted in relation to this and look forward to hearing from you.

I have recently seen a post regarding the reduction of the number of dogs being allowed to be walked at one time off leads by dog walkers.

I'm not sure where in the process this or any updates on the matter. However, I would like to voice my support for this change. I have recently been running in the park with my well behaved 1 year old dog; we were met by a lady walking 6 dogs off lead, 3 of which proceeded to aggressively chase and bark at my dog, which lead her to run away as they chased her around the lake. I spent around 5-10 minutes trying to locate my dog, she turned out to be in a bush, tail between her legs, scared stiff. The lady attempted to get the dogs back on leads; however, it was clear she had absolutely no control over the 6 dogs. I completely agree that 6 is far too many, especially when they are not yours, therefore, do not have the loyalty and obedience to listen to commands. It's dangerous to the community, children and other dogs.

I'm not usually one to get involved in things like this, as I imagine you have been bombarded with so many emails about it, and I'm sure you have more things worthwhile to be spending your time

on. However, after my recent experience I just wanted to ensure there was one more vote of support.

I agree with the proposal to introduce an offence of having more than four dogs in a public place.

I use Bromley parks (and indeed pavements) regularly and do feel that dogs can be intimidating. I would agree that being confronted by five or more large dogs under the control of one person is wrong and should not be allowed.

I do not object to the raising of the fine from £80 to £100.

I am writing to let you know that I am in favour of the new proposals to:

- introduce a new offence of being in charge of more than 4 dogs per person in a public place
- and increasing the fixed penalty from £80 to £100 for all offences.

Would like the number of dogs reduced to 3 (6)

In response to your letter attached, as a resident, dog walker and regular park user, I personally think that the wording should be "Being in charge of more than 3 dogs per person off lead in a public place".

I would have no problem with someone for example walking a Yorkshire terrier, a Chihuahua, a Maltese, a jack russell and a Pomeranian in a park if they were all on leads, but the additional offence would prohibit this.

On the other hand, I think someone cannot necessarily keep an eye on a Rottweiler, Siberian husky, a staffie and a Doberman pinscher off lead, but the additional offence would permit this.

Having seen a sign advising of your proposal to limit dog walkers to a maximum of 4 dogs per walk, I would like to wholeheartedly offer my support to this proposal.

I have 3 dogs myself, and walk the 2 smaller dogs separately to my larger dog because of the number of people walking large packs of dogs without a care in the world. My large dog is the most loving dog in the world, but having been attacked previously, he is terrified of everything, especially dogs running towards him, and he simply cannot cope with more than 3 dogs around him at a time.

I would therefore request that you lower that limit further to a maximum of 3 dogs at a time throughout the borough of Bromley, and I hope that Lewisham council might follow suit with the lower threshold, as they currently allow 4 dogs to be walked at a time.

As a daily dog walker at various public spaces in the Borough, including Keston and High Elms, I fully support the plan to restrict the number of dogs that one person is permitted to have under their control in public spaces. This is long overdue.

4 Dog limit

I regularly encounter large groups being walked - almost always by a dog walker rather than the owner. It is almost always the case that most of these dogs are off lead and at best loosely controlled.

While these 'packs' tend not to be aggressive dogs, they are exuberant and frequently intimidate walkers and other dogs by running around them, jumping up at them etc. The people walking them are in general unable to call them to order in time to prevent problems occurring with other walkers, dogs, children etc.

In addition to the lack of control that one person has over a large number of dogs, the problem of fouling is exacerbated as that person cannot possibly keep an eye on every dog at the same time, even if they were minded to pick/clean up dutifully (which many are not).

I do question whether the 4 dog limit is the right number. I do not think anyone can reasonably be in control of and adequately supervise that number of dogs. It would be better to set the limit at 3 or, alternatively, set the limit at 4 provided that no more than 2 of the 4 are off lead.

Fixed penalty level

I would support the increase in fixed penalty levels if the level of enforcement was also increased. It matters little what the level of the fine is if there are not enough resources to ensure that the rules are enforced.

Consultation process

I came across the notice about these proposals by chance while out at Keston. I do not think that they have been adequately publicised though. Searching the Bromley web site I cannot find any

reference to this consultation. You are likely to be vulnerable to procedural challenge (judicial review) if opponents to these plans are able to show that your consultation process has been inadequate.

I am Secretary of Hollydale Open Space, where many dogs are walked daily. On the whole walkers are very good at picking up after their dogs. We have a bag dispenser which is often used.

I agree that the fine should be increased and, more importantly I feel strongly about walkers with more than four dogs. I really think the upper limit should be three.

Our Park is very small, but in larger parks the problem would be greater.

I agree wholeheartedly with your additional bylaws. I feel however you should add to the paragraph about people picking up after their dogs have fouled that they dispose of it in a litter bin or take it home (and not hang it on trees and bushes as often happens!). Just picking up is not enough!

I also think that dog walkers should be allowed a maximum of three dogs and not four as it is difficult to keep an eye on where four dogs are fouling and some waste will get missed.

I have just seen the Notice about proposed additional rules and penalties for people walking several dogs in the park. The Notice is fixed to the upright holding the notice board outside the Information Centre – i.e. not very noticeable. It seems that I have missed the date for making comments but I would like to add my two penny worth just the same since it is something that has been concerning me.

I would fully support your proposals, in fact I would go further and suggest that a maximum of three dogs is sufficient for one person to properly control and clean up after.

Recently there have often been 3 or 4 groups of dog walkers with 8 or 10 dogs each in the park, meaning that there can be between 30 and 40 dogs milling about, plus the other individual dog owners with one or two dogs. It is quite intimidating and overwhelming even for me as a dog owner (of one Highland terrier) who is not afraid of dogs, as well as being off putting for a visitor just wanting to walk and enjoy the park. In addition to the packs of dogs - usually reasonably well behaved - some of the dog walkers shout incessantly to their dogs to come back or keep up, which is also irritating and a nuisance for others. I cannot imagine that even two dog walkers with 8 dogs can ensure that they clean up after all their dogs - which is also a nuisance and a hazard for people (and kids) playing football, or wanting to sit on the grass.

I'm afraid that the park, which seems to be more and more neglected in its upkeep together with the number of dogs, is becoming a less attractive asset to the borough even though at present it is still very well used by locals. Time to stop the rot!

Disagree with proposal (90)

Kennel Club response to London Borough of Bromley Public Spaces Protection Order consultation Submitted on 13 December 2019 by: The Kennel Club, Clarges Street, Piccadilly, London W1J 8AB, tel: 020 7518 1042, email: kcdog@thekennelclub.org.uk

The Kennel Club is the largest organisation in the UK devoted to dog health, welfare and training, whose main objective is to ensure that dogs live healthy, happy lives with responsible owners. As part of its External Affairs activities, the Kennel Club runs KC Dog, which was established to monitor and keep dog owners up to date about dog related issues, including Public Spaces Protection Orders (PSPOs) being introduced across the country.

As a general principle, we would like to highlight the importance for all PSPOs to be necessary and proportionate responses to problems caused by dogs and irresponsible owners. It is also important that authorities balance the interests of dog owners with the interests of other access users.

Maximum number of dogs a person can walk

The Kennel Club feel that an arbitrary maximum number of dogs a person can walk is an inappropriate approach to dog control that will often simply displace and intensify problems in other areas. The maximum number of dogs a person can walk in a controlled manner depends on a number of factors relating to the dog walker, the dogs being walked, whether leads are used and the location where the walking is taking place.

An arbitrary maximum number can also legitimise and encourage people to walk dogs up to the specified limit, even if at a given time or circumstance, they cannot control that number of dogs. We thus suggest that defined outcomes are used instead to influence people walking one or more dogs, be that domestically or commercially, such as dogs always being under control, or not running up to people uninvited, on lead in certain areas etc.

For example, an experienced dog walker may be able to keep a large number of dogs under control during a walk, whereas an inexperienced private dog owner may struggle to keep a single dog under control. Equally the size and training of the dogs are key factors; this is why an arbitrary maximum number is inappropriate. The Kennel Club would recommend the local authority instead uses the proposed “dogs on lead by direction” orders and targeted measures such as Acceptable Behaviour Contracts and Community Protection Orders to address people who don’t have control of the dogs they are walking.

A further limitation of a maximum number of dogs per person is that that it does not stop people with multiple dogs walking together at a given time, while not exceeding the maximum number of dogs per person. Limits can also encourage some commercial dog walkers to leave excess dogs in their vehicles, which can give rise to welfare concerns.

We also note that commercial dog walking insurance is readily available; many policies are available which cost in the region of £100-150 per year will allow commercial dog walkers to walk six dogs off lead. While individual policy coverage may vary, these policies would typically cover financial claims arising as a result of commercial dog walking i.e. dogs attacking other dogs, or people, or getting lost. The widespread availability of insurance for walking six dogs off lead, and relatively low cost premiums is an indicator that commercial dog walking exceptionally rarely results in serious incidents, such as attacks on people or other animals. While we acknowledge reports of

uncontrolled groups of dogs being walked by one person have been made to the council, we would suggest that either an accreditation scheme is adopted or targeted measures such as Community Protection Orders are used against the individuals who are causing the problem. Accreditation schemes can be far more effective than numerical limits, as they can promote wanted good practice, rather than just curb the excesses of just one aspect of dog walking. Accreditation can also ensure dog walkers are properly insured and act as advocates for good behaviour by other dog owners.

Dog access

The Kennel Club oppose PSPOs which introduce blanket restrictions on dog walkers accessing public open spaces without specific and reasonable justification. Dog owners are required to provide their dogs with appropriate daily exercise, including “regular opportunities to walk and run”, which in most cases will be off lead while still under control.

Accordingly, the underlying principle we seek to see applied is that dog controls should be the least restrictive to achieve a given defined and measurable outcome; this is the approach used by Natural England. In many cases, a seasonal and/or time of day restriction will be effective and the least restrictive approach, rather than a blanket year-round restriction. For instance, a “dogs on lead” order for a picnic area is unlikely to be necessary in mid-winter.

The Government provided clear instructions to local authorities that they must provide restriction free sites for dog walkers to exercise their dogs. This message was contained in the guidance document for Dog Control Orders, and has been retained in both the Defra/Welsh Government and Home Office PSPO guidance documents, with the Defra guidance for PSPOs stating ‘local authorities should ensure there are suitable alternatives for dogs to be exercised without restrictions’.

Dogs on lead by direction

The Kennel Club welcomes ‘dogs on lead by direction’ orders, as these allow responsible dog owners to exercise their dogs off lead without restriction providing their dogs are under control, whilst allowing the local authority powers to restrict dogs not under control. We would also recommend local authorities make use of the other more flexible and targeted measures at their disposal such as Acceptable Behavioural Contracts and Community Protection Notices. Kennel Club Good Citizen Training Clubs and our accredited trainers can also help those people whose dogs run out of control due to them not having the ability to train a good recall.

Dog fouling

The Kennel Club strongly promotes responsible dog ownership, and believes that dog owners should always pick up after their dogs wherever they are, including fields and woods in the wider countryside, and especially where farm animals graze to reduce the risk of passing Neospora and Sarcocystosis to cattle and sheep respectively.

We would like to take this opportunity to encourage the local authority to employ proactive measures to help promote responsible dog ownership throughout the local area in addition to introducing Orders in this respect.

These proactive measures can include: increasing the number of bins available for dog owners to

use; communicating to local dog owners that bagged dog poo can be disposed of in normal litter bins; running responsible ownership and training events; or using poster campaigns to encourage dog owners to pick up after their dog.

Assistance dogs

When introducing a dog control PSPO local authorities should consider the potential negative impacts on vulnerable groups and their requirements under the Equality Act 2010. The most obvious potential adverse impact is upon those who rely on assistance dogs and blind people, who may either be unable to comply with conditions contained within the Order, or the effect of the Order would be to exclude them from accessing public spaces. Appropriate exemptions from dog fouling and dog exclusion Orders should be included in PSPOs, for blind people and those who rely on assistance dogs. Though the council should recognise that many disabled people enjoy the company of a pet dog (i.e. not acting as an assistance dog) and this also needs to be considered.

Assistance Dogs UK currently have eight member organisations which can be viewed here - <http://www.assistedogs.org.uk/>. However, the membership of Assistance Dogs UK is not a definitive list of all UK assistance dog organisations, and may change during the currency of the PSPO, it also does not provide for owner trained assistance dogs. We would therefore encourage the Council to allow some flexibility when considering whether a disabled person's dog is acting as an assistance dog.

We would encourage the Council to adopt the definitions of assistance dogs as used by Northumberland Country Council which can be found on page 2 of the attached document;
“(4) The term “Assistance Dog” shall mean a dog which has been trained to assist a person with a disability.
(5) The expression “disability” shall have the meaning prescribed in section 6 of the Equality Act 2010 or as may be defined in any subsequent amendment or re-enactment of that legislation”.

I write to you regarding your recent consultation on the proposed changes to the number of dogs allowed on dog walks at one time. Whilst I understand the case for addressing walkers who are unable to control their dogs in the park, I do not agree that imposing changes to the number of dogs per walker is in the interest of the community. As a dog owner myself, I see a number of dog walkers on a daily basis who are able to effectively control their dogs. I know a lot of the walkers are dependent on their dog walking business, and as a supporter for local businesses, oppose any changes that may harm their businesses. Instead I would support an increase in penalties for those who fail to control their dogs or to pick up their waste.

I am writing to strongly oppose the introduction of a restriction to 4 dogs per person walked in a public place.

This rule would adversely affect the income of responsible, reliable dog walkers such as my own who rely on being able to walk up to 6 dogs for their income. As a knock on affect this would make a real impact on lots of working people and elderly infirm people in the borough who rely on dog walkers to enable them to keep a much loved pet.

My dog walker has been in business for years, shows and trains her own extremely well behaved dogs, often walks very small dogs on leads along with a couple off lead - never over 6 as her insurance covers her for 6.

She has never had any altercations caused by dogs on her walk nor allowed her dogs to roam and

annoy or scare people and has them under control at all times.

This new rule and fine will mean that she may not be able to continue to run her business.

I totally accept that there are some unscrupulous walkers who do not have this level of control and safety, but it is very unfair to bring in this blanket ban and fine system to all the good responsible walkers & ruin their businesses for the sake of a very few people.

Can a dog walkers' licence not be issued that has a stipulation that a new walker cannot be in charge of more than 4 dogs until they have been in business for 3 years? Then no more than 6 maximum.

There will always be small scale walkers who never go over 4 dogs but for the wonderful walkers who can safely control up to 6 dogs this would be far fairer.

Please consider this proposal. Surely it would be more cost effective for the local authority rather than patrol areas and issue and administrate fines. Plus would reassure the public that a robust system is in place.

My dog walker has been walking my dogs for over 8 years and is exemplary in her behaviour and also in the way she controls the dogs in her care. She is insured in line with DEFRA to walk 6 dogs and also has a license from Bromley council to walk 6 dogs. She always makes sure she follows the law and has the relevant insurances needed. However it has been brought to her attention via another dog walker who saw a notice on a tree that the council is limiting dog walking to just 4 dogs. This would put my dog walker out of business and she is sick with worry (as are all the owners of the dogs). My dog walker is such an honest, hardworking, law abiding citizen it just seems so unfair.

I am writing in protest and hope you will think deeply about the serious implications of your actions on local people.

I have just heard that Bromley Council are planning to restrict professional dog walkers from walking more than 4 dogs at a time.

Although I have no vested interest I do know that dog walkers provide a critical service not only to professional people who are out at work all day, but also for elderly people whose only company is their dog.

By reducing the number of dogs to only 4 per session the walkers will, without a doubt be forced to raise their prices to the clients they will have remaining, and in the case of the elderly on a fixed income pension, you will most likely put the service beyond their abilities to continue to pay for the service.

Rather than penalise the many excellent walkers who abide by all the rules, apply for new licenses when the Council decide to issue them, have their premises inspected by the appropriate government bodies etc. etc., why not focus on the cowboy walkers? The ones who far exceed the maximum dogs allowed at any one time, who allow the dogs to run out of control, who never dream of clearing up any mess that has fouled the parks?

My elderly friend uses a top quality dog walker. She walks 6 dogs at each session. She trains all the dogs to recall before allowing them off the lead and she regularly posts on Facebook what her charges have been up to.

She will even take a sick dog to the vet if need be and she will provide care if the owner goes into

hospital which happened to my friend when she broke her ankle and needed respite.

She has been inspected by DEFRA, the RSPCA, a City of London vet who issued a 5* boarding licence and she is totally committed to giving a gold star service.

Another knock on effect will be a reduction in adoptions from animal rescues like FOAL Farm and Last Chance Animal Rescue because the walkers will have to raise their hourly charges to cover the reduction in numbers.

It all seems so grossly unfair to strike a blow at these people and I really suggest you should rethink through all the implications of this idea. We need more dog walkers, not less, at an affordable price.

I'm emailing as I'm incredibly concerned about the new proposal to ban walking more than 4 dogs at any time.

So many people, like myself, work full-time and are therefore unable to care for their pets in the day. We rely on our dog walkers to ensure our dogs get the exercise and socialisation they need to nurture their wellbeing.

Our rescue dog Dougie is walked by an incredible dog walker, who walks 4-6 dogs at a time and already has an immensely busy daily schedule. I've never known someone to maintain such control of an animal, and in response I've never seen Dougie behave more obediently.

I totally appreciate that not all dog owners or walkers are in control of their animal, but I desperately urge you to reconsider this restriction, because not everyone should have to suffer for the irresponsibility of a minority.

Wouldn't it be possible for those dog walkers who've never had any incidents or complaints against them to be allowed to continue to do their jobs? This ban may seem like a minor issue to some, but it has the likely potential to destroy livelihoods.

As a working dog owner I rely heavily on the services of my dog walker and they are invaluable to me – I vet my dog walker as I would a child minder and have been lucky enough to find someone who is more than capable of looking after 6 dogs – having each under control and totally responsible and professional, so much so I have used her for 11 years - but I have heard about the above proposal and strongly disagree with this on the following grounds:

Insurance covers dog walkers to walk 6 dogs at a time
DEFRA guidelines favour 6 as the upper limit
The RSPCA and The Dogs Trust guidance for dog walkers is also a 6 dog limit

So I would ask why Bromley thinks these organisations are wrong and are proposing to only allow 4? I would also be interested to know if Bromley Council engaged with stakeholders about this as there is no reference to this and would also question if anyone actually knows anything about business models or how responsible dog service providers operate? .

I agree that there has to be some sort of control so why not introduce something like a driving licence with points and to get this licence they have to have insurance and if they break the rules they are fined and points on their licence?

I am writing you about the proposed 4-dog limit for dog walkers in Bromley. As someone who relies on dog daycare for my dog with special needs, I strongly oppose this proposal. It took us months to find a dog walker who was suitable for our dog. Our dog walker has been a godsend for us, and our

dog – who is a rescue and had an abusive puppyhood – has grown to love not only the dog walker but the “pack” she is now part of. My dog walker is incredibly experienced and has full control of all the dogs in her care. She is very selective about the dogs she takes on and requires a trial period to ensure that any new dogs fit in the group.

If this limit were passed, my dog walker would have to reduce the number of clients she has, and as this is her livelihood, she would also have to raise her prices. At best, this would mean that we would have to pay more. At worst, we would have to find another dog walker, which would be incredibly challenging with our dog’s special needs.

I know I am just one person, but I hope you will take my experience into consideration. This proposal penalizes qualified, experienced dog walkers, as well as their clients. According to the Kennel Club, who also oppose dog walking limits, a better approach would be targeted measures such as Acceptable Behaviour Contracts and Community Protection Notices to address people who don’t have control over the dogs they are walking: <https://www.thekennelclub.org.uk/media/1159277/kc-dog-briefing-maximum-numbers-of-dogs.pdf>

I write regarding the proposal to limit the number of dogs a dog walker may have. Surely no-one is thoughtless enough to believe it is worse to have a person walking six under-control dogs than one person with an out-of-control dog? We wouldn't say that a parent with five children is less likely to look after them than a parent who has only one, would we? Even my four year old said that he didn't think anyone could make such an error. It is unfair to ruin people's businesses. Even those who do not like dogs do not want someone who is earning and paying tax towards the NHS and schools to have to stop-why should someone be forced to stop supporting themselves and others, and perhaps be forced to take benefits instead, when they'd rather run a business? Some of the dogs might belong to carers/teachers/nurses/doctors-and they might not be able to work if their dog -walker cannot look after their dog any more. Some people with disabilities might not be able to keep their dog if the person who normally walks him can't do anymore because they are prevented from walking more than four at once. This is very unfair on people who find their disability limits their life choices-please make sure that such a law, which would discriminate against people with disabilities, does not come to pass. Whether or not we like dogs-and I do think that certain dog-owners might be a problem, for their own pets as much as for other people-we should not discriminate against decent people because of a small minority, any more than we should stop parents taking their children to public places just because some parents do not look after their offspring as they should.

I am writing this email in opposition to the council’s recent proposal that being in charge of more than four dogs per person in public spaces will incur a fine; therefore please accept it in support of the professional dog walkers and carers who operate safely and effectively in Bromley.

I and many people I know rely on a professional dog walker on a daily basis, who runs a legitimate business based on caring for no more than six dogs at once. As a single person, I would not be able to go to work and earn a living myself without their services which may cease to operate if this proposal comes into effect. I would be seriously negatively affected by the council's proposal and therefore vehemently oppose it.

Amending the proposal to six dogs instead of four, however, would better support our dog caring community and help prevent non-professionals from operating unsafe practices. I am happy to be consulted further on this matter, and to publicly represent my point of view where required.

I understand there is a proposal to let people walk only 4dogs at a time, I use a dog walker/dog daycare for my dog, their service is essential to me & my partner (emergency services) they also have complete control over the dogs they walk.

Enforcing dog walkers/borders to have a licence that they wear as an armband (like doormen) would

be better maybe?

I'm uncertain why there is a proposed additional offence bringing the walking ratio of 6 dogs to 4.

I only have 1 dog but he is looked after by my dog sitter who is incredibly conscientious, often picking up other dog poo as well as the dogs she looks after. She has excellent control of the dogs in her care, ensuring she only takes on well behaved dogs.

This will seriously affect her business. It is disappointing that your agenda to deal with irresponsible dog walkers/ owners will impact those who are very responsible. Those with 4 dogs who are irresponsible will continue to be so but those with businesses who rely on walking up to 6 dogs will be detrimental impacted.

There must be other ways to deal with those that are irresponsible.

I wanted to write to you to oppose the proposed 4-dog limit that Bromley council is considering. An arbitrary limit like this doesn't work in practice: 1 badly-behaved dog can cause far more damage than 6 well-behaved dogs. This proposed restriction has the potential to penalize responsible owners and walkers.

As an alternative, I would suggest the Kennel Club's recommendation of Acceptable Behaviour Contracts and Community Protection Notices, as seen in this document:
<https://www.thekennelclub.org.uk/media/1159277/kc-dog-briefing-maximum-numbers-of-dogs.pdf>

Just a quick email to reinforce others you have probably seen due to the notice to limit group dog walks to a maximum of 4 walks.

Although I completely understand the reasons, I believe the limit should be 6 in accordance with guidelines from other groups

- DEFRA
- RSPCA
- Dog's Trust
- Dog Care licensing

As a person who regularly uses dog care, my worry is that if licensed dog walkers are obligated to drop their numbers from 6 to 4 dogs then the cost of dog care would have to greatly increase and it's already extremely expensive.

In addition, licensed dog walkers have an obligation to maintain control of the dogs in their care or risk their licence so penalising them would seem harsh, and not fixing the route of the problem which is unlicensed dog walkers/carers.

I am a retired pet sitter and, whilst I no longer walk dogs (except my own), I should like to comment on the above consultation.

Most professional dog walkers all have business insurance, which allows them to walk a maximum of 6 dogs. Surely if insurance companies are happy with 6, then the council could be too?

The number of dogs is actually irrelevant. Many owners own one or two dogs and these can be just as uncontrollable. They rush up to strange dogs and people and cause mayhem. How can you legislate against that? Training is key here and most professionals know exactly what their clients' dogs are doing.

The Kennel Club is against arbitrary limits of numbers and DEFRA recommends 6.
<https://www.thekennelclub.org.uk/media/1159277/kc-dog-briefing-maximum-numbers-of-dogs.pdf>

In conclusion, I think 4 dogs is prohibitive and will penalise those dog walkers working hard to run a professional business. 6 is a far more acceptable number. The results of reducing the numbers will mean some dogs will be left home alone all day, and less professional walkers will increase.

I look forward to hearing the results of this consultation.

Just wanted to register my concern and disagreement with this proposal.

My dog Max is looked after by a dog walker. Her business is registered with the council and was recently reassessed and rated with top marks by your assessors. My dog goes to her for day care/a walk and boarding as required. It is his second home. She walks 6 dogs without any problems. She carefully picks the dogs she cares for and they all have to pass an interview walk with her and her own dogs to make sure they will fit in with existing dogs and have the required level of recall skills and behaviour. Please check out the posts on her Facebook page where you will see how in control of our dogs she is.

If you restrict the number of dogs she can walk you are likely to make her business uneconomical and unviable. If she has to reduce the number of dogs she cares for and/or she has to increase her fees this will have a big impact on me. I am a widow and I live alone and work 3 days a week. My dog is very nervous but loves being with her and her charges. I cannot even think about trying to find another carer for him.

It seems illogical to me that you allow her to care for 6 dogs plus her own 2 but now want to restrict the number she can walk to 4. My understanding is that her insurance company, the RSPCA and the Dogs Trust all say that 6 is an acceptable number for a professional dog walker. Why do Bromley Council think they know better?

I know there are other unprofessional dog walkers who walk many dogs. I have seen them myself. They stand chatting in the middle of the park and leave their dogs running around. HOWEVER you should not be punishing registered, licensed professionals as well as these people. You need to not make the reduction to 4 dogs or find a way for licensed professionals to carry on as they are whilst punishing those who choose to behave badly.

Concerning the above, please could you confirm how many complaints the Council has received about dogs being out of control when walked in groups of more than 4 dogs? Please also confirm what issues have arisen from the same, and whether any have resulted in harm to people or other animals?

I ask as someone who has walked daily in most of Bromley's parks for the past 30 years, and cannot recall a single incident. I own 2 dogs and don't ever walk with 4 dogs, but am concerned that dog walkers are being unfairly targeted.

If dogs are out of control, in my own experience it is usually individuals with just 1 dog they are either unable or unwilling to control. However, most dog owners and walkers are very responsible. If there is no justifiable reason to impose further sanctions on dog owners then I oppose the proposal to restrict the number of dogs to 4 per person in public places.

I also oppose an increase in the penalty for all dog related offences from £80 to £100. These charges are disproportionate to the offences named.

Two days before Christmas I was alerted to a letter pinned to a tree at Well Wood where I walk my dogs, headed "Consultation re Proposed Additional Offence in Relation to Control of Dogs"

I am a local business owner/operator. I have been operating a dog care (Daycare, boarding and walks) from my home in Bromley for nearly 10 years. I am Council Licensed with it being renewed last year under the new rating system, with a 5 star 3 year licence.

I apologise for the lengthy email but there's a lot to cover and a lot of information that I am keen to share with you.

Whilst I fully agree with the proposals in your letter, the final proposal "Being in charge of more than 4 dogs per person in a public place" would have serious implications for my business and the service my clients rely on. It will cause problems for every dog care business in our borough, and any dog owner who relies on the essential service we provide.

Bromley Council hasn't previously set a limit to the number of dogs one person can walk. I am alarmed and concerned that this proposal, if brought in will have a seriously detrimental effect on the business I have worked so hard to establish. My daily business is modelled on 2-3 walks of up to 6 dogs (sometimes fewer but never more than 6). In real terms, having to reduce my walks to 4 dogs would reduce my customer base by 1/3, reducing my earnings from an hour's walk from £81 to £54. I do not earn a fortune and work extremely hard for my income. Reducing my income by a third would mean I would not be able to invest in a van to replace my existing vehicle which is now unreliable and not cost-effective. I had been researching an electric vehicle purchase in 2020 as an environmentally-friendly alternative, but if this proposal comes in, it would be impossible for me to finance.

My clients are not wealthy people; the dog care I provide is not a luxury. It is as essential to them as daycare is for working people with children. I have clients who work for the NHS, single parents, and teachers, plus some elderly people who without me would find it almost impossible to keep their only companion as they can't walk their dog themselves.

I personally assess every dog I take on. I am very selective about which dogs join my walks and never take on dogs with behavioural issues such as aggression. I cannot see how any of my group dog walks are a threat to the public or walking 6 dogs or 4 would make any difference. The only outcome would be a severely reduced income and that I could no longer provide the ongoing service my customers need - many of whom have been with me for years. I have even mentored dog walkers starting up so they can learn from my experience.

I am a small business that operates as a sole trader. I pay my taxes and because I am self-employed, I have a healthy work/life balance and don't impact much on services such as the NHS (I pay for my own private medical cover instead). I also don't take up a daily space on public transport on a daily commute (which I used to do before I started my business).

Can you explain why the number of dogs has been set to 4? You may be unaware that in October 2019, new licensing laws for dog daycare were brought in by DEFRA. Their guidelines state that 6 is a permissible number to walk as a group. My business insurance (provided by Cliverton who are a dog-walker specific specialist) covers me for third party liability for up to 6 dogs. In addition, I have held a license with Bromley Council for 7 years, to board up to 6 dogs. I was also granted a licence to provide daycare for up to 6 dogs in addition to my own 2 (total 8 dogs), on 1st January 2019 for three years.

DEFRA "The Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018 Guidance notes for conditions for providing home boarding for dogs November 2018" (DEFRA) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/762467/animal-welfare-licensing-home-boarding-for-dogs-guidance.pdf

Guidance states: No more than 6 dogs per person can be walked at one time and owner's consent is

needed to walk with other dogs.

As the DEFRA legislation states dogs are not permitted to be left alone, then I have to walk the 6 dogs in my care together. Can you see the problem here? Has the Council's licensing department been consulted about the proposal? Which stakeholders have been involved in this proposal? To date I can still not see the consultation proposal on Bromley Council's website. Don't such proposals need to be in the public domain? Hardly anyone in the community of dog walkers that I know personally has heard about the consultation!

The Dogs Trust (working with Pet Industry Federation (PIF) and RSPCA) published a guide for professional dog walkers last year. It states: The maximum number of dogs that can be walked at any one time should not exceed the number stated in the walker's insurance policy and comply with local authority requirements regarding the number of dogs.

Any professional walker I know works to a high level of competency and is experienced in handling groups of up to 6 dogs. We largely follow the guidance outlined by the Dogs Trust and are responsible, experienced professionals.

www.dogstrust.org.uk/news-events/news/2019/animal-groups-join-forces-to-launch-guidelines-for-professional-dog-walkers

There is a very bad feeling amongst the dog walking community, that where we would expect support for our small businesses which provide valuable services to the public, that we are being ostracised and dictated to by a council who have little empathy or understanding as to how our businesses operate.

I am fortunate that I can offer daycare and boarding, but other contemporaries of mine who only offer dog walks are questioning whether they will be forced to close their businesses if this new ruling comes in to place. They have monthly outgoings like all of us and being self-employed can be a struggle, with no sick pay or holiday pay. Had you thought how this proposal will affect people's livelihoods in the borough?

I can understand if this proposal is a reaction to the many dog walkers who are unregulated and walk more than 6 dogs at a time. Some of whom travel from outside our borough because their own Councils have already imposed restrictive numbers of 4 dogs per group. I witness these people almost daily, and take pains to avoid their unruly groups as they are a threat to my calm, controlled walks.

I fear that your proposal will target the responsible and professional walkers who already abide by rules. It will not have any effect on the rogue walkers who will continue to take no notice and are probably also uninsured. It is those people who pose a threat to the public and the dogs in their care. Owners employing their services may well be unaware of the poor service they are getting. I have two dogs in my care who came to me having previously been let down by an incompetent walker.

I'd be very happy to liaise further with you if you would like a professional, experienced input on legislation affecting dog walkers. Have you for instance considered licensing professional dog walkers? It might not be an immediate problem-solver but it would perhaps reassure the public that our industry is sufficiently regulated. Perhaps that could be an alternative?

I implore you to look again at setting the limit of numbers of dogs that can be walked. Could you not reconsider changing the limit to 6? It would make the world of difference - especially to a friend of mine who personally owns 5 dogs and is extremely stressed by the new proposal.

Alternatively, as I am already licensed by Bromley Council to have 6 dogs plus my own 2 - total of 8, in my care. I have been inspected and assessed in great detail, would I be except from the new proposal?

There is a high demand for proficient dog walkers in our borough. There is already a shortage of licensed dog daycare places (many businesses are still operating without licenses as a quick search on Facebook for example, might demonstrate); yet more restrictions will put people off running their own legitimate businesses.

Don't you think it's a pity that we can't treat dog care professionals with more respect - providing valued services to their communities, as they do in the USA?

I look forward to hearing your comments and do please get in touch if I can be of further input.

I have seen the notice posted in my local park (Well Wood) about the intended restriction on the number of dogs that can be walked by one person.

I do agree that in the past year or so there has been a problem in some parks where commercial dog walkers have been exercising many dogs and they may not have been under proper control. I have seen it in my local parks in West Wickham and Biggin Hill where these commercial/professional dog walkers have quite a few dogs with them off the lead, and this does appear to be intimidating to some people.

However, as a dog owner and trainer myself, I feel I need to make a couple of points. I own five dogs. I am a Kennel Club Accredited Dog Trainer under their KCAI Scheme, I run the local dog training club in Coney Hall (The Gypton Dog School), I am also Chief Instructor at a KC Registered Dog Training Club in Orpington (St.Edwards DTC), and I am a volunteer Assistance Dog Trainer with the charity Dog A.I.D. I compete in dog obedience as a sport, and have done for over forty years. These are the main reasons that I have more than one dog. Three of my dogs do competitive obedience (one is retired now but in his day he competed in obedience at the highest level including at Crufts). My small breed dog does trick training and is my demo dog in training classes, and the other is a show/pet dog.

I do feel very strongly that the new regulation should only apply to the commercial dog walkers. My husband and I are not always available to walk our dogs together, so there are occasions when only one of us takes the five dogs out to the park. Under this intended new system we could be fined for walking our own dogs, who are all under our control as they live with us 24/7 - unlike the commercial dog walkers who only see the dogs they are out with for an hour a day.

The other point I wanted to raise is that some years ago I enquired of the Council if it was possible for me to use the park for occasional dog club sessions at my own dog club - such as recall training in a real situation for example. I was informed that it's against the regulations to use parks for any activity where people have paid to take part, i.e. they have paid me for the session. Surely this must cover the commercial dog walkers too? They are earning a living by using free venues, are sometimes causing a nuisance, and vastly increasing the amount of dog waste in one place. Even if they clear up after the dogs in their charge, it does mean the dog poo bins are almost always full.

Can you please let me know if restricting the new rules to commercial/professional dog walkers only is something that the Council would consider? I feel that would be the fairest way to implement it. After all, there are very few other people like myself who own more than four dogs - in fact I have never met anyone else in forty odd years of dog walking in local parks who owned five or more dogs!!!

It has been brought to my attention that Bromley Council wish to allow people to walk only four dogs at a time. Whilst I can see the point of view of local farmers etc. this would seriously affect many of the conscientious dog walkers in the local area who have full control of the dogs they walk and carefully plan the dogs they walk with each other.

A solution to the problem might be to licence the dog walkers instead which would stop just any one setting themselves up as a dog walker and walking a large number of dogs with no experience and as part of this they would have to have their own insurance policy.

I do not see why some dog walkers should be penalised for the few dog walkers and people that walk large groups of dogs without control.

It has come to my attention that Bromley propose an additional offence in relation to control of dogs. I have read the proposal and I am in disagreement with this proposal.

I have a wonderful dog walker that is incredibly responsible and is insured and looks after our dog so amazingly.

This proposed new offence would impact so horribly on her ability to make a living. She only takes 6 dogs at a time and is incredible at controlling all the dogs.

I do understand that there are a lot of irresponsible dog walkers out there that have too many dogs and do not know how to control them but I propose maybe a license for dog walkers and that way allowing them to walk more than four dogs responsibly.

I am convinced that the unscrupulous dog walkers would then be forced to take better care and not walk too many dogs.

I had researched my dog walker very well before I chose her (which is what everybody should do) and in the three years that I have used her she has never disappointed. I would hate to lose her because she can't make a living with fewer dogs. Please consider this before something is implemented.

She would be totally willing to get a license. I'm sure this is a better idea than enforcing this proposal. Not sure anyway how you would go about doing so. It would mean officers out there to enforce it in all public parks and other places. I'm fairly sure enforcing a license would require less feet on the ground.

Thank you for reading this and hope you can be understanding about the issue.

I am a resident of Bromley and it has been brought to my attention that there has been a proposal to implement a rule in respect of commercial dog walking group sizes.

It is always reassuring to see the council taking an interest in this business area, which is sadly abused by some individuals who do not pick up after the dogs they walk, spend their whole time on the phone whilst walking and seem to demonstrate little care towards those dogs entrusted with them.

Finding a good business to entrust a much loved member of the family with is hard, and indeed it is tricky to differentiate the cowboys from the hard working professionals. However in order for these professionals to thrive and set the right example they need to be able to run a profitable business. I for one have no problem with my dog being walked in a group of 6 because the business I use operates with the highest standards and professionalism.

This therefore begs the question- what does a policy of 4 dogs at a time aim to achieve, when it clearly will not solve the issue at hand and will penalize good honest businesses?

I for one feel this is quite a lazy suggestion to solve an issue which would be best addressed with some kind of standards agency or vetting process, should this be a concern of the council. I urge you to consider other approaches to assist with the issue, as penalizing existing businesses will just create a higher demand for the service and henceforth more "cowboys" looking to make some quick cash.

Having excellent care for my dog is of upmost important to me and therefore I am happy to be part of this discussion, should you require any residents and service users to consult with.

I have seen this notice around and about and having thought about it wanted to send you my objections.

I have a dog so use dog walkers and whilst I would agree that there are some dogs walkers that don't behave correctly the ones that I use always do. Their insurance allows for 6 dogs and they are always conscious of health and safety when out. I have observed them many a time from afar and they are always in control of their dogs. Bearing in mind that this is can be someone's sole business it feels a bit harsh. I have also seen dog walkers that don't pick up the dog poo or don't look like they are in control, but I don't think having only four dogs will make a difference to this and it is only a handful of dog walkers that are like this. Wouldn't it be better to have dog walkers apply for a license from Bromley that they have to have visible whilst working. That way if they are not behaving in the right way they can be reported straight away. I hate seeing the odd few bad dog walkers giving the good ones a bad name and it feels wrong to tarnish them all with the same brush.

I wanted to express my opposition to the proposal to implement the above rule. I would actually welcome dog walking being a licensed activity if it removed some of the sub-standard walkers I see almost daily, who often walk for more than 6 at a time, fail to pick up dog waste, and clearly have little understanding of dog behaviour or responsibility that comes with having other people's dogs in their care.

Please therefore consider how essential my dog walker is to us and our dog, and that for a trained professional it is perfectly possible to walk 6 dogs under control without causing any risk.

I am writing in response to your consultation letter dated 10.12.19, specifically regarding being in charge of more than four dogs in a public place. To be clear and direct, I do not agree with this proposal.

Can I request the objective in this proposal? This isn't stated on the letter – have seen a hard copy strapped to a tree locally but can't easily access it on the Bromley website, any links or further rationale would be appreciated.

My wife and I use the services of a professional dog walker on a daily basis, who is insured for walking up to six dogs. It is also my understanding that DEFRA advise that up to six dogs can be walked at once*, plus the RPSCA and Dogs Trust concur.

*https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/221091/pb11577g-dogcontrol-orders.pdf (page 13)

Rather than reduce numbers of dogs under supervision of one individual, in our view it would be better practice to make dog walking a licensed activity. This would ensure the individual in charge should act in the most responsible manner. Whilst it requires more administration it would surely be a more effective way of regulating the quality of dog supervision in the borough. Especially in

light of the specialist guidance stated above. Again, it would be good to know what research and conclusions Bromley Council has adopted ahead of making this proposal? I do not count local park users and residents in this category, for obvious reasons - their views are subjective and not necessarily professional. Additionally, who are the "key stakeholders" referenced in this proposal? I would appreciate the opportunity to liaise with them directly please.

In our case, reducing the number of dogs our walker can take at a time (from six to four) would mean we would be unable to use his services and create us problems with our working commitments. I can imagine we would not be alone in this scenario. Furthermore, it would negatively affect business models of most professional dog walkers which would affect more dog owners in the borough. Have any professional dog walkers been consulted ahead of this proposal? We have every confidence in the professionalism of our long-term dog walker who himself would welcome better regulation & administration to address concerns, including licensing local dog walkers. Reducing the number of dogs to four isn't necessarily going to resolve current concerns, depending on what they are – again more detail is required to understand what these are.

If you can come back to me on the specific requests please, namely:

- What is the objective of the four-dog proposal?
- What is the rationale behind the proposal (detail and specific concerns Bromley Council are looking to address)?
- What professional and specialist research/groups have been consulted ahead of this proposal?
- Have any professional dog walkers in the borough been consulted ahead of the proposal?
- What is the council's position on licensing dog walkers?
- Who are the key stakeholders referenced in the proposal?

I have been passed your letter to stakeholders on the above proposal and as a Bromley resident who uses a dog walking service provider I am writing to object to the limitation to 4 on the number of dogs that an individual may be in charge of.

I regularly use an individual to take care of my dog during the day. He walks up to 6 at any one time. He is insured and is an excellent example of responsible dog walking and care. He knows all his charges, cares about them and manages them properly at all times. His ability to earn a living would be curtailed if you introduce this new limit.

What is the object of such a limit? Insurers, DEFRA guidelines, the RSPCA and the Dog Trust all give guidance that 6 is a good number. Bromley is being inconsistent and introducing an arbitrary limit which will have no effect on irresponsible dog care - which is presumably your aim.

My dog day care provider has written:

"I would actually welcome dog walkers being a licensed activity if it removed some of the sub-standard walkers I see almost daily, who often walk for more than 6 at a time, fail to pick up dog waste, and clearly have little understanding of dog behaviour or responsibility that comes with having other people's dogs in their care.

This sledgehammer to crack a nut approach will not deal with the problem; instead it will affect decent, responsible professionals like me who have extremely high standards and a responsible approach, not just as a cash-in-hand hobby job.

I personally know some walkers who only do dog walks and would struggle to make ends meet if they had to reduce their client base, having worked extremely hard to build up a business to be viable."

I very much hope that you will reconsider the limit and raise it to 6 in line with the bodies mentioned above and dog day care insurers. Also, consider introducing a proper scheme which helps not

hinders responsible dog day care cover. These providers give a good and properly insured service for people who work all day but need their dogs walked and any measures which reduce the numbers of these providers risk dog owners taking short cuts and perhaps leaving their animals with uninsured providers or worse still, on their own all day.

I would like to strongly object to the proposal of restricting the number of dogs a dog walker can walk to 4. Our dog walker, runs a very professional service and I guarantee that she has control over all of her charges at all times during her walks. Restricting the numbers will make her business less viable which will lead to her having to raise her charges to her customers. She doesn't only walk dogs of full time workers but people who are unable due to health or disability to walk their companions so this will severely affect them financially.

I would like to know how you will go about enforcing this change i.e. how many people will be patrolling the parks at any one time? I am sure this proposal will not stop the unlicensed/uninsured dog walkers who will just carry on, risking the fine.

The only problem I have encountered during walking my own dog is with other dog owners who have no control of their aggressive dogs not with dog walkers.

I hope that my opinion will be taken into consideration.

I write this email to you in the hope that you reconsider your position on dog walks over 4 dogs, my friend has her own Dog walking business, she is what I and most people consider to be a professional Dog walker and carer for dogs. If you go ahead with your proposal of these new rules it could possibly ruin her business as she will either have to employ a helper, which she can't afford to do or let clients go, to accommodate the new proposed regulations.

Maybe Bromley Council could consider a registration system for professional dog walkers so they are not punished because of irresponsible dog owners, if you regulate a registration system properly making sure that the professional walkers have public liability insurance etc., it could be successful and give the council the chance to build up a network of people who could actually help Bromley Borough to be better.

I am a small business owner myself and i know how a potential change in rules can damage successful small businesses who provide a great service in the community.

Please reconsider or maybe think outside the box to help small business owners overcome this issue.

I would like to ask you, if one of your colleagues or yourself could visit my dog walker's Facebook page as she has recorded a video over the last week showing what she does and how she controls dogs in her care & she also highlights the issues with the inconsiderate dog owners that she sees on a daily basis whilst at work!!!

This may help the council to make a more informed final decision.

I am writing to express my concern on the proposal of changing the amount of dogs one person can walk at any one time.

My concerns are as follows:

If people are dependent on the need of a dog walker, due to work, illness or age etc., this could

impact their ability to be able to afford a dog walker. A dog walker is running a business & if they are limited to 4 dogs per walk then they would naturally have to increase their prices which some people may not be able to afford.

This could have an impact on dog wardens & the amount of dogs being surrendered to rescue shelters as people won't be able to walk the dogs themselves.

I fully understand that some people, both professional walkers & individual owners, are not being responsible when it comes to walking their dogs. However, I would say that this is the minority rather than the many.

How would this proposed new law be policed? I'm sure that local residents would rather the already tight council budgets are utilised in more important areas such as road maintenance, support for elderly, support for youth & support for local mental health support etc.

As an alternative, would you consider ensuring that all professional dog walkers are registered with the council. This could also incur a small fee which would increase council revenue.

I would be happy to have a more detailed conversation with you should you wish to discuss further.

I would like to object to the proposed 4 dog rule in a public place. I'm not a professional dog walker (I only have 1 dog), but the majority of the professional dog walkers I see on a daily basis are responsible dog walkers. This proposed rule will jeopardise lively hoods and could end the business of responsible professional dog walkers. You are always going to have few that spoil things for everyone. There are loads of people who rely on these dog walkers on a daily basis.

Maybe the council could have a licensing system, which could be used to ensure that the dog walkers who are abiding by the rules are not penalised.

I am writing to object to the proposed additional offence to the control of dogs - the 4 dog rule.

My husband and I are both full time working adults who rely on the services of dog walkers during the day. Our dog walker is an extremely competent and fully insured to walk 6 dogs at a time. Introducing this rule would impact families such as mine as well as many others who rely on similar services. In addition this would have a dramatic impact on her ability to earn a decent wage. You're proposing a reduction of 33% in her income! How is this good for the economy?

I appreciate that I do not fully understand the rationale behind this proposed additional offence; I am not convinced that there is a one size fits all approach. Businesses that are licensed and insured to work up to 6 dogs should be allowed to do so. Or your rule needs to say you can only walk 4 dogs unless you are insured to walk more. This shouldn't be penalising businesses within our community.

As a dog owner who uses a dog walker regularly this new ruling impact on our lifestyle and the health and wellbeing of our dog as our dog walker would possibly be unable to walk our dog and the impact on their business would be huge.

It has come to my attention that Bromley Council has proposed an additional offence in relation to the control of dogs on public land in the borough. I find it unbelievable that by restricting people to walk no more than four dogs at once is acceptable. I was previously a professional dog walker and had never had any issues walking a pack of dogs; I personally had a limit to 6 dogs per walk, although was perfectly relaxed to walk more. When I was still walking, I would find it was people with just one dog that had more issues with their dog causing a nuisance for others as they didn't have a pack. Dogs walk in a pack and stay within their pack.

There are many unprofessional “dog walkers” out there that have no insurance or certificates and very irresponsible, but to penalise people who actually are responsible walkers OR people who actually have 5 dogs they own, usually down to rescuing dogs. I grew up around a family that had 7 large dogs in one household; this would be unfair to have to do 2 separate walks every morning and evening.

I spend a lot of my time abroad where they don't allow dogs off lead, as a vast majority of the population in that country are scared of dogs, and it really is so sad to think that this country is making so many rules and restrictions of people that in the end people just won't want a dog, as why have one that can't enjoy their walk. It is totally unnecessary and the emphasis should be more on having the right people, who are licensed to walk more than 4 dogs that have proved themselves as responsible people.

I am writing to you as I have recently become aware of the restrictions on dog walking that are proposed by Bromley Council.

I rely on a dog walker and dog day care to take my dog for daily walks whilst I am at work to maintain his needed level of exercise and his quality of life. I'm sure you would agree that it would be cruel and neglectful of me to leave a dog locked inside for 8 hours with no interaction or space to exercise for 5 days a week.

We, as a family, spent a lot of time asking for recommendations for a reliable, trustworthy and friendly person to take care of our dog during the week. We found someone who was all of these things, fully insured to walk 6 dogs at a time. Imagine our surprise when we were told that they may not be able to continue their dog care business as the new restrictions imposed by Bromley Council would mean that their business, and other dog walkers, would no longer be viable.

I understand that there have been instances of walkers with too many dogs that are not within their control but please do not let the few tarnish the reputation of the many. Our dog walker is not the only person who will be affected by these new restrictions, it will affect many trustworthy, reliable and sensible dog walkers and in turn will affect the families that rely upon those dog walkers to help take care of their pets.

I am writing to express my concern regarding a proposal to limit the number of dogs that any individual may walk at one time, to a maximum of four animals per individual.

Whilst I could understand the annoyance caused by irresponsible people who fail to supervise, control and clean up after their dogs, surely there must be an exception to this proposed 4-dog limit.

Many responsible, loving, and sometimes elderly, dog owners employ professional dog walkers, who are licensed and insured for up to six dogs, and who follow a professional code of conduct - ensuring the animals in their care are well controlled and who clean up after them.

It seems unfair to in effect, to punish those professional dog walkers who are registered and insured, and who have built up a business based upon good practice, Good reputation and their clients, who rely upon them.

I have used my dog walker for almost 4 years. I am 53 years old and have MS so need additional walks for my dachshund, Twiglet. He is my only dog and he benefits from his group walks, where he is able to socialise with other dogs and go for longer walks than I can manage. She has already made sure Twiglet complied with all requirements in order to walk him, such as statutory requirements e.g. microchipping, identity tags are clearly visible and other healthcare best practices e.g. twiglets vaccinations are up to date.

Please consider making reputable, licensed, insured and registered dog walkers, an exception to this 4-dog maximum rule.

I am writing to object on the above proposed consultation.

I use a dog walker who has walked my dogs for the past 3 years. If you cut her numbers of dogs down she will lose business & have to give some of her dogs up.

She is fully insured & is very capable of walking 6 dogs. She knows my dogs well & has always shown responsibility for all the dogs she walks.

I hope this email is taken into account if the consultation is decided.

As dog owners in the borough and regular users of a licensed dog walking/daycare service it has been brought to our attention that there is a proposal to limit the number of dogs walked per person in a public place to 4.

While we appreciate there will always be some people who walk too many dogs while being unable or unwilling to control them – we believe the proposal is unfair to the many excellent dog caring small businesses in the borough who provide an important, responsible, professional service. We understand that insurance payable by these businesses allows up to 6 dogs and therefore see no reason to limit the number further in our parks.

At a time when we should be promoting small businesses in Bromley if this proposal goes through then it could put many out of business (or push them to break the byelaw... not a good precedent to set - if they want to stay in business).

So, as dog owners who rely on professional dog caring businesses in Bromley we firmly oppose this unnecessary restriction. A sledgehammer to crack a nut maybe?

I oppose the proposed introduction of a new offence in relation to Control of Dogs on public land in Bromley Council.

I understand from your Notice dated 10.12.19 that you would like to impose a limit of one person being in charge of no more than 4 dogs at a time in a public space. Prior to this I believe that there has been no limit imposed.

As I am sure you are aware DEFRA (Department of Environment, Food and Rural Affairs) Guidelines favour an upper limit of being in control of 6 dogs at a time. The RSPCA and Dog Trust guidance limit for Dog Walkers is also 6. As a dog owner, I rely heavily on a local responsible Dog Walker who regularly walks up to 6 dogs at one time. He provides a very professional service, is very experienced and is insured to walk up to 6 dogs at one time. Such a person is perfectly capable of walking 6 dogs safely at one time and he has never experienced any problems at all in doing so. Were he to be limited to 4 dogs, it would not make his business model financially viable and myself and our wider community would lose this valuable and important community service. It is essential that we have responsible dog walkers to ensure that dogs are walked appropriately and safely and not only do these dog walkers provide a valuable service to dog owners, but they help keep our open spaces safe for other public space users by their presence in these sometimes enclosed and remote areas at various times of the day.

My Dog Walker would actually welcome dog walking becoming a licensed activity if it helped remove

some of the sub-standard walkers that he sees almost daily. Such people often walk more than 6 dogs at a time, are uninsured, fail to pick up dog waste and clearly in his opinion have little understanding of dog behaviour or responsibility when it comes to having other people's dogs in their care. It seems clear to us all that the intention behind your proposal is to stop such walkers who are in effect doing it as a hobby for some cash in hand. However in effect it would be punitive to those responsible Dog Walkers on whom we rely to provide their excellent, professional and valuable service and would drive them out of business.

I ask that your limit is extended to 6 dogs per person for the reasons set out above.

Please do not hesitate to contact me if you require any further information or comments.

I have just seen the announcement in a Petts Wood group and I would like to make a few comments as a dog owner.

I believe that the rule to put a dog on a lead when ordered needs a definition of who an authorised officer is – however, I see this is an existing rule that I knew nothing about.

As to the main change - I personally and honestly believe that five dogs or one really makes no difference what so ever, this sounds like a blanket rule that sounds good in practice but will do little in reality.

My Westie was attacked by a Jack Russell in Willett recreation ground a long while ago – the owner was very apologetic, but, I've seen her over the years attempt to walk her dog without a lead in the park and rush to put it on if she sees another dog...

the fact is, dogs are animals and I understand that anything can happen at any time but fundamentally you can either control a dog or you can't. I believe it should simply be easier to class a dog as dangerous and/or ban owners from having dogs if they can't keep a dog under control – this excludes anyone who is fully aware and keeps their dog under control - For example, I had a second Westie who was a very abused rescue – she would aggressively bark, however, I am an experienced dog owner and would never take her off the lead, and would warn others.

I can't say I have seen anyone walk more than 4 for some time, however, maybe again the rule should be changed that you need to be assessed in order to be a dog walker or commercially look after dogs (there are rules for performing animals/home assessments, so, I don't see this as out the ordinary) as this will raise the calibre and quality over the borough.

As a polite request – please bring back dog waste or just generic refuse bins! Walking the block near where I live, 5 years ago, I would pass 6 refuse bins and 2 dog waste bins... Nowadays, there is one bin! I'm a good owner and have had to carry waste for the best part of 45 minutes during a walk sometimes. I swear other than laziness, this is one of the main reasons dog owners leave their waste and I'm fed up of having to avoid it when I go to pick up my own dog's mess. It makes a disgusting task in to an even more disgusting one.... I really think that a fine of £100 should be higher still.

I am writing in my private capacity rather than an official one.

I'm a dog walker myself and thus regularly in Chislehurst and Walden Rec. I have to say that the 'professional' dog walkers we get there are fine and it is not often we see more than 4 dogs being walked at a time. There are a very few private individuals who have more than 4 dogs (small breed) and this would disadvantage them being able to walk them all together; again I personally have not experience or heard of any issues regarding them so see no need to change the current arrangements.

We do, however, get some inconsiderate dog walkers who do not clear up after their dogs and the

Friends have been running a campaign for years now and providing free dog poo bags. The problem continues nevertheless. I have no issue with you raising the penalty amount but I fail to see it will make any difference unless you employ people to enforce this. Are there any plans to do so? I recall from previous years the number of enforcement penalties issued across the Borough is ludicrously low.

When will the outcome of your consultation be known please? If you do go ahead and implement can we please have some posters for the Rec?

I am writing regarding your advertised proposal to introduce a new fixed penalty offence for persons being in charge of more than four dogs in a public place.

I fully sympathise with the concerns of the public and the Council about irresponsible dog walkers who exercise large numbers of dogs, which they are unable to control or properly manage, in our public parks and spaces.

However, there are many highly responsible and professional dog walkers whose livelihood would be threatened by reducing the limit to four dogs at a time. We employ a local dog walker who is extremely professional and has the highest standards in terms of the required behaviour of the dogs (and their owners!) in his charge. He is fully insured, and his insurance covers him to walk six dogs at a time. Enforcing a change of local laws to reduce this number to four would reduce his income by a third and potentially make his business unsustainable.

It is my understanding that DEFRA guidelines suggest 6 dogs as the upper limit, as do the RSPCA and the Dogs Trust. It seems to me that there should be consistency on this matter across public bodies and I would urge you not to introduce this new order. I would suggest, instead, that the Council considers making professional dog walking a licensed activity, so that only people with the appropriate skills and understanding of animal behaviour are allowed to walk groups of dogs in our public places.

I'm emailing to express my concerns re the proposed 4 dog limit in Bromley council parks. I own my own dog walking business and have run it successfully for the past five years. I walk up to 6 dogs on each walk; this is the recommended limit as stated by DEFRA, dogs trust and also most insurance companies. I am animal care qualified, first aid trained, public liability insured and have built my skills and experience over a long period of time. If the council decide on a 4 dog limit it will undoubtedly have a massive effect on my business. My earnings would be cut by a third whilst my outgoings will still be the same and I'd have to potentially part with current clients. Or I would be forced to work longer hours, which in the winter would mean dark walks which simply isn't safe for myself or the dogs.

I, like many others are very careful in deciding which dogs join our group walks in order to keep a calm and well behaved group. It is not merely a money making scheme. Many of the dogs I care for are rescues and without walkers would most likely still be in rescue centres as their owners are at work all day.

Upon looking at your website I was unable to find any information on the new proposals. In fact, I only found out about it myself due to another walking spotting a letter stuck to a tree in Well wood. I also have various contacts who are licensed boarders for up to 6 dogs who the council have also not informed of the changes. I walk in various parks in the Bromley borough and haven't seen a letter on any other park notice board. Can you confirm where these letters have been distributed to allow others to voice their concerns?

I would also like to know why 4 is the number of dogs chosen and deemed safe? As stated previously, DEFRA recommend 6 as a limit, as do many insurance companies. In my personal experience it only takes one troublesome dog to cause a problem, issues arise when dogs are badly behaved, not if there's 4, 5 or 6. Why is 4 the magic number? Croydon council have a 4 dog limit, what I often see in that area is supposedly pro walkers hiring someone to walk with them, often with no experience, consequenting in groups of up to 8 dogs. Now that IS too many! I worry that if Bromley bring in the proposed same rule that this will be the outcome. Us as walkers can only charge so much for a walk so we may have no choice but to hire staff also, close down, or do even more walks for the same money, and spending even more time in public parks. Would it not be better to have a dog limit of 6 per group regardless of how many people are present? This would prevent excessive numbers of dogs and walkers all going around together.

I often experience individual dog owners, particularly in Crystal Palace Park, whose dogs are off lead while owners are on the phone, talking with friends, jogging or generally not paying attention. These are the same people who often fail to pick up after their dogs poo, I often offer these people a bag, or just pick it up myself – the glamorous life of a dog walker! When real pro walkers take dogs out, they are our sole focus. We do watch them 100% of the time. We don't allow for unruly behaviour. And if any unwanted behaviour was to occur dogs are immediately put on the lead, and we are perfectly capable of walking 6 on lead if we need to, I have done this a few times during the summer when there's tempting picnics about. I do understand that not all of us are so strict with the dogs in our care, but the majority of us are. Is there a way of having the legitimate walkers licensed and registered? Similar to the daycare and boarding license? If we wore ID tags and members of the public have an issue with a specific walker, then that can be reported via an ID number. Can I also ask what some of the concerns raised with walkers were?

During your consultation, would you be able to tell me who if any of your decision makers will have a pet related background. I would like to think that the decisions being made are made by a neutral party. And are not just based on complaints alone. I'm sure if you look on many of our websites you'll find as many more glowing reviews for walkers than you've had complaints. Surely it needs to be a fair panel?

I genuinely feel there must be a better solution for the issues being raised. Whilst I do agree there are a few irresponsible walkers, I think it is completely unfair to punish the many and most likely put some out of business for the sake of a few bad ones. I do agree that something needs to happen to address the concerns but I think there should at least be some further discussion and we should all be allowed to put our ideas forward as local residents and hard-working small business owners.

I have used my dog walking/daycare service for a number of years on a weekly basis and also for holiday boarding. This is a licensed business, approved and inspected by Bromley Council for 6 daycare/boarding dogs in addition to the owner's dogs.

Also:

- Dog walkers' insurance covers for 6 dogs
- DEFRA guidelines favour 6 as the upper limit
- The RSPCA and Dogs Trust guidance is 6 dog limit.

I would welcome dog walkers being a licensed activity if it removed some of the irresponsible dog walkers who have little understanding of the responsibility they have to the dogs in their care and to the community at large. However, businesses like my dog walker/daycare are in a different league, with standards that are extremely high. Why should they be penalised because of other dog walkers bad behaviour? Just reducing the number of dogs to be walked is not the answer, and won't mean that some dog walkers act more responsibly. I would be very interested to know what consultation this plan has had. If complaints have been made regarding specific dog walkers, can they not be followed up, rather than a blanket approach to all dog walking businesses.

As a dog owner, resident of Bromley, who relies on a highly professional, dog caring business, I firmly oppose any plan to make walking more than 4 dogs an offence for a licensed business, approved by Bromley Council.

I am emailing you about the consultation restricting the number of dogs that owners/paid dog walkers can walk with.

I do not think that this rule is helpful to dog owners or local dog businesses like walkers and boarders. The majority of owners and walkers take great responsibility in looking after their dogs and ensuring that they do not cause a nuisance to members of the public. The few who don't do this should be directly targeted rather than a blanket rule that will have unintended consequences to those who are responsible.

I am a dog owner and I also run my own business as a business coach.

I have recently found out that the Borough of Bromley wishes to reduce the number of dogs a person can walk at one time to 4 instead of 6.

I use a dog carer on a regular basis and she has a licence to walk 6 dogs at a time. In fact, I now pay more for dog care to cover the cost of that licence.

If she can't walk 6 dogs at a time, she could potentially go out of business because her income would fall so much that she wouldn't be able to cover her living costs.

While I understand that there will always be some people who walk too many dogs and don't keep them under control, I believe the proposal is unfair to the many excellent dog caring small businesses in the borough who provide an important, responsible, professional service.

It seems crazy that dog carers have very recently had to pay for a licence and get insurance to walk up to 6 dogs, but Bromley council is reducing the number to 4.

As a business coach, I do what I can to help small businesses succeed and thrive. I thought that Bromley also wanted to help small businesses. But if this proposal goes through then it could put many small dog caring organisations out of business.

So, as a dog owner who relies on professional a dog caring businesses in Bromley, I firmly oppose

this unnecessary restriction.

I'm emailing as a dog owner, and regarding all the other boroughs that reduced to this four dog rule, did actually cause Crystal Palace Park to become very busy with dog walkers with six or more dogs. I can understand more than 6 dogs would not be manageable, but I don't object whatsoever to a group of six dogs, as my dog walker is insured for six dogs plus that is DEFRA guidelines, so I don't understand why all boroughs are reducing to four dogs in a group in parks.

I think Bel Air in Dulwich actually allow six, three off lead and three on lead.

You get many irresponsible dog owners with just one/two dogs too so it's not just dog walking businesses, most dog walkers that I do see with six dogs, their dogs are all under control and seem happy.

If Bromley heads this way too, it is really going to affect small businesses plus dog owners, as this will cause a reduction in numbers and dog owners possibly having to find alternative care.

Why can't Bromley keep to six dogs with four off lead and two on lead please as this would make sense to me with you coming into line with the DEFRA guidelines of six dogs per walker?

When all this four dog rule was introduced in other Boroughs, did they even think to consult dog pet minding businesses at all? Have you done the same?

So I'm hoping that the Bromley borough will see sense and keep to six please with two being kept on a lead as surely this will work just fine in my opinion, as I could be affected by this with my dog walker too, with maybe having to reduce numbers and saying goodbye to some clients.

Also there are several dog owners who I know that have five dogs and this will just cause them to have to split their walks too.

As far as I'm concerned it is not intimidating seeing a group of six dogs whatsoever and it saddens me that small businesses and dog owners would be affected by this if Bromley reduce to four dogs per walker/dog owners too.

I am a member of Friends of Cator Park & Alexandra Recreation Ground and have been using Cator Park almost daily as a parent and a dog owner for the last 30 years. In this time I have not had any issues with people walking groups of 4 or more dogs. My view is that this additional offence is not needed. The existing four offences are sufficient.

I have met several professional dog walkers in the park recently while walking a friend's dog. These have been walking groups of more than 4 dogs all of which have been well behaved and are in fact an asset as it provides an opportunity for dogs to socialise. An important need for pack animals such as dogs. The new offence will greatly reduce the viability of professional dog walking. This is a service that is also an asset for many people including elderly and infirm owners who benefit greatly from the companionship of dogs but are not able to walk them themselves.

Where I have had issues with other dogs these have been with single dogs and generally due to the attitude of and lack of control by their owners. The number of animals is not relevant.

You say in your consultation notice that there are growing concerns about increasing numbers of uncontrolled groups of dogs being walked by one person. The key word here is "uncontrolled". Uncontrolled dogs are a concern even when there is just one. My view is that the existing four offences are sufficient to deal with the issue of uncontrolled dogs whether in groups or singly.

I also note that the notice refers to concerns rather than evidence. Is there any body of factual evidence supporting the concerns? Introducing a new offence that could impact on the livelihood of professional dog walkers without the support of factual evidence is unwise.

With respect to the proposed increase in fines for the existing offences I feel that this is unnecessary as the existing level is sufficient. As the former Metropolitan Police Commissioner, Sir Robert Mark, said the greatest deterrent is the fear of detection. In the recent years that I have been using the Park it is very rare that I have seen an authorised person in a position to enforce these regulations. If there are insufficient officers to patrol the parks, such that the risk of detection is low, changes in the offences and increasing the level of fine will have little impact.

I am writing to you with regard to Bromley Council's proposed four dog rule which applies to dog walking throughout the borough.

I have been a self-employed dog walker for the past six years. I have full liability insurance, am first aid trained and have never had as much as a cross word from any of the dogs in my care. I am insured to walk up to six dogs at any one time, and have been doing so since my business was born in April 2014.

I am bitterly disappointed that Bromley are proposing this new rule, on what I can only assume is a blanket approach to all dog walkers. I have many clients who work full time, who rely on the service that I provide. My walks are carried out in a calm, responsible manner and we are respectful of other people using the public spaces around us.

I appreciate that there are many other dog walkers, who do not take the same professional approach as I do, however I feel it is greatly unfair that we should all be punished in the same way.

DEFRA's guidance states the maximum number of dogs one person can control is six. The kennel club mirror this guidance also. I would ask that you consider this in your proposal.

I propose a licensing scheme, where professional walkers such as myself, who are insured, are licensed by the council to operate in the borough with an allowance of six dogs. This would also bring in further revenue for the council.

I await your response.

I am sending my own opinion regarding this matter. I am an owner of 6 small dogs, all are rescue dogs. I take them for a daily walk at my lunch break. They are well behaved. Only 1 dog needs to stay on the lead, the rest is obedient and well behaved. We never ever had any incidences with people or other dogs.

I am concerned about the limit put on the number of walking dogs. I cannot take 2 hour break to walk dogs twice. Who will I leave behind every day?

I live in Chislehurst now for 21 years. There is only 1 dog walker who brings 8 or more dogs for a walk at once. He controls the dogs at all times. Have never observed otherwise. But I can understand the other members of public when they see so many dogs suddenly roaming around in the park.

Certainly we dog owners and tax payers cannot be punished because 1 individual who floods the park with dogs over 1 hour a day!

Please consider my view when making decisions which will have an impact on multiple dog owners.

As dog owners in the borough and regular users of a licensed dog walking/daycare service it has been brought to our attention that there is a proposal to limit the number of dogs walked per person in a public place to 4.

While we appreciate there will always be some people who walk too many dogs while being unable or unwilling to control them – we believe the proposal is unfair to the many excellent dog caring small businesses in the borough who provide an important, responsible, professional service. We understand that insurance payable by these businesses allows up to 6 dogs and therefore see no reason to limit the number further in our parks.

At a time when we should be promoting small businesses in Bromley if this proposal goes through then it could put many out of business (or push them to break the byelaw... not a good precedent to set - if they want to stay in business).

So, as dog owners who rely on professional dog caring businesses in Bromley we firmly oppose this unnecessary restriction. A sledgehammer to crack a nut maybe?

I am writing in response to the notice (regarding the above) posted in local public parks which I use regularly.

Whilst I feel the existing four offences affecting designated public land are rightly in place, I consider the new proposal of being in charge of no more than 4 dogs in a public place wholly unfair for those who run a reputable dog walking service.

These services take a lot of time, planning, consideration and expense to set up. We have had a regular dog walker for six years; before we engaged him, we asked about his experience as a dog walker, where he would be walking our dog and how many dogs he'd walk as a group; on his group walks he walks a maximum of six dogs. We also asked about his insurance and know that he is insured to walk six dogs at a time. This is his livelihood; the service is run as a professional concern and to limit dog numbers to four would have a tremendous impact on his business and we his clients. We are fully confident that he can handle and control six dogs and have seen him doing so many times.

I have checked DEFRA guidelines and see these approve 6 dogs as the upper limit and the RSPCA and Dogs Trust guidance for dog walkers is also a 6-dog limit. It seems therefore, inconsistent that Bromley are suggesting this new rule.

I am interested to know which park user groups and 'stakeholders' have expressed concerns regarding the number of dogs a walker is in charge of? I walk our dog regularly in Crystal Palace & Cator Parks and Alexandra Recreation Ground and have never witnessed any dog walkers who are not able to control the 4+ dogs they are walking. On the contrary they are always very attentive, have good control of the dogs and are conscientious in picking up dog waste.

I would ask you to give careful consideration to the points I have raised as the council discuss the new proposal and would appreciate a response to this letter.

I am writing to object the above proposal.

My dog walker currently walks (and is licenced to walk) up to 6 dogs. She is very responsible and extremely professional and I don't think it's fair to change the current policy due to a minority of irresponsible dog walkers who purely do it for money and don't care about the dogs or the public places they walk.

She regularly picks up other people's dog waste and her dogs are extremely well behaved and sadly if this proposal is accepted she might not be able to continue with her business.

Please could you log my objection and keep me notified of any decision.

I wish to register an objection to the four dog walking rule which may be coming into force.

I use an extremely reputable dog walker for all of my dogs. She is extremely competent and never would allow a dog to be out of control. Unfortunately it is not the dogs or the number of dogs which are a problem. It's the owners. They are often distracted, on their phones or just generally not paying any attention to where their dogs / dogs are.

If you want to restrict the number of dogs being walked at one given time then why not introduce a license scheme with a small fee. This would then wheedle out the good from the bad.

You would potentially put a lot of local businesses out of action with this rule - please make this a top priority consideration.

As dog owners in the borough and regular users of a licensed dog walking service it has been brought to our attention that there is a proposal to limit the number of dogs walked per person in a public place to 4.

While we appreciate there will always be some people who walk too many dogs while being unable or unwilling to control them – we believe the proposal is unfair to the many excellent dog caring small businesses in the borough who provide an important, responsible, professional service. We understand that insurance payable by these businesses allows up to 6 dogs and therefore see no reason to limit the number further in our parks.

At a time when we should be promoting small businesses in Bromley if this proposal goes through then it could put many out of business (or push them to break the byelaw... not a good precedent to set - if they want to stay in business).

So, as a dog owner who relies on professional dog walking businesses in Bromley we firmly oppose this unnecessary restriction.

I wish to submit my comments on the consultation to reduce the number of dogs allowed to be walked in Bromley. My dog walker operates in your area and this proposal could see a responsible small business owner, who provides an essential service in the community, cease trading. I appreciate there is a need for dogs to be under control in public places but couldn't there be additional regulation or permission for certain individuals, rather than a blanket ban that will penalise those who are working honestly.

As a dog owner in the borough and regular user of a licensed dog walking service it has been brought to my attention that there is a proposal to limit the number of dogs walked per person in a public place to 4.

Whilst I appreciate there will always be some people who walk too many dogs while being unable or unwilling to control them – I believe the proposal is unfair to the many excellent dog caring small businesses in the borough who provide an important, responsible, professional service. I understand that insurance payable by these businesses allows up to 6 dogs and therefore see no reason to limit the number further in our parks.

At a time when we should be promoting small businesses in Bromley if this proposal goes through then it could put many out of business (or push them to break the byelaw... not a good precedent to set - if they want to stay in business).

So, as a dog owner relying on a professional dog walking business in Bromley I firmly oppose this unnecessary restriction.

Thank you for the opportunity to respond to the proposed changes in ruling re dogs in public spaces.

I am a dog owner and utilise all the parks in Bromley. As a dog owner I see dog owners and professional dog walkers daily.

99% of dog owners I see in Bromley act in a responsible fashion, they are aware of their dogs' whereabouts, they monitor them to make sure that they do not cause stress to any member of the public and clean up any foul. In fact we always call out to each other if we have seen their dog doing a poo and the owner comes over directly.

Dog walkers are even more vigilant. They are aware of how the dogs mix together and are quicker to put a dog on lead if they sense any discomfort. They are more than able to monitor 6 dogs... they know them... every dog has its own schedule of pooing for example, so they walkers are armed with multiple bags. All the pro dog walkers I know, know which dogs might react in different circumstances and again will distract them with treats or put them on leash if necessary.

Here is the problem with the proposal:

- 1) Reducing the number of dogs on a walk will make a very low paid job impossible to sustain.
- 2) This will lead to less dog walkers (and there really aren't that many in Bromley) thereby taking dog owners who need to go out to work in a position where they cannot work effectively.
- 3) If numbers reduce, then the cost of dog care will increase massively
- 4) What is the actual problem with 6 dogs? Dog walkers will only take that number IF the mix of dogs works, dog walkers are rightly picky about which dogs they accept into the walking group.
- 5) As their license is to 6, why reduce to 4 dogs... which 2 dogs have to be left at home on their own for a couple of hours whilst the other 4 get to have exercise and sensory fun?

I would be interested to hear why this proposal has come in in the first place... are people perceiving a threat of dogs where there is none? Dog walkers don't take on volatile or reactive dogs... they are aware of their license and their livelihood.

I agree that everyone should pick up dog foul... sometimes you can't find it (leaves etc. make good camouflage) but then you pick up a poo you can see... like carbon offsetting!

Sometimes I meet families who are afraid of dogs and I show them a couple of tricks, chat with them and within minutes they are petting the dog... so maybe there needs to be a little more interaction with people who don't have awareness of dogs and "dog language".

Dog owners and dog walkers use the parks and public spaces every day of the week, in all weathers and all seasons. Please do not restrict our use of an essential resource due to a couple of complaints from people who might perceive a threat (which might not be based on fact) who use a park on a

sunny weekend.

As a dog owner in the borough and regular user of licensed dog walking services, it has been brought to my attention that there is a proposal to limit the number of dogs walked per person in a public place to four.

I believe the proposal is unfair to the many excellent dog walking services in the borough who provide an important, responsible, professional service. Reducing the number of dogs they can walk will be detrimental to their flexibility, so will cause problems for their clients as well as reducing their income. As the insurance paid by dog walkers allows up to 6 dogs, I would question why they should not be permitted to walk this number.

At a time of economic difficulty, shouldn't we be promoting small businesses in Bromley? This proposal could drive people out of business and onto benefits.

I do, of course, appreciate that there are probably irresponsible dog walkers and I don't question the need for measures to deal with those - but I fail to see why the majority of responsible dog walkers should be penalised due to the behaviour of a minority. The proposed solution is akin to reducing the sale of glass bottles, cans and cigarettes due to the problem of broken glass, discarded cans and cigarette ends littering public places - i.e. simply not fair on the majority of responsible citizens.

As dog owners in the borough and regular users of a licensed dog walking service it has been brought to our attention that there is a proposal to limit the number of dogs walked per person in a public place to 4.

While we appreciate there will always be some people who walk too many dogs while being unable or unwilling to control them – we believe the proposal is unfair to the many excellent dog caring small businesses in the borough who provide an important, responsible, professional service. We understand that insurance payable by these businesses allows up to 6 dogs and therefore see no reason to limit the number further in our parks.

At a time when we should be promoting small businesses in Bromley if this proposal goes through then it could put many out of business (or push them to break the byelaw... not a good precedent to set - if they want to stay in business).

So, as a dog owner who relies on professional dog walking businesses in Bromley we firmly oppose this unnecessary restriction.

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So, as a dog owner who relies on professional dog walking businesses in Bromley we firmly oppose this unnecessary restriction.

I am writing in relation to the proposal of the 4 dog maximum rule that Bromley would like to impose.

I am a professional dog walker based in West Wickham and am upset to see that we are going to be asked to walk only 4 dogs at a time.

I take pride in my business and I am good at my job. I daily pick up litter, discarded dog poo bags, and dog poo that do not belong to me or my pack.

I only take on well behaved dogs, with good training and am very considerate to all other park users. I find it very annoying that people believe that it's the professional walkers that seem to cause a nuisance, when regularly I see owners with their own out of control dogs, talking on phones, doing their daily jogging, gossiping with friends oblivious to their dog fouling or being a nuisance to other park users.

Of course as with all trades there are some unprofessional walkers who aren't good at their job, however these people aren't going to listen to this new rule regardless, whereas the professional walkers will abide the rules and will have to take the money cut.

What I would like for Bromley to take into account is raising the 4 dog to a 6 dog maximum. This follows the KC club guidelines and is what we are currently insured to walk.

I am a single mother who created this business to work within school hours for my Son. I physically will not be able to do additional walks due to the time frame I have to work in. This change in dogs will lose me £48 per day, £240 per week!

There are many other points I could put across, but these are the main ones from me.

We are dog owners who live in Bromley and who use many of the parks and green spaces. It has been brought to our attention that there is a proposal by the Council to limit the number of dogs walked per person in a public place to 4 and that you are currently in a consultation period on this. We would like to put forward that we firmly oppose the introduction of this new offence.

We regularly use a wonderful licensed dog walking/daycare service, who we trust completely and is meticulous and professional with the care of the dogs and keeping them under control. We appreciate that there are a small number of 'dog walkers' that may walk too many dogs and do not have full control over them - however it seems extremely unfair to penalise the many responsible dog owners and excellent licensed/insured dog walking small businesses for the actions of those few that are irresponsible?

Many of these small businesses provide an important, responsible, professional service and this reduction in the numbers of dogs that they are able to take on would almost certainly put some of them out of business. We also understand that their insurance allows up to 6 dogs and therefore see no reason to limit the number further in our parks.

We sincerely hope you will reconsider this proposal of a new offence and find a different solution to controlling those small few dog walkers who are unable to control their dogs. An irresponsible dog walker will still be an irresponsible dog walker, regardless of whether they have 4 or 6 dogs in their care. Your proposal may seem like an easy short term solution to a reported problem, but it will not solve the issue in the district and will detrimentally affect local small businesses.

We look forward to hearing from you, and we would be very happy to discuss this further,

I would like to express my support for the local dog walkers in light of the recent proposal of banning them from walking no more than 4 dogs at a time.

I rely heavily on my dog walker as I work full time and need the service that she provides.

In all the time I have been using her, I have never heard of her having a problem whilst walking the dogs and she runs her business at a very high standard.

I am writing to you to oppose the introduction of the new offence proposed by Bromley Council: Being in charge of more than 4 dogs in a public place.

I am a professional dog walker who carries full insurance to walk up to 6 dogs, carries full public liability and appropriate motor vehicle business insurance, has been DBS checked, comes highly recommended by all of my clients and who wholeheartedly adores all the dogs/cats/rabbits in my care. I have turned my passion for animals into my livelihood and I couldn't imagine my life any other way. However, the introduction of this new offence could have serious implications for not only myself but for the many clients who rely on me and my services.

I pride myself on providing affordable and personalised care for each of my clients. By reducing the number of dogs that I would be permitted at any one time I would have to let go of up to a third of my clients and increase my prices for those remaining. I have dedicated much of my time, both inside and outside of traditional working hours, to vet, bond with and care for the dogs in my charge. Having to let any one of them go would be a massive blow for me financially but most importantly personally, as I care deeply for them all.

I follow professional standards which are laid out in the contracts given to my clients once my rigorous vetting process is complete. The dogs each undergo a two-week trial period to ensure they integrate well into the group, bond well with me and behave to the standards I expect of them. These standards include, among others, immaculate recall and appropriate social skills when greeting people and dogs outside the group. Meaning my dogs are always under control and are a pleasure for members of the public and other dogs to meet and greet.

My business insurance, DEFRA, The RSPCA and The Dogs Trust all agree that 6 is an acceptable number of dogs for me and other professional dog walkers to be responsible for. And that is exactly what I am: responsible. I take great pride in the fact I abide by the by-laws set out by Bromley Council, however, the introduction of this offence, I feel, will only penalise the responsible dog walkers. With no enforcement of this new rule, much like in Lewisham parks, the unprofessional, irresponsible and substandard dog walkers will continue to walk over the permitted number of dogs. Only the professionals who want to remain on the right side of the law and uphold the reputations we have worked so hard to maintain will conform.

I, therefore, endorse the idea that dog walkers must apply for and hold a Bromley council approved licence to walk six dogs in Bromley parks. The revenue raised from such a scheme would fund the presence of more wardens and/or community support officers in our local parks to ensure that ALL Public Spaces Protection Orders are monitored and enforced.

I have asked my clients to make contact with you to communicate the vital role professional dog walkers have in the community and to their lives personally. On behalf of my clients and my professional dog walking colleagues, I implore you to consider my arguments and endorsements so that the community as a whole can benefit from any changes Bromley Council seek to implement.

I am writing to you to oppose the introduction of the new offence proposed by Bromley Council: Being in charge of more than 4 dogs in a public place.

As a dog owner who works full time, I rely on an amazing dog walker who is fully insured, fully qualified and fully vetted and abides by every legal and moral obligation to care so lovingly for each and every one of her dogs.

She currently is licensed to walk up to six dogs at one time, allowing her to take on a certain number of clients at a certain cost. Should this proposed offense be approved, this would gravely affect her business, forcing her to reduce the number of dogs she has been able to care for as well as increase the price she charges for care.

Besides from the obviously detrimental effect on her livelihood, it would put me - and my dog - in a terrible position, whereby I would either incur financial strain or else force me to drastically rethink my working life if I could no longer afford dog care services.

It may not be obvious to you, but these decisions have a huge knock on effect for so many people and animals and I do not believe this proposal would serve the common good.

It seems obvious that there are easier and more effective ways to achieve better control of dogs in public places, for example, requiring licenses for professional dog walkers and imposing fines on the owners badly behaved dogs, as an incentive for them to ensure their pet behaved in a manner that did not cause nuisance or harm.

I am writing to you to oppose the introduction of the new offence proposed by Bromley Council: Being in charge of more than 4 dogs in a public place.

I know our dog walker has been in touch with you, and I would like to echo her concerns. The introduction of this new offence could have serious implications for her business and those of us who rely on her services - and those like us who rely on other reputable walkers. I feel strongly that this offence only serves to penalise the responsible dog walkers in the borough.

Having a dog walker / sitter that we know and trust is the only thing that enables us to have a work / life balance and a happy, healthy pet. We wouldn't trust our dog with just anyone, and if the introduction of this offence leads to reputable small pet care businesses going out of business it would be a tragedy. I would again like to highlight that DEFRA, The RSPCA and The Dogs Trust all agree that 6 is an acceptable number of dogs for professional dog walkers to be responsible for. As I know our dog walker has done, I, too, endorse the idea that dog walkers must apply for and hold a Bromley council approved licence to walk six dogs in Bromley parks. The revenue raised from such a scheme would fund the presence of more wardens and/or community support officers in our local parks to ensure that ALL Public Spaces Protection Orders are monitored and enforced.

I don't believe that reducing the dog walking limit from 6 to 4 will actually solve the problem that people seem to have. I'm thinking around picking up dog mess and dogs out of control.(you do not make it clear which problems you are referring too)

Will people not team up together and effectively larger groups of dogs will appear in our parks. Which is the opposite of what you may be trying to achieve?

How would this be policed?

I feel it's necessary to look at other ways to deal with the problem. Whether that's three dogs off lead at any one time maybe that should be explored.

Maybe walkers have a license and ID number again one to be explored. The income from this could

go towards the funding of an inspector/park person with some authority to fine/ see IDs etc.

Let's be honest dog walkers are the target. When it comes to Dog owners however there are those owners that do not pick up and it's almost impossible to prove. It would be interesting to see how many come from each category.

With regard to out of control dogs again quite often these are with the owners. Dog walkers often vet the animals before they take them on, know when to keep them on leads etc.

Dogs off the lead in residential areas to my mind should be looked at because they can cause many different accidents.

Again I don't think this is really walkers. Generally they will keep the dogs on the lead until it's safe to let them off. Anyone walking a dog in a residential area that is not on the lead should be prosecuted. How would you put this into action?

These are just my thoughts at this point in the consultation process.

I write regarding the above which in my opinion is yet again an overreaction to a "problem" that is virtually non-existent. If this is an attempt to curb the activities of professional dog walkers then be honest and say so. If this is the case then have them register then regulate their activities like you would any other business.

To issue a fixed penalty for having more than four dogs in a public place is ludicrous. There are many many well-meaning folk who have dogs then over the years take in others which often means they have more than four. The pensioner who is on their own and sees the dog as a companion will fall foul of this proposal as will the rate payer who has dogs for recreation. I have three gun dogs, if I have another does that mean I walk them in two groups or take along a family member?

Perhaps you can elaborate on who is an "authorised officer". We are all well aware of the numerous cutbacks we have seen in the Borough of the last few years and wonder who is going to take on the task of policing this??

This will be an own goal if introduced as I have said above if it is aimed at professional dog walkers then legislate accordingly, leave the private individual alone.

As a dog owner who regularly uses the services of a licensed dog walking/daycare service, I am horrified that there is a proposal to limit the number of dogs walked per person in a public place to four. Have you considered how that will affect someone who actually owns more than four dogs? Do you also realise how this will affect people who have to go out to work or go on holiday, people who rely on licensed dog walkers and their daycare/boarding services?

I appreciate that there will always be some irresponsible people who walk too many dogs and seem unable or unwilling to control them or to clean up after them, but it is unfair to penalise those who take their responsibilities seriously. Six dogs with an experienced dog handler is not too many, and their insurance policies allow up to six dogs so I cannot understand why you are being so heavy handed when there is no reason for it.

Small businesses in Bromley and indeed elsewhere, need to be helped and if this proposal goes through then it could put many out of business. Please think this through carefully as there are a lot of people who are very much against your heavy handed approach.

I am writing to support the case of properly registered and insured dog walkers against the proposal to limit the number of dogs per person to 4 in Bromley parks. I support the concept for normal dog owners/walkers, but people earning their living from walking dogs who occasionally need to walk more than 4 dogs should not be penalised. Can I suggest that if dog walkers can prove they are registered and insured then they should be allowed to walk (say) 5 or 6 dogs at a time.

I support the principles of dog control - what person wants to see dog fouling permitted as an example. However I have two issues:

1 The current four offences are simply not enforced. I speak as an owner of two dogs and one who has a local campaign against fouling of footpaths and recreation ground nearby. The types of people who allow poor dog behaviour are not put off by threats of fines, appropriate signage or any other action. Therefore, increasing fine levels will have no effect.

2 In charge of more than 4 dogs. I'm not sure what problem is being addressed here? The issues I've seen with dog bad behaviour, usually relate to single dogs. One or two dog owners with 4 or 5 dogs usually have them well under control. I assume this is an attempt to try to gain control over "professional" dog walkers, but if the issues are dog fouling, then I refer you to my point 1 above.

I therefore cannot support any change unless there is a step-up in enforcement levels - which, in these days of Council cutbacks, simply will not happen.

I am writing regarding Bromley Council's intention to limit dog walkers to four dogs. My dog walker, is really professional and caring, and is loved by all the dogs entrusted to her. If she were limited to only walking four dogs at a time, her livelihood might well be affected, as would mine and many others if she found it was not worthwhile to carry on caring for our dogs while we were working.

If it were possible for her to be granted an approved licence to walk six dogs at a time, it would mean many of us could continue working without worrying about leaving our dogs at home alone. I attach a picture of her at work. It shows the love she has for her dogs, and the love the dogs have for Amie. This love from her dogs shows the control and respect they give to her. Please consider this case carefully.

May I offer some comments as a Bromley resident of 20 years plus.

I am a private dog owner, not a business.

I feel strongly that limiting dogs from 6 for example to 4 would seriously impact local well run dog walking and boarding businesses.

Most well run business owners only accept dogs that are trained and well controlled. The problem is some owners who persistently allow dog fouling and do not have any control over their own dogs. They are the issue.

A business only stays viable if they can safely demonstrate their competency and being trusted. I use these services to further enhance my dogs' wellbeing if I can't be there for various reasons, appointments etc.

Owners should not be abdicating responsibility they should ensure that the dog is trained. And that they have assessed the business and given the relevant permissions and that their dog is safe out

with others.

Most issues I see in the parks are individual dog owners who really don't care. More damage is done with one badly trained dog than a few walked by someone who is in control of their dogs.

I think it is a perception issue and very much a regulation issue. People leave children's playground gates open, so dogs get in, cyclists cause danger by speeding around the park nearly missing all walkers. Please tighten up on the dog owners, without perhaps not targeting the dog walking/boarding businesses.

Bromley will be much disadvantaged if they have to close down. It's only in the actual parks that people seem to have issue's, it is often that most do not know what the regulations are.

How do you manage to enforce our existing dog regulations? I read your notices and check the website, lots of owners plainly don't as they allow their dogs to foul & don't pick up. I have never witnessed a business dog walker ever not pick up or correct their dogs. I often ask for their cards so I know who they are. If they did not do the right thing and obey the rules than I would not use them. How easy is it for anyone to register? Who inspects then and follows up? If you have bad business practice why not withdraw their licence.

So some information you receive is I feel in- accurate.

Please reconsider this addition to your regulations, please tighten and try to enforce the ones we have.

I believe that Wandsworth license covers 6 dogs what is their experience? Most people walking more than 4 dogs might have help. It is a matter of perception, dog knowledge, ability and common sense. Most dog owners are responsible, sadly not all, the dog walkers usually educate the poor owners & Direct them to trainers; it is an asset, not a problem. If Bromley Borough enforcement is lacking now, what will this law do except to shut business owners out that are providing an essential service. The insurers cover for 6 dogs so why rule at 4 it makes no sense. It's not the numbers it is the people concerned. You will have just the same issues with 1 or 4 it's people's inability to do the right thing and obey the rules.

I am against the new proposal of being in charge of 4 or more dogs per person.

I respond as a dog owner, but more importantly as a consumer of professional dog walking services. You may have noted the use of professional to describe my dog walker; I do so with strong meaning because when I first required someone else to help with dog walking, I never imagined the lengths someone would go to in creating such a professional service. This goes from the fully kitted out dog friendly van with travel cages and air conditioning, full insurance and the loving care and attention to the animals you have entrusted with them. I know our walker takes her job incredibly seriously, both from looking after the pets but also the social responsibility that comes with it, taking care when near other walkers, picking up other people's litter and ensuring her dogs are under control. This is a career choice for her, not a part time job.

The economics of the job seem to work with 6 dogs at a time and a requirement to not exceed 4 would put her out of business. You can understand that the van, kit and insurance do not come cheap. I can imagine this would be the same for a lot of dog walkers and as a consumer I think this proposal would have a detrimental effect on the local industry, severely limiting choice, the potential quality of the services provided and animal welfare.

People who are unable to walk a dog may be faced with no viable option and those walkers that continue to operate on the breadline will potentially find ways of cutting back, how will the dogs travel safely, will they take out professional insurance that covers themselves or their liability.

If there have been serious concerns raised then I think an alternative arrangement should be examined, potentially licensing dog walkers and having them display their license number at all times on themselves and their method of transport. This would hopefully bring under control any rogue walkers who do not provide a professional service and give members of the public a way to raise issues.

I am writing to strongly protest against the proposed Public Spaces Protection Order that will make it an offence to be in charge of more than 4 dogs per person in a public place.

My wife and I own a lovely dog, and I am extremely concerned about the costs this will impose on our dog walker, who is excellent and always in control of the dogs that they walk. People need to work, and it is only reasonable that we should be able to employ a dog walker during the day without the council unfairly legislating on our private business.

I accept that we need to protect our public spaces, but Bromley is London's largest borough and to impose this restriction on such a massive portion of public space is unfair. I could understand it applying for example on certain signposted fenced off urban parks, but Bromley has many extremely rural areas in which dogs can safely be exercised without disturbing other residents. It seems an extreme abuse of power to impose this restriction borough wide, as opposed to merely reserving the right to set specific prohibitions on specific parks on a case by case basis.

I am shocked that Bromley Council sees this consultation and potential law change as a worthwhile use of its time, when there are so many more pressing challenges on the borough's streets with homelessness, drunkenness and economic problems.

I am also concerned about the process for the consultation. There is no mention of the proposed law change on the borough's own website: (https://www.bromley.gov.uk/info/200089/street_care_and_cleaning/242/responsible_dog_owners_hip), and although some parks did feature posters advertising the proposed law change, there are many parts of Bromley public space in which this notice would not have been visible which would be affected by the changes. The Council should step back from such a draconian rule change, or should at the very least accept that its consultation process has been seriously flawed without adequate consultation or communication to the stakeholders about why the proposal is necessary.

A posting on the 'Next Door' website has made me aware of the proposed introduction to make it an offence to walk more than 4 dogs at a time. I have a really poor copy of the letter so forgive me if I'm not 100% correct in my terminology. I understand that responses are due by January 20th.

As a responsible dog owner, I employ a dog walker 2 days a week to help me out. He is a lovely young man, a responsible dog walker who has set up a proper dog walking business and I am proud to be one of his customers. I would be aghast to think that his business will be affected detrimentally by these changes.

I would implore you to make these proposals more widely known in order that everyone has a fair chance to respond to this so that you are all fully aware of the feelings of residents.

I own a dog and use licensed dog walkers registered in Bromley both for walking my dog as well as day care. I have used these 3 services for 8 years since my dog was a puppy. I carried out careful research to ensure that I was using only reputable dog walkers, fully licensed, knowledgeable and trustworthy.

It has been brought to my attention that there is a proposal to limit the number of dogs walked per person in a public place to 4 dogs. Whilst I appreciate that there will always be some individuals who walk too many dogs and those same people may be unwilling or unable to control them, likewise

banning everyone from walking more than 4 dogs is hugely unfair to those of who are excellent, caring, law abiding and responsible. It is akin to using a sledgehammer to crack a nut.

All of the dog walking services I use are small businesses in the borough provide an important, responsible, professional service. I understand that the insurance payable by these businesses allows up to 6 dogs and therefore see no reason to limit the number of dogs in our parks.

If this proposal goes ahead, then it could put many out of business as it may no longer be viable for them to continue. There are only so many daylight hours to walk and so if the dogs being walked are reduced, it is impossible for the extra walks to take place and so the dog walkers will lose critical income.

And therefore as a dog owner who relies on professional dog caring businesses in Bromley, I firmly oppose this unnecessary restriction and would ask you to strongly review and reconsider.

I am writing with regard to the proposed change in the number of dogs allowed to be walked by one person from six to four within the Bromley borough.

I believe my own dog walker has already written to you outlining her concerns regarding this change and I would like to echo these concerns on her behalf. I don't know if you own a dog, but for the majority of dog owners, they are part of the family and therefore it is extremely important to find somebody trustworthy and professional to care for your dog. It can take some time to find the right person.

This change would impact many dog owners, whose dogs have already bonded with their dog walker. As my dog walker has stated, she would potentially need to let some of her clients go in order to keep her business running, meaning that some owners would need to start the process again of finding someone they can trust, whilst their dog would very much miss their walks with someone they know and trust. Clearly, this change would also affect her business and many others like her, and cause personal upset to owners and dog walkers alike.

The reasons for this change appear to be regarding complaints about dog walkers congregating with large numbers of dogs in parks. I have come across my dog walker and colleagues of hers in the park several times and she is never standing idly chatting whilst the dogs in her charge run around out of control. Responsible dog walkers are in control of their dogs and focused on them the entire time. Perhaps the few dog walkers who are acting unprofessionally should be approached separately, rather than issuing this new rule which will not change the behaviour of irresponsible dog owners/walkers but will certainly have a negative impact on many small businesses and dog owners.

I am writing about the new four dog rule Bromley council is proposing.

This rule if introduced would have a hugely detrimental effect on dog walkers and owners who depend on those dog walkers. If dog walkers are only allowed to take four they will have to let owners down as they simply won't be able to fit everyone in. There are many people who rely on daycare, boarding and walks for their dogs.

Most importantly it seems to me that it is not the amount of dogs being walked that is of concern but the walkers or owners ability to keep the dogs in their care under control and walk responsibly, and this is an entirely different matter. It is unfair to penalise good dog walkers who do a brilliant job.

I am writing to oppose the proposal from Bromley Council to implement a borough rule that the maximum size of a group of dogs being walked will be 4.

I depend on using a professional dog walker to support my work. He is very capable in controlling 6 dogs and in fact I feel the issue is not the number of dogs walked but the professionalism of the walker. There are many irresponsible people walking less dogs so it's possible that licensing individuals could be a much better solution.

My dog walker and many like him who understand dogs and provide excellent care will lose business and struggle to continue if the number of dogs permitted to be walked at one time is reduced.

I hope you are able to consider my opinion in your consultation.

I walk my dog a few times a day in different parks in the Bromley area, so am familiar with many dog walkers and the number and behaviour of dogs they are walking. I have only ever come across two who do not seem to have reasonable control of the dogs they are walking - both have been in Jubilee. One is a local walker who always walks with another walker and they have a number of small dogs bothering others. Another is a walker who comes from another Borough because of newly introduced limits on the number of dogs they are allowed to walk at once in other Boroughs. All the other dog walkers I meet have good control of the dogs they are walking - and also clean up after them. There are plenty of dog owners who do not have good control of their own dogs and plenty of others who do not clean up after their own dogs. I'm concerned that LBB's proposals create unnecessary underlying tensions between those using public spaces, where people are monitoring, chastising and vilifying others without cause. There have been extreme ramblings on social media as a result of this consultation. My view is that as long as dogs are under control a specific cap on numbers is a little arbitrary. I meet owners who have 5 well-behaved dogs of their own, so the introduction of a cap would mean them walking only some of their dogs at once. I also encounter an owner of 5 spaniels - and they are all a nuisance and behave aggressively chasing my dog (but they don't bite). It comes down to how they are trained and controlled. Ultimately, there are already laws in place to address out of control dogs, so it may make sense to rely on those and perhaps put signs up on park notice boards reminding members of the public of these and what they can do to report owners with out of control dogs, rather than confuse by also introducing local policies?

Meantime, I've had a few unpleasant conversations with cyclists in areas where they are not allowed to cycle and one told me he was allowed to cycle across Jubilee because he had spoken to the Council who informed him that although it was 'not allowed', this was not enforceable. The new gate on Southborough Lane has made it even easier for him to access and leave a Jubilee each day. I would be interested to see whether measures will be taken to address existing regulations before introducing new ones - whether this is regarding control of dogs, cleaning up after dogs, putting all litter in bins, cycling where it is not permitted, or residents with gardens backing on to public parks dumping rubbish in public parks - otherwise I'm not sure any new measures carry due weight to be effective.

On the matter of the new gate to Jubilee, on Southborough Lane, I expect you have received feedback about it already. I do hope LBB didn't have to pay for it, as although I appreciate it is trying to look natural and rustic; it is not of good workmanship and is unlikely to last long. It's also not clear its purpose if it is supposed to be a barrier as my dog ran straight back through it (because the gate scared him - don't ask!) and I just got him to stop before he ran into the road. However, the main issue is that the latch is too high as well as being in the inside of the gate and is very difficult to operate, especially with any aches and pains. The floor level is also all uneven in the same spot where you try to reach and open the latch, making it all very challenging.

I'm an ordinary member of the public who walks our dog at Crystal Palace Park (CPP) regularly throughout the week, usually for around 1.5 to 2 hours between 9.00 and 12.00 but also at other times of day on some occasions. I know and talk with a number of professional dog walkers. Also, for up to two days a week and for longer holiday periods I leave my dog with a dog walker who

regularly walks at CPP as well as at other places.

I've been visiting the park with my dog regularly for well over 10 years. During all that time I have never experienced any difficulty with any of the dog walkers or heard any member of the public or park staff complain of any actions by dog walkers or their dogs. I've only experienced difficulties in the park on a very few occasions. These all related to different members of the public who were walking their own dog (or two dogs) at the park, when either they didn't seem to be fully in control of their dog or the dog(s) appeared likely to be aggressive. I saw a few of these myself and on a few other occasions I was warned and given a description by dog walkers to beware of a particular person / dog(s) who had been seen in the park.

I do not agree with the proposal to restrict dog walkers to having a maximum of 4 dogs with them. My main reasons are:

- I have never seen a dog walker at CPP who was not in reasonable control of their dogs so there is no need for the new restriction
- I can understand the Council wanting to impose some limitations on the number of dogs being walked if there really are a lot more dogs being walked in the park. However, I understand dog walkers have insurance for up to 6 dogs and I think it is much more fair and reasonable to allow them to walk 6 dogs at a time.
- I think it is unfairly harsh on dog walkers to limit them to less than 6 dogs per walk. They are trying to earn a reasonable living, like the rest of us, and are providing a service to people like me. I don't want them having to work much longer hours, cut walks short or having to charge exorbitant prices due to an extremely restrictive new protection order when I seriously query its necessity.
- A fairer alternative to the 4 dog rule would be to place a restriction on the number of dogs which can be off lead at any one time e.g. perhaps restrict dog walkers to 4 dogs off lead plus 2 dogs on lead.
- The Council's proposed protection order does not address the only real problem I'm aware of i.e. anyone having a dog which is dangerous or out of control. Problems are much more likely to be due to a member of the public with inadequate animal management skills than to any of the professional dog walkers I have met.
- In general, it seems to me, the focus has changed and more people nowadays have a small or medium sized dog. That's the type of dog I generally see with professional dog walkers. It does seem incredibly restrictive and unnecessarily punitive if the Council is saying a dog walker cannot control 6 small / medium sized dogs. Also, people who rely on dog walkers to look after their dog are generally responsible dog owners whose dogs are more likely to be easy to control (and the dogs benefit from the socialization of being with other dogs.) So, basically the Council is penalizing responsible dog owners, because imposing this new protection order will definitely make it much more difficult for a professional dog walker to survive. Is that really what the Council is trying to do?
- The professional dog walkers appear to me to be a responsible and helpful community and the Council should be supporting them, not penalising them (and ordinary dog owners like myself who rely on their services).

I would also like to point out that it's taken quite a lot of effort on my part to find out about the Council's proposals and consultation (by asking one of the dog walkers after I'd heard a rumour about the possible new protection orders.) I haven't seen any notices in the park, certainly not at any of the car parks I've visited or at the café. There doesn't seem to be anything on the Council's website or it's somewhere really obscure. It appears that the Council has not made much effort to be fair in this matter by displaying notices prominently so that people can send in a response. I do wonder if the Council is trying to sneak this change in and whether a challenge at the Administrative Court would be appropriate.

I regularly use Crystal Palace Park to walk my dog and another park user has just told me about the

council's proposal to prohibit people from walking more than four dogs at once.

I would have responded earlier if I had known about the consultation but it seems that there has only been one notice posted in the park and this is on a gate at a side of the park that I don't use. It is a pity that the consultation was not publicised more widely so that you could get the views of a greater number of park users, particularly those of us who visit the park frequently.

I understand the council's desire to ensure that dog walkers in the park are fully in control of the dogs they are responsible for but I am not aware of any dog walkers who behave in an irresponsible or inconsiderate way. Indeed if a dog is lost, or if someone has had an encounter with an owner with an aggressive or out of control dogs, it is often dog walkers who alert other park users and the park staff.

I have been walking my own dogs in Crystal Palace Park for over 20 years. From talking to dog walkers in the park I know that most of them are registered to look after 6 dogs and so they have been able to walk this number of dogs at the same time. This seems a reasonable number to walk at one time as long as the dogs are properly controlled and do not make a nuisance of themselves. I have not been aware of dog walkers having more than 6 dogs in their pack and I have never encountered a dog walker who does not have their dogs under control or who does not pick up after the dogs they are responsible for.

My own dog goes to a dog minder for 2 days each week and I know that the proposed change would make it very difficult for my dog minder to continue to make a reasonable living as a dog walker. She is registered and insured to have 6 dogs in her care and regularly takes 6 dogs out for two long walks a day, three of these are her own dogs all of whom she has rescued, so this means she is limited to having 3 dogs boarding with her either for the day or longer periods. At the moment she is able to take all 6 dogs out for two long walks a day, probably 1-2 hours each time.

In addition to the dogs she has in her own home she also separately collects other dogs from their own homes to take them directly to the park for a daily walk and then straight back to their homes so she is generally walking for at least 6 hours a day with additional time needed for collecting and returning dogs to their own homes. If she has to walk her own dogs and the day care dogs in two groups she will have to reduce the time she takes each group out for, (so providing a less good service to her clients), or reduce the number of additional dogs she walks separately which will then reduce her income. This might well mean she cannot earn enough for her and her family to live on.

As a community we all benefit from responsible and registered dog walkers who are regularly visited and inspected. Walking regularly with an established group of dogs leaves my dog both well exercised and well socialised. A well looked after and well exercised dog is much more likely to be happy and confident, and less likely to feel threatened or frightened by unknown people or dogs.

In choosing a dog walker for my dog I talked to other owners and asked for recommendations. My dog walker required me to walk my dog with her other dog charges a couple of times before she agreed to take my dog on. This was so that she could be certain my dog would fit in with her group and would obey her commands. This seems to be common practice amongst the dog walkers in Crystal Palace, and demonstrates a sensible and responsible approach.

I fear that restricting dog walkers to 4 dogs will mean that many dog walkers are forced to seek more remunerative work. This could lead some owners to turn to unregistered and less responsible dog walkers who will flout the regulations and walk larger numbers of dogs at a time to maximise their profits. Dogs walked in very large groups are less likely to be fully under control and much more likely to pose a danger or inconvenience to other park users.

Most of the dog walkers I see in the park are walking small or medium sized dogs, a reflection of the fact that smaller dogs are now much more popular than large ones. Professional and experienced dog walkers should be well able to control and manage 6 dogs of this size. If the Council wants to

place a limit on the number of dogs one person can walk at a time I think it would be much more sensible to set this limit at 6 so that the professional dog walkers who currently use the park on a regular basis can continue to do so and to run their small businesses.

As an additional precaution if it felt the need to do so the Council could say that of the 6 dogs a walker was allowed to have with them 2 had to be on a lead. This would allow the dog walkers to still walk the number of dogs they are registered for, and they could rotate the dogs on the lead so that they all got a reasonable amount of exercise, and the walker would not need to schedule extra walks. Personally I don't think this extra measure is necessary but it would both meet the Council's requirements and protect the livelihood of local dog walkers many of whom have been using the park for many years without causing any problems for other users.

I do not believe that a blanket ban of being in charge of more than 4 dogs should be applied. Surely the main issue is dogs not being under control - even if this is just one dog under a person's charge. Therefore, the number of dogs under the charge of a walker, in my opinion, is irrelevant (as long as they are under control) and as such imposing this ban will have little or no effect on the perceived problem.

This would also severely impact the many professional dog walkers in the borough (including my own) who provide a vital service to your residents. My own dog walker is thoroughly professional and is insured to walk up to 6 dogs with the owner's consent.

Please note that I fully support and abide by the council's existing dog control policies and actually wish they were better enforced (I am always picking up other dog's excrement!).

I am responding to your consultation regarding the "Proposed additional offence in relation to the control of dogs on public land in the borough".

I object to the introduction of this offence and the increase in the fixed penalty charges for the following reasons.

1. The information regarding the concerns raised from various groups is made only in general terms, therefore it is impossible for anyone responding to your consultation to discern whether this is a localised problem or a wider issue. Certainly in my 30 yrs plus of using predominantly my local park and less frequently Beckenham Recreation Ground, Crystal Palace, Norman Park, Keston Ponds and other public areas, I have never had a problem with people walking more than 4 dogs. In contrast they have had full regard for the animals in their charge and have in my personal experience only allowed 4 or less off the lead at one time. The number of dogs is not the real issue; the control is the primary concern. The current 4 offences cover any lack of control exhibited by anyone in charge of 1 or more dogs.

2. The fact that concerns have been raised is undoubtedly due to the lack of any authorised officers being present to resolve the problem. An extra offence will not solve this. Likewise neither will increasing the fixed penalty.

3. I have exercised a dog of my own and one owned by a friend with dogs in the charge of a dog walker some off the lead some on. Realistically would an authorised officer be able to tell how many dogs were in the charge of each person in these circumstances? Would he/she take the time to find out? If there were no cause for concern i.e. no other offence committed would he /she need to intervene?

4. I would actively encourage any person who is prepared to act responsibly to use my local park and to become a friend of this space, I include responsible dog walkers whether they have 1 or 6

dogs.

Our public spaces do require users to negotiate and compromise with each other and that is an important lesson for all age groups and those taking part in any activity in these spaces. Sadly people don't learn these skills at home anymore, no one has to negotiate over TV programmes or meals, you can have what you want in your own space. This does lead people to complain or act as if they have the overwhelming right in a public space. No public order offence or fixed penalty will have any effect unless there is someone to deliver on them. We therefore need more authorised persons to enforce the adequate offences we have in place.

Thank you for forwarding this message. Unfortunately as this was the first time I had heard about the proposal I haven't been able to respond before the 20th January deadline.

The opportunity to comment does not seem to have been adequately publicised as I have had several comments from dog walkers in the park that they have not heard about the consultation.

As someone who is a dog owner and also an event organiser in Crystal Palace Park I feel that the proposal is misguided and will not result in significant improvement in the perceived nuisance of dogs. Throughout all the events that I have organised the worst dog related incident was a dog that was being walked individually, peeing on a stall.

Perceived risks from dogs have been significant, from my non dog owning or park going colleagues, but regular park users such as schools that I have worked with or event organisers are better informed and realise the risk is minimal.

The existing measures in place should be sufficient to manage any issues. Dog owners or walkers with more than 4 dogs should not be penalised en masse because of lack of resources to enforce existing measures.

On the whole dog walkers are responsible custodians of green space. Why not harness the dog walking community in a positive way

https://www.ourwatch.org.uk/uploads/pub_res/Dog_Watch.pdf

Poor management of dogs in public space is as much of a problem for dog walkers as any other park users but rather than demonising an entire group why not tackle those actually causing a problem.

I also only heard about this today via social media.

I can say 100% that any negative experiences I have had with dogs in parks - with or without my own dogs - have been irresponsible owners with 1 or 2 dogs and not professional dogs walkers. In my view this policy is very damaging.

Responsible ownership needs to be applied to actions and not numbers.

I am writing to you to oppose the introduction of the new offence proposed by Bromley Council: Being in charge of more than 4 dogs in a public place.

I hope this objection has made it to you in time as I understand the deadline is today.

I am a dog owner and I use the services of a dog walker who sometimes walks the dogs she has in her care in Bromley.

She carries full insurance that covers her walking up to 6 dogs. She carries full public liability, has been DBS checked and carries any other insurances she needs to cover her and the dogs. These were all things we made sure she had before choosing her to look after our dog. She also came highly recommend to us by other dog walkers. When we first started to use the services of our dog walker our dog had to pass a trial to ensure that she got on with the other dogs in the dog walkers care, she had good recall and was well behaved. We also had to fill out detailed paperwork about our dog and had a couple of meetings with the walker before she took our dog on.

I have also had the pleasure of joining my dog walker on a couple of her walks where she has had multiple dogs with her (always within the limits depending on where we are walking). She was

always aware of what the dogs were doing, had them under control and picked up all the poo's they did. I have also met other dog walkers whilst walking my dog and the majority of them are responsible professionals who follow the rules, and have control of the dogs in their care. I have rarely witnessed a dog walker who has more dogs in their care than the rules allow, doesn't pick up mess or doesn't have the dogs under control.

It is deeply worrying and saddening that the rules for the amount of dogs a person can be in charge of in the borough is changing. If the changes go ahead it is highly likely to impact me financially as well as potentially force me to look for another dog walker. My dog has such a strong bond with my dog walker that it would be a really disappointing to have to use the services of someone else. I also can't begin to imagine how difficult it's going to be for hardworking responsible individuals like my dog walker who will be impacted significantly by the changes. They will find they will have to turn clients away ultimately losing income.

I feel this change has been a knee jerk reaction to a small number of complaints and once implemented will not be properly enforced as in Lewisham. The small number of dog walkers who aren't acting responsibly (because unfortunately there are some) by picking up mess, having control of their dogs or have more dogs than the limit in the borough they will continue to act as they currently do. Meaning that the problem/complaints that the borough is currently having will continue and responsible dog walkers will continue to get a bad reputation.

There has been a suggestion for getting dog walkers to apply for permits, which would be charged for, allowing them to walk 6 dogs in the borough. I feel that this would be a much better solution to the problem as this would allow the council extra funding to employ dog wardens to enforce the dog limits, fine anyone they fine not picking up dog mess or who is over the limit/doesn't have a permit and help discourage things like dog thefts which can happen on walks. It also means that the council can go and vet the dog walkers to make sure that they are responsible and in control. This permit would also be a sign to dog owners that they walker that they use or choose to use in the future can be trusted and will reassure the public that Bromley's parks are dog friendly, cleaner due to less dog mess and safe to visit. I realise that this option is a lot more work and will cost more money than simply changing the limit, however it is by far the better option for everyone. It is also worth noting that DEFRA, The RSPCA and The Dogs Trust all agree that 6 is an acceptable number of dogs for professional dog walkers to be responsible for.

I implore you to consider my arguments and endorsements so that the community as a whole can benefit from any changes Bromley Council seek to implement.

It has been brought to my attention that Bromley council intends to impose a limit of 4 dogs per dog-walker. Whilst, as a dog-owner, I would welcome some kind of licensing in this area, I am concerned that this limit would cripple many small businesses and make it even harder to find a reliable dog-boarder/walker.

In addition, I would be interested to know if you have consulted with any local dog-walkers about this proposal? I am led to understand that in contrast, dog walkers' insurance covers 6 dogs, DEFRA guidelines favour 6 as the upper limit and the RSPCA and Dogs Trust guidance for dog walkers is also a 6 dog limit.

Undetermined (3)

Can you clarify for me please, who would be the authorising officer, Ward Security or any Idverde staff? I am assuming all the correct signage necessary is in place including maps showing what areas in Biggin Hill the PSPO order covers?

The other thought, rather than fine anybody with more than 4 dogs, can you not send a message to all dog walking companies, they must register with Bromley Council and to pay an annual sum to allow them to use Bromley parks and open spaces. Obviously signage, using social media, libraries etc. to promote this action, but could become a useful income generator.

Failing to pick up after your dog has fouled

- Failing to put your dog on a lead when directed to do so by an authorised officer

- Allowing your dog into a no dog / exclusion area.

- Allowing your dog off lead in a dog on lead area.

The additional offence being consulted on and to have effect by introducing a new order is:

- Being in charge of more than 4 dogs per person in a public place

We propose to increase the fixed penalty offence from £80 to £100 for all

I would suggest one additional penalty offence - that of slinging plastic dog-poo bags into the bushes.

As someone who spends considerable time picking up litter in Keston and Hayes Common, the amount of plastic poo bags collected is increasing and is very unpleasant to remove.

It may well already be an offence under the Littering Bylaws, but it can't hurt to add to this update.

Perhaps as well as the penalty notices, Bromley could also post more light-hearted signs that may get through to some people's consciences (example poster in email)

Having seen your notice on a tree in Jubilee Park and having looked at the Bromley Council website I cannot see any information regarding PSPO's and would ask you to confirm if this an initial advance notice of the proposal to introduce PSPO's in the borough.

There is no evidence of anti-social behaviour involving dogs and creating PSPO's have a detrimental effect on the community and I would like to have the opportunity to work with the council to promote responsible dog walking / behaviour without the need for PSPO's.

I would very much like the opportunity to discuss this with you at some time in the near future.

List of site applicable to the PSPO.

All carriageways, adjoining footpaths and verges in the London Borough of Bromley.
All pedestrian areas.

All car parks and public vehicle parking areas maintained by the London Borough of Bromley.

All alleys, public walks, passageways, bridleways and rights of way that are not in private ownership within the London Borough of Bromley.

Equipped playgrounds

Alexandra Recreation Ground, Alexandra Road, Penge SE20

Betts Park, Croydon Road, Penge SE20

Biggin Hill Recreation Ground, Church Road, Biggin Hill

Blake Recreation Ground, Pine Avenue, West Wickham

Burham Close Play Area, Burham Close, Penge SE20

Cator Park, Aldersmead Road, Beckenham

Charterhouse Green, Charterhouse Road, Orpington

Chelsfield Open Space, Skibbs Lane, Chelsfield

Chislehurst Recreation Ground, Empress Drive, Chislehurst

Church House Gardens Recreation Ground, Church Road, Bromley

Churchfields Recreation Ground, Playground Close, Elmers End

Coney Hall Recreation Ground, Addington Road, West Wickham

Crease Park, Village Way, Beckenham

Croydon Road Recreation Ground, Croydon Road, Beckenham

Crystal Palace Park, Thicket Road, Penge SE20

Cudham Lane North Recreation Ground, Cudham Lane North, Green Street Green

Cudham Lane South Recreation Ground, Cudham Lane South, Cudham

Downe Recreation Ground, High Elms Road, Downe

Edgebury Open Space, Imperial Way, Chislehurst

Eldred Drive Playground, Eldred Drive, St Mary Cray

Elmers End Recreation Ground, Shirley Crescent, Elmers End

Farnborough Hill Open Space, High Street, Farnborough

Farnborough Recreation Ground, Starts Hill, Locksbottom

Glentrammon Recreation Ground, Windsor Drive, Chelsfield

Goddington Park Lower, Berrylands, Orpington

Goddington Park Upper, Goddington Lane (East), Chelsfield

Grassmead Recreation Ground, Dyke Drive, St Mary Cray

Harvington Estate, Eden Park Road, West Wickham

Hoblingwell Wood, Leasons Way, St Pauls Cray

Hollydale Recreation Ground, Lakeside Drive, Keston

Husseywell Open Space, Pickhurst Lane, Hayes

Kelsey Park, Wickham Road, Beckenham

Kings Meadow Open Space, Burnt Ash Lane, Plaistow

Kings Road Park, Kings Road, Biggin Hill

Leamington Avenue Open Space, Southfleet Road, Orpington

Martins Hill, Recreation Road, Shortlands

McAndrews Recreation Ground, Corkscrew Hill, West Wickham

Mottingham Sports Ground, Grove Park Road, Mottingham SE9

Newbury Road Play Area, Bromley

Norman Park, Hayes Lane, Bromley

Oaklands School Play Area, Norheads Lane, Biggin Hill
Old Hill, Green Street Green, Cudham Lane Nrth, Green St Green
Palace Square, Pleydell Avenue, Anerley SE19
Parkfield Recreation Ground, Whitebeam Avenue, Southborough
Penge Recreation Ground, High Street, Penge, SE20
Petts Wood Recreation Ground, Eynsford Close, Petts Wood
Pickhurst Recreation Ground, Pickhurst Lane, Hayes
Poverest Park, Footbury Hill Rd, Orpington
Pratts Bottom Open Space, Rushmore Hill, Pratts Bottom
Pratts Bottom Recreation Ground, Broke Farm Drive, Pratts Bottom
Priory Gardens, High Street, Orpington
Ramsden Play Area, Whichling Close, Orpington
Ravensbourne Open Space, Lakes Road, Keston
Richmal Crompton Park, Lower Gravel Road, Bromley
Sandway Park, Sandway, St Mary Cray
Shaftesbury Park, Valeswood Road, Downham
Southborough Open Space, Oxhawth Crescent, Bromley
St Mary Cray Recreation Ground, Park Road, St Mary Cray
St Pauls Cray Recreation Ground, Main Road, St Pauls Cray
Tillingbourne Green, Orpington
Tubbenden Lane Open Space, Tubbenden Lane, Orpington
Turpington Lane Open Space, Rayfield Close, Bromley
Wharton Road Play Area, Bromley
Whitehall Recreation Ground, Blenheim Road, Bromley
Widmore Recreation Ground, Widmore Road, Bromley
Willett Recreation Ground, Crossway, Petts Wood

Unequipped playgrounds

Beckenham Green, St Georges Road, Beckenham
Jubilee Park, Thornet Wood, Petts Wood
Riverside Gardens, High Street, St Mary Cray

Sports facilities enclosure sites

Alexandra Recreation Ground, Alexandra Road, Penge SE20
Arundel Drive Open Space, Arundel Drive, Chelsfield
Betts Park, Croydon Road, Penge SE20
Biggin Hill Recreation Ground, Church road, Biggin Hill
Blake Recreation Ground, Pine Avenue, West Wickham
Chislehurst Recreation Ground, Empress Drive, Chislehurst
Church House Gardens, Church Road, Bromley
Churchfields Recreation Ground, Playground Close, Elmers End
Coney Hall Recreation Ground, Addington Road, West Wickham
Croydon Road Recreation Ground, Croydon Road, Beckenham
Cudham Lane South Recreation Ground, Cudham Lane South, Cudham
Farnborough Recreation Ground, Stats Hill, Locksbottom
Gentrammon Recreation Ground, Windsor Drive, Chelsfield
Goddington Park, Goddington Lane (East), Orpington
Hoblingwell Wood, Leesons Way, St Pauls Cray
Mottingham Sports Ground, Grove Park Road, Mottingham
Norman Park, Hayes Lane, Bromley
Penge Recreation Ground, High Street, Penge, SE20

Poverest Park, Footbury Hill Road, Orpington

Sandway Park, Sandway Road, St. Mary Cray
Sparrows Den, Corkscrew Hill, West Wickham
St Mary Cray Recreation Ground, Park Road, St Mary Cray
Stanhope Recreation Ground, Stanhope Grove, Penge
Walsingham Linear Park, Chipperfield Road, St Pauls Cray
Widmore Recreation Ground, Widmore Road, Bromley
Willett Recreation Ground, Crossway, Petts Wood

Paddling pools

Alexandra Recreation Ground, Alexandra Road, Penge, SE20
Church House Gardens, Church Road, Bromley
Croydon Road Recreation Ground, Croydon Road, Beckenham
Riverside Gardens, High Street, St Mary Cray

Boating pond

Church House Gardens Recreation Ground, Church Road, Bromley
Riverside Gardens, Kent Road, St Mary Cray

Recreation grounds (complete area)

Queens Gardens, Kentish Way, Bromley

Recreation grounds (restricted areas)

Alexandra Recreation Ground, Alexandra Road, Penge SE20
Church House Gardens Recreation Ground, Church Road, Bromley
Jubilee Park, Thornet Wood, Petts Wood
Kelsey Park Recreation Ground, Stone Park Avenue, Beckenham
Kings Meadow Open Space, Burnt Ash Lane, Plaistow
Penge Recreation Ground, High Street, Penge, SE20
Priory Gardens, High Street, Orpington
Whitehall Recreation Ground, Blenheim Road, Bromley
Widmore Recreation Ground, Widmore Road, Bromley

Recreation grounds

Scadbury Park, Chislehurst

Recreation grounds (restricted areas)

High Elms Wood (Beeche Centre), High Elms Road, Farnborough

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London Borough of Bromley

PART ONE - PUBLIC

Decision Maker: ENVIRONMENT & COMMUNITY SERVICES PORTFOLIO HOLDER

For Pre-Decision Scrutiny by the Environment & Community Services PDS Committee on:

Date: Tuesday 17 March 2020

Decision Type: Non-Urgent Executive Key

Title: DRAFT AIR QUALITY ACTION PLAN

Contact Officer: Joanne Stowell, Assistant Director of Public Protection
Tel: 020 8313 4332 E-mail: Joanne.Stowell@bromley.gov.uk

Chief Officer: Colin Brand, Director of Environment and Public Protection

Ward: (All Wards);

1. Reason for report

This report seeks agreement to undertake public consultation on the draft Air Quality Action Plan (AQAP) 2020-25 “the draft plan”.

The draft plan contains revisions including a proposed extension of the current Air Quality Management Area (AQMA) which was declared in 2007(Appendix A). The proposed extension incorporates those areas where the annual mean of the London air quality objective for nitrogen dioxide, (NO₂) is exceeded.

The draft plan (Appendix B) also incorporates the Greater London Authority (GLA) derived air quality matrix; this contains the 25 actions points for boroughs to consider delivering locally as part of their London Local Air Quality Management action planning obligations (Appendix C).

The draft plan will replace the current plan which was adopted in 2010, and the revisions have been made in accordance with the London Local Air Quality Management Technical Guidance 2019 (LLAQM TG 19), that supports London boroughs in carrying out their duties under the Environment Act 1995 and connected regulations.

RECOMMENDATION(S)

The Portfolio holder is asked to:

1. Agree that the revised Air Quality Management Area, as set out in the report and detailed at Appendix A, be approved.

2. Agree that the Draft Air Quality Action Plan 2020 - 2025 (Appendix B) be approved for a 2 stage consultation process as set out at paragraph 3.31.
3. Receive feedback following the full consultation at the next meeting on 9th September 2020
4. Agree that the Director of Environment and Public Protection, in consultation with the Portfolio Holder for Environment, approve any minor changes required to the Action Plan arising from the GLA's approval process.
5. Approve the final version of the AQAP for adoption by Executive on 16th September 2020

Impact on Vulnerable Adults and Children

1. Summary of Impact: Poor air quality contributes to shortening life expectancy and disproportionately impacts on the most vulnerable population, in particular the young and elderly. The aim of the plan is to put measures in place to improve the health and wellbeing of everyone living and working in Bromley.
-

Corporate Policy

1. Policy Status: Existing Policy:
 2. BBB Priority: Children and Young People Excellent Council Quality Environment Safe Bromley Vibrant, Thriving Town Centres Healthy Bromley Regeneration:
-

Financial

1. Cost of proposal: Not Applicable:
 2. Ongoing costs: Not Applicable:
 3. Budget head/performance centre: Environmental Protection
 4. Total current budget for this head: £185k
 5. Source of funding: Revenue budget 2019/20
-

Personnel

1. Number of staff (current and additional): Not Applicable
 2. If from existing staff resources, number of staff hours: Not Applicable
-

Legal

1. Legal Requirement: Statutory Requirement
 2. Call-in: Applicable
-

Procurement

1. Summary of Procurement Implications:
-

Customer Impact

1. Estimated number of users/beneficiaries (current and projected): Borough Wide
-

Ward Councillor Views

1. Have Ward Councillors been asked for comments? Not Applicable
2. Summary of Ward Councillors comments: Not Applicable

3.0 COMMENTARY

The Framework

- 3.1 As part of the UK National Air Quality Strategy, the Environment Act 1995 requires Local Authorities to declare Air Quality Management Areas at locations where air quality does not meet the Air Quality Objective (AQO) limits for certain pollutants.
- 3.2 In 2016 the Mayor of London introduced the London Local Air Quality Management system for London (LLAQM). Although the statutory framework outlined by National Air Quality regulations and Part IV of the Environment Act remains, the London specific local air quality management policy and technical guidance has been refined to reflect the unique challenges, and opportunities, faced by local authorities in London. All boroughs are now required to work in accordance with this new guidance.

The AQOs:

- 3.3 The table within Appendix A presents the AQOs that London Local Authorities need to achieve. Benzene, 1,3-Butadiene, Carbon Monoxide, Lead and Sulphur Dioxide remain in the regulations, however the limits for these pollutants have been met by Bromley for several years; and these pollutants are no longer reported on. As such, the relevant pollutants that remain for Bromley are: Nitrogen Dioxide (NO₂), and Particulate Matter (PM₁₀ and PM_{2.5}).
- 3.4 Air quality data is usually presented in one of two ways:
- As an annualised figure – this reflects the average concentrations of a particular pollutant (at a particular monitoring point, or through modelled data), or
 - As the number of hours in a year that pollution levels were above a particular level (at a particular monitoring point, or through modelled data).
- 3.5 The objectives within Appendix A contain limits that should be met for both the average annual exposure, together with daily (24hr) and hourly exposure.

Air Quality in Bromley

- 3.6 According to modelled data from: the Department for Environment Food and Rural Affairs (DEFRA), the GLA and the LAEI, Bromley is the least polluted of all London boroughs for annual average levels of PM_{2.5} and NO₂. Additionally, it has no schools exposed to annual average NO₂ concentrations above the limit stipulated in the AQO. Whilst the GLA modelled data also shows that emissions of NO₂ have reduced since 2010, the annual average concentrations of this pollutant remain a concern for the borough; the actions set out within the matrix will deliver to further reductions of NO₂, and are proportionate given the local context.

The Existing Air Quality Management Area (AQMA)

- 3.7 Bromley has met all of the AQO's other than the annual mean objective for the pollutant NO₂. It is a statutory requirement that an AQMA be declared for areas where air quality does not meet the AQO limits for certain pollutants, as a result, one AQMA was declared in 2007 in the north west of the borough due to exceedances of the annual mean for NO₂ (see Appendix A).

The Proposed AQMA

- 3.8 As required by the LLAQM, from 2020 onwards, local monitoring and mapping provided by the GLA must be utilised to review whether any declared AQMAs should be revised. This review was undertaken, and whilst modelled data from the GLA shows an overall decline in the

annual average concentrations for NO₂ since 2010, the data supported an extension to the AQMA. The updated pollution maps within the draft plan clearly demonstrate that the areas of highest pollution are attributable to the strategic and major road networks including the A20 and A21, and it is proposed that the current AQMA be extended across the north of the borough (the top two thirds). The map of the current and proposed AQMA boundaries is shown in Appendix A.

The Air Quality Focus Areas (AQFA)

3.9 The GLA has identified specific AQFAs throughout London, the Focus Areas are described as areas where the risk of exceeding pollution limits is high, there is relevant public exposure and where local authorities are expected to prioritise improvement actions for those emissions which are under their direct control. In Bromley there are two such areas, these being:

- Tweedy Rd A21/High St/Widmore Rd A222
- Croydon Road between Elmers End Green and Croydon Rd.

The Draft Air Quality Action Plan (AQAP) “the plan”

3.10 Where an Air Quality Management Area has been declared local authorities must have a consulted and approved AQAP to reduce the relevant atmospheric pollutant/s within that area so that at some point in the future, the area will meet the national air quality objective limits.

3.11 This draft plan attached at Appendix B, replaces the current action plan that was adopted in 2010; it has been developed in recognition of the legal requirement on the Local Authority to work towards air quality objectives under Part IV of the Environment Act 1995, and relevant regulations made under that part. It meets the requirements of the LLAQM statutory process, by which boroughs are required to monitor, assess and take actions to tackle pollution, supports the extension of the AQMA, and demonstrates the borough’s work towards reducing emissions and concentrations of PM2.5 as now required.

The Broad Themes and the Priorities of the Draft AQAP

3.12 In 2019 there was a revision to the LLAQM air quality matrix; it now contains 25 actions that boroughs are expected to deliver locally as part of their LLAQM action planning. The actions are spread across 7 broad themes; however, as three of these themes are transport related, Bromley’s draft AQAP has combined these three elements and split its commitments across five themes, these being:

1. Monitoring and other core statutory duties;
2. Reducing emissions from developments and buildings;
3. Public health and awareness raising;
4. Reducing emissions from Transport (including, deliveries, servicing, freight and fleet actions); and
5. Localised Solutions.

3.13 In addition to the 25 action points as provided within the air quality matrix, Bromley has also included additional locally appropriate measures. All locally derived actions within the matrix have a letter after their number. The action plan will be included in the final AQAP, but is appended separately at this point (See Appendix C).

The Format of the AQAP

- 3.14 The draft plan is split into two key parts, the first provides the Bromley context; it summarises the key pollutants of concern, describes the health impacts of pollution, provides a summary of air quality in London as a whole, then provides a closer look at pollution in Bromley.
- 3.15 Although NO₂ is the main pollutant in Bromley that exceeds legislative limits (annual mean), the health impacts resultant of the inhalation of fine particulate matter (PM_{2.5}) is also addressed within the draft plan. The latest GLA policy requirements have introduced a specific duty for London Boroughs to work towards reducing both emissions and concentrations of PM_{2.5} where this is possible.
- 3.16 The second part of the AQAP is the action plan itself, this comprises of the five broad themes together with the air quality matrix, which contains all the actions the council aim to take to meet our statutory requirements and to reduce levels of all pollutants as far as reasonably practicable within the local context.

The Air Quality Matrix

- 3.17 Within the Air Quality Matrix it lists:

- The action number
- The action name
- The description of the action
- The evidence to support to delivery of the action
- The responsibility and
- The magnitude of benefits (high 3 (borough wide), medium 2 (neighbourhood), low 1 (localised))

Consultation and Next Steps

- 3.18 If the extension of the AQMA is agreed, the boundary will be formally changed following the LLAQM prescribed process.
- 3.19 In formulating the draft AQAP, internal stakeholders have already been consulted and their contributions have been incorporated. Following approval of the draft AQAP, Schedule 11 of the Environment Act 1995 requires that local authorities undertake a consultation. The Mayor of London is the key statutory consultee, and will need to approve final AQAP prior to publication. In addition, Schedule 11 requires boroughs to consult the following:
- The Secretary of State;
 - The Environment Agency;
 - Transport for London (who will provide a joint response with the Mayor);
 - all neighbouring boroughs and/or neighbouring district and county councils;
 - other public authorities as the borough considers appropriate;
 - bodies representing local business interests and other persons/ organisations as considered appropriate.
- 3.20 The consultation will be carried out in 2 stages: the first stage being with the statutory consultees as prescribed in 3.19; this will run for 4 weeks. Once the first stage has completed, responses will be analysed and any appropriate amendments will be made. The amended

draft plan will then be released for the second stage for public consultation. This stage will also run for 4 weeks; the standard communications approach will be used, together with a survey to be published online. Following the conclusion of this stage, the feedback will be considered and the final amendments to the plan will be incorporated as appropriate. At this stage the draft plan must be resubmitted to the GLA for checks and approval before it is approved by the committee or published. Once the approved plan is received, it will be presented to the E&CS PDS for recommendation for adoption by the Executive.

3.21 Timetable:

Stage 1: Consultation with Statutory Consultees - 4 weeks	23rd March – 20th April 2020
Collate responses and Amend as Appropriate	20th April – 6th May 2020
Stage 2: Public Consultation – 4 weeks	7th May – 4th June 2020
Collate responses and Produce Final Plan	5th June – 19th June 2020
Send to GLA for final approval	22nd June 2020
Environment E&CS PDS Presentation of Final AQAP	9th September 2020
Adoption of Policy – Executive	16th September 2020

4.0 IMPACT ON VULNERABLE ADULTS AND CHILDREN

4.1 Summary of Impact: Poor air quality contributes to shortening life expectancy and disproportionately impacts on the most vulnerable population, in particular the young and elderly. The aim of the plan is to put measures in place to improve air quality and improve the health and wellbeing of everyone living and working in Bromley.

5. FINANCIAL IMPLICATIONS

5.1 Work associated with producing the AQAP is undertaken by officers within existing budgets and there are no direct additional costs as a result.

5.2 The actions within the AQAP will be taken forward through existing Council work streams within existing resources and commitments, these include: planning development, Section 106 agreements, town centre improvements, Council office upgrades, fleet replacement, contract requirements, partnership work, regulation and enforcement regimes. Where the actions required to secure air quality improvements are transport-related, funding from via the LIP3 (2019-2022) allocation from Transport for London will be utilised where available and as appropriate. Bidding opportunities to secure funding for other further improvements will be sought throughout the timescale of the Plan, such as the Mayor's Air Quality Fund, Liveable Neighbourhoods bids and others where applicable.

6. LEGAL IMPLICATIONS

6.1 The Council is under a statutory duty to monitor air quality under part IV of the Environment Act 1995. Further legal implications are set out within the body of the report.

Non-Applicable Sections:	PERSONNEL IMPLICATIONS, POLICY IMPLICATIONS, PROCUREMENT IMPLICATIONS
Background Documents: (Access via Contact Officer)	Air Quality Action Plan 2010



Bromley Council
Air Quality
Action Plan
2020-2025



THE LONDON BOROUGH
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Acronyms and Abbreviations



AQAP	Quality Action Plan
AQFA	Air Quality Focus Area
AQMA	Air Quality Management Area
AQO	Air Quality Objective
BEB	Buildings Emission Benchmark
CAB	Cleaner Air Borough
CAZ	Central Activity Zone
EV	Electric Vehicle
GLA	Greater London Authority
LAEI	London Atmospheric Emissions Inventory
LAQM	Local Air Quality Management
LLAQM	London Local Air Quality Management
NO₂	Nitrogen Dioxide
NO_x	Oxides of Nitrogen
NRMM	Non-Road Mobile Machinery
PM₁₀	Particulate matter less than 10 micron in diameter
PM_{2.5}	Particulate matter less than 2.5 micron in diameter
TEB	Transport Emissions Benchmark
TfL	Transport for London
ULEZ	Ultra Low Emission Zone

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<i>7</i>	<i>Key Pollutants of Relevance to Bromley</i>
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Foreword

I am pleased to endorse Bromley's revised draft Air Quality Action Plan 2020-2025.

Bromley is the largest borough geographically and the 6th largest by population in London, with 327,500 residents who call Bromley their home.



With that in mind, this action plan highlights existing measures as well as new initiatives; both of which demonstrate the Borough's commitment to tackling poor Air Quality. The measures presented further contribute to the 'clean and safe borough' ambition within our borough plan 2020-25, and is one of the priorities within Bromley's Transformation Agenda, that of a quality environment and healthy Bromley.

This plan demonstrates the intended actions against the 25 measures stipulated in the latest GLA 2019 matrix, which are proportionate within the local context.

It gives clear actions and anticipated targets for delivery, and demonstrates the joined up and holistic approach we will take. However, the arena surrounding air quality is moving at a fast pace, as such, the actions we take as a borough will not necessarily be restricted to those listed in the matrix. We will scan the horizon for the opportunities that present themselves resultant of new technology, advancements in research or new funding streams, and we will consider how these can be applied for the benefit of Bromley residents as they arise.

Within this plan, Bromley recognises the need to work with external partners and stakeholders collaboratively, to reduce pollution in the areas of the borough where levels exceed the national air quality objectives. This is important as the main contributing factors that affect us locally, such pollution from our strategic and major road networks, are not directly within our control. Finally, whilst we meet the national objectives for PM 2.5, we intend on using the measures within this plan to reduce the levels from this pollutant further, with the aim of meeting the enhanced WHO target in the future.

Cllr Huntington-Thresher Portfolio Holder for Environment & Communities

"Bromley is the greenest and least polluted of all London Boroughs"

We are proud to be the greenest and the least polluted of all London boroughs, with 7,000 acres of green space, over 100,000 planted trees and around 560 hectares of woodland. Having said this, we recognise that the good work already undertaken must be built upon, to ensure we maintain and improve our air quality for our residents.

Responsibilities and Commitment

This draft Air Quality Action Plan (AQAP) has been produced as part of our statutory duties as an Air Quality Management Area, as required by the Greater London Authority (GLA) under the London Local Air Quality Management (LLAQM) statutory process.

This draft Plan contains all the actions we will take to improve air quality in Bromley between 2020 and 2025.



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In accordance with the LLAQM, progress against the plan will be detailed in Annual Status Reports and available to download from Bromley Council's website.

This document has been formulated by the Environmental Protection team at the London Borough of Bromley with the support and agreement of the following officers and departments.

- **Ade Adetoseye OBE** Chief Executive
- **Dr Nada Lemic** Director Public Health
- **Colin Brand** Director Environment & Public Protection
- **Joanne Stowell** Assistant Director Public Protection
- **Peter McCready** Assistant Director Environment
- **Angus Culverwell** Assistant Director Traffic and Parking
- **Gillian Fiumicelli** Head of Vascular Disease Prevention Programme
- **Sarah Foster** Head of Performance Environment and Public Protection
- **Jake Hamilton** Head of Development and Planning
- **Charlotte Hennessy** Environmental Protection, and PRS Housing Manager
- **Paul Chilton** Transport Operations Manager
- **Hugh Chapman** Arboriculture Manager
- **Amy Harris** Waste Strategy Manager
- **Lee Gullick** Carbon Programme Manager
- **George Brown** Environmental Programme Officer
- **Rachel Sadler** Environmental Protection Officer
- **Katie Ryde** Planning Strategy

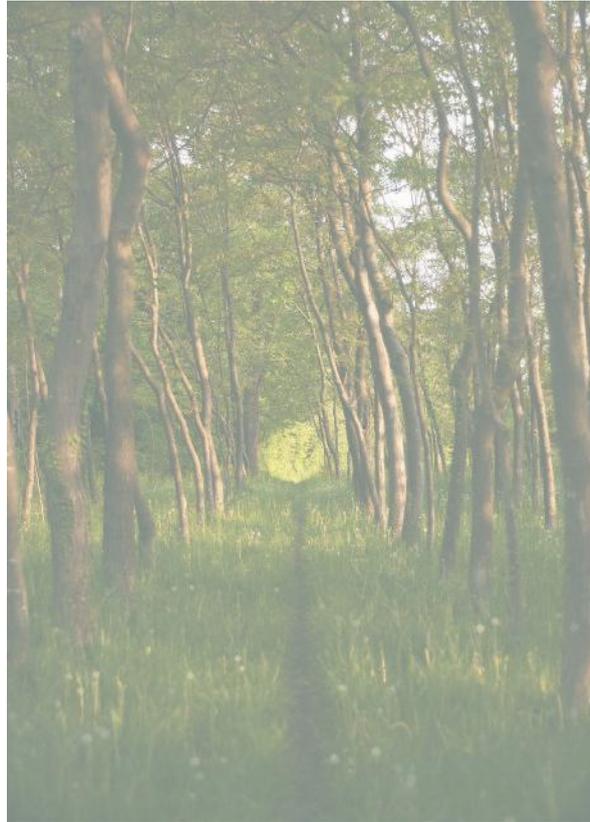
"According to the latest LAEI, Bromley has the lowest percentage of population exposed to NO2 levels above the legal limit"



Summary

This draft Air Quality Action Plan (AQAP) has been produced as part of the Council’s duty to London Local Air Quality Management. It outlines the action we will take to improve air quality in the London Borough of Bromley from 2020-2025, and replaces the previous action plan which ran from 2010 to 2020.

Whilst certain modelled data shows that Bromley may be the greenest and least polluted of all London Boroughs, we know that poor air quality is associated with a number of adverse health impacts; it is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions.



The annual health costs to society of the impacts of air pollution in the UK are estimated to be roughly £15 billion, and the London Borough of Bromley is committed to reducing the exposure of people in Bromley to poor air quality in order to improve health.

The AQAP has been split into 2 sections. The first section provides the background for Bromley’s actions on air pollution, including general explanations of what air pollution is and the associated health effects.

This section also summarises the AQMA and the AQFAs, as well as the key pollutants of concern for Bromley. It provides the overall picture for London, and takes a closer look of pollution in Bromley: where pollution is, where it comes from, and the trends in pollution levels across the borough over time.

The second section of this draft AQAP is the action plan itself; it presents the required themes as required by the GLA. However, whilst the GLA has 7 themes, we have condensed these down to 5, as the 3 categories that relate to transport have been grouped together. The 5 themes are: **monitoring, reducing emissions from buildings and new development, reducing emissions from transport (including freight/servicing and fleet), public health & raising awareness and local solutions.**

The GLA within their matrix presented 25 action points under the above theme headings, and we aim to deliver proportionate actions against all points to meet our statutory requirements. Working in partnership, we have presented additional actions beyond the initial 25 points, and are committed to reduce levels of all pollutants as far as is practicable within the local context. This is an important point to make, as Air Quality is something we cannot tackle alone. Pollution travels across borough, national and international boundaries, and many of the factors contributing to pollution in Bromley may be beyond our control (e.g transboundary pollution). Moreover, the main areas in our borough that experience exceedances are along our busy 'A' roads, the majority of which are the responsibility of TfL. This being the case, we will continue to work with and lobby regional and central government on policies and issues beyond Bromley’s control, whilst tackling action in those areas within our sphere of influence.

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What is Air Pollution?

Air pollution is a combination of solid particles and noxious gases that are emitted into the atmosphere. Some of these emissions occur naturally, and some as a result of human activity, but both can have a negative effect on human health. Human derived pollution is mostly associated with the combustion of fossil fuels such as coal, oil, petrol or diesel. Examples of natural pollution include the smoke resultant of forest fires and the production of methane from animals.

01 The main pollutants

The main pollutants of concern are carbon monoxide, nitrogen dioxide, ground level ozone, and particulate matter (small dust particles made up of a variety of different chemicals and metals).

02 What is the most harmful pollutant?

According to the World Health Organisation (WHO), PM 2.5 is considered to be the air pollutant which has the greatest impact on human health, as they are able to pass into the blood, and cause harm at very low levels.

03 Where does it originate from?

Pollution in Bromley comes from a variety of sources. This includes pollution from sources outside of the borough, and in the case of particulate matter, a significant proportion of this comes from outside of London and even the UK.

04 How does the weather or season impact?

Even though humans produce the pollution, the weather will determine what happens once it is released into the air. For example, when it's windy or wet pollution concentrations remain low, either removed from the air by rain or blown away. When it's hot, dry and still, pollution levels climb, and pollution episodes can occur. Concentration levels are also higher in winter, as more people rely on their heating systems.

What are the Health Effects of Poor Air Quality?

Institute for Health Metrics & Evaluation estimates that air pollution is ranked as the 10th largest risk factor for mortality and ill-health in England.



01 Health and Other Impacts

It is now well understood that poor air quality contributes to asthma and exacerbates other pre-existing respiratory conditions. It is also a factor in the onset of cancer and heart disease. As research develops, our understanding of how poor air quality can adversely influence disparate topics increases. For example, research shows it can even influence crime levels in urban areas, due to windows and doors being left open in extended periods of hot weather.

02 Short-term Exposure

Short term exposure to high levels of air pollution usually occur as a result of pollution episodes caused by the weather (see previous page point 4). These episodes can result in a range of adverse health effects, including exacerbation of respiratory conditions such as asthma and chronic respiratory disease, through to an increase in emergency admissions to hospital.

03 Long-term Exposure

The relative risk associated with long term exposure is greater than for short-term. It occurs at a lower level than for short-term and contributes to the initiation, progression and exacerbation of disease. These effects are often not noticed by people at the time the damage is being done. Additionally, it is estimated that the average reduction in UK life expectancy associated with air pollution is 6 months.

04 Who's most at risk?

Poor air quality disproportionately affects the health outcomes of the very young, the elderly, the ill and the poor.

The Air Quality Objectives

"Bromley meets all national air quality objectives for particulate matter"

The table on the right presents the Air Quality Objectives to be achieved. Benzene, 1,3-Butadiene, Carbon Monoxide, Lead and Sulphur Dioxide remain in the regulations, however the limits for these pollutants have been met for several years and are well below the national air quality objectives, as such, it is not necessary to report upon these pollutants. Therefore, the pollutants of concern for Bromley are NO2 and Particulate Matter (PM10).

Air quality data is usually presented in one of two ways: as an annualised figure, reflecting the average concentrations of a particular pollutant, or as the number of hours in a year that pollution levels were above a particular level. This data either pertains to particular monitoring points, or modelled data.



Pollutant	Objective	Averaging Period
Nitrogen dioxide (NO ₂)	200µg/m ³ not to be exceeded more than 18 times a year	1-hour mean
	40µg/m ³	Annual mean
Particulate Matter (PM ₁₀)	50µg/m ³ not to be exceeded more than 35 times a year	24-hour mean
	40µg/m ³	Annual mean
Particulate Matter (PM _{2.5})	Work towards reducing emissions/concentrations of fine particulate matter (PM _{2.5})	Annual mean
Sulphur dioxide (SO ₂)	266µg/m ³ not to be exceeded more than 35 times a year	15-minute mean
	350µg/m ³ not to be exceeded more than 24 times a year	1-hour mean
	125µg/m ³ not to be exceeded more than 3 times a year	24-hour mean
Benzene (C ₆ H ₆)	16.25µg/m ³	Running annual mean
	5µg/m ³	Annual mean
1,3-Butadiene (C ₄ H ₆)	2.25µg/m ³	Running annual mean
Carbon Monoxide (CO)	10mg/m ³	Maximum daily running 8-hour mean
Lead (Pb)	0.5µg/m ³	Annual mean
	0.25µg/m ³	Annual mean

Key pollutants of relevance to Bromley

The main atmospheric pollutants of concern in **Bromley** are Nitrogen Dioxide (NO₂) and Particulate Matter (PM) with fractions PM₁₀ (breathable) & PM_{2.5} (able to pass into blood stream).

The main source of both pollutants is traffic emissions, large scale combustion plant, construction sites and domestic heating also contribute.

Bromley Council meets all the national AQOs other than for the annual mean limit for nitrogen dioxide (NO₂). We are currently meeting the national objectives for particulate matter (PM₁₀ and PM_{2.5}) but as this pollutant is damaging to health at any level, this remains a pollutant of concern. In recognition that there is no safe exposure limit for particulate matter, this Action Plan commits to target compliance with WHO guidelines for these pollutants in the future.

✔ Nitrogen Dioxide: NO₂

All combustion processes produce oxides of nitrogen (NO_x). In London, road transport and heating systems are the main sources of these emissions. NO_x is primarily made up of two pollutants - Nitric Oxide (NO) and nitrogen dioxide (NO₂). NO₂ is of most concern due to its impact on health. However NO_x easily converts to NO₂ in the air - so to reduce concentrations of NO₂ it is essential to control emissions of NO_x.

✔ Particulate Matter: PM₁₀ and PM_{2.5}

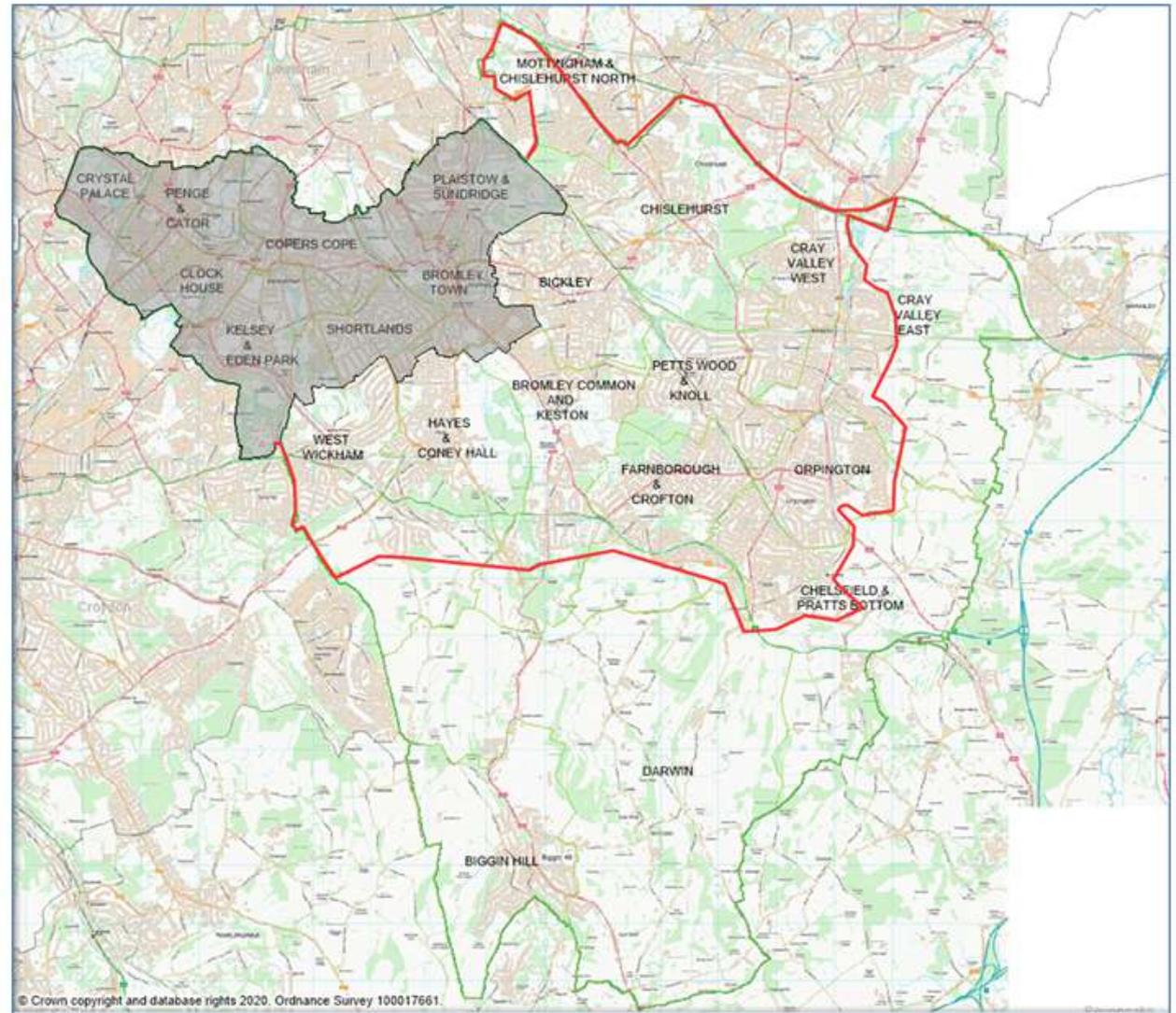
Particulate Matter (PM₁₀ and PM_{2.5}) is a complex mixture of non-gaseous particles of varied physical and chemical composition. It is categorised by the size of the particle (for example PM₁₀ are particles with a diameter of less than 10 microns (µgm)). This size of particulate is breathable. Most PM emissions in London are caused by road traffic, in Central London this is as much as 80%, with exhaust emission, tyre and brake wear and dust from road surfaces being the main sources. Construction sites, with high volumes of dust and emissions from machinery are also major sources of local PM pollution, along with accidental fires and burning of waste. However, a large proportion of PM originates outside of London, and includes particulates from natural sources, such as sea salt, forest fires and Saharan dust.

The Air Quality Management Area

"According to GLA data, No primary or secondary schools in Bromley are exposed NO2 concentrations that exceed to annual limits".

Where local authorities suspect they have levels of pollutants exceeding the National Air Quality Standards and Objectives (page 6), they are required to investigate potential exceedances with a view to implementing Air Quality Management Areas (AQMA). The declaration of an AQMA, places a statutory duty to monitor and take action to reduce levels of pollutants. Bromley declared an AQMA in 2007 (grey shaded area on the map) for the North West of the Borough. However, as required by the LLAQM, from 2020 onwards, local monitoring and mapping provided by the GLA must be utilised to assess whether an AQMA should be revised.

This exercise was undertaken, and the 2020 modelled data, despite showing a decline in exposure levels over time, still supports an extension of the AQMA; the map to the right shows shows the extended boundary highlighted in red.



Legend

Current AQMA
Proposed new boundary
Borough boundary



The Air Quality Focus Area

“Bromley meets all air quality objectives for hourly and 24 hour concentrations”

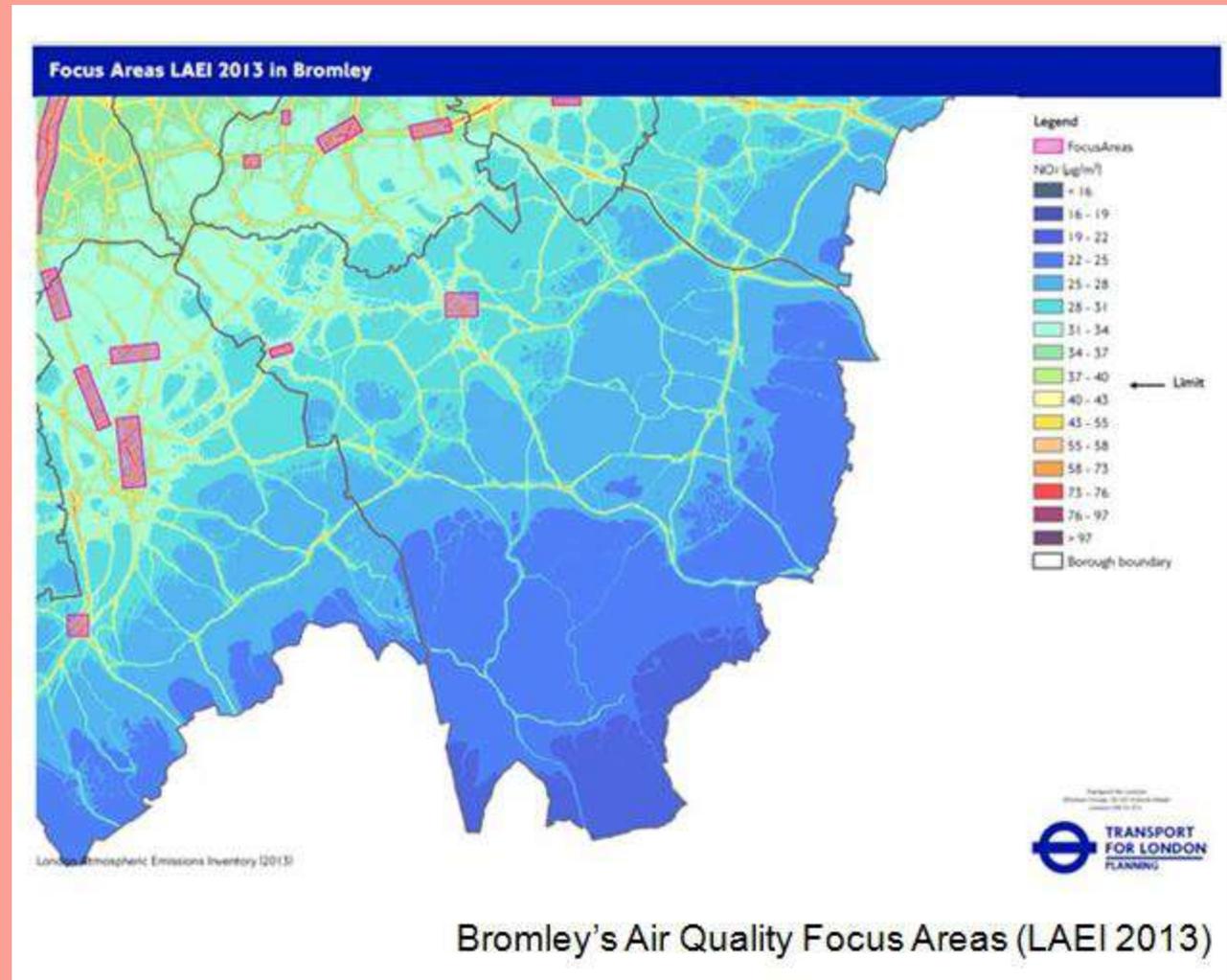
In 2016 the LLAQM introduced the concept of Air Quality Focus Areas (AQFAs) across London. The AQFAs are described as areas where the risk of exceeding pollution limits is high and there is relevant public exposure, and Local Authorities must keep these areas under review and take positive action where possible to improve them.

The Map on the right highlights the 2 AQFAs within Bromley, these are:

- Tweedy Rd A21/High St/Widmore Rd A222
- Croydon Road between Elmers End Green and Croydon Rd.

Research into available funding is being undertaken with a view to removing the gyratory system at Elmers End Green to create a new public space and improvement of the cycling and walking routes to the station/tram stop.

The Council has less control over the Bromley Town Centre AQFA as it is vehicles on the A21 that pollute, and the road is the responsibility of TfL. However, the Council will work on proposals to reduce the need to drive to the town centre, and continue to lobby TfL to use less polluting buses.



Bromley's Air Quality Focus Areas (LAEI 2013)

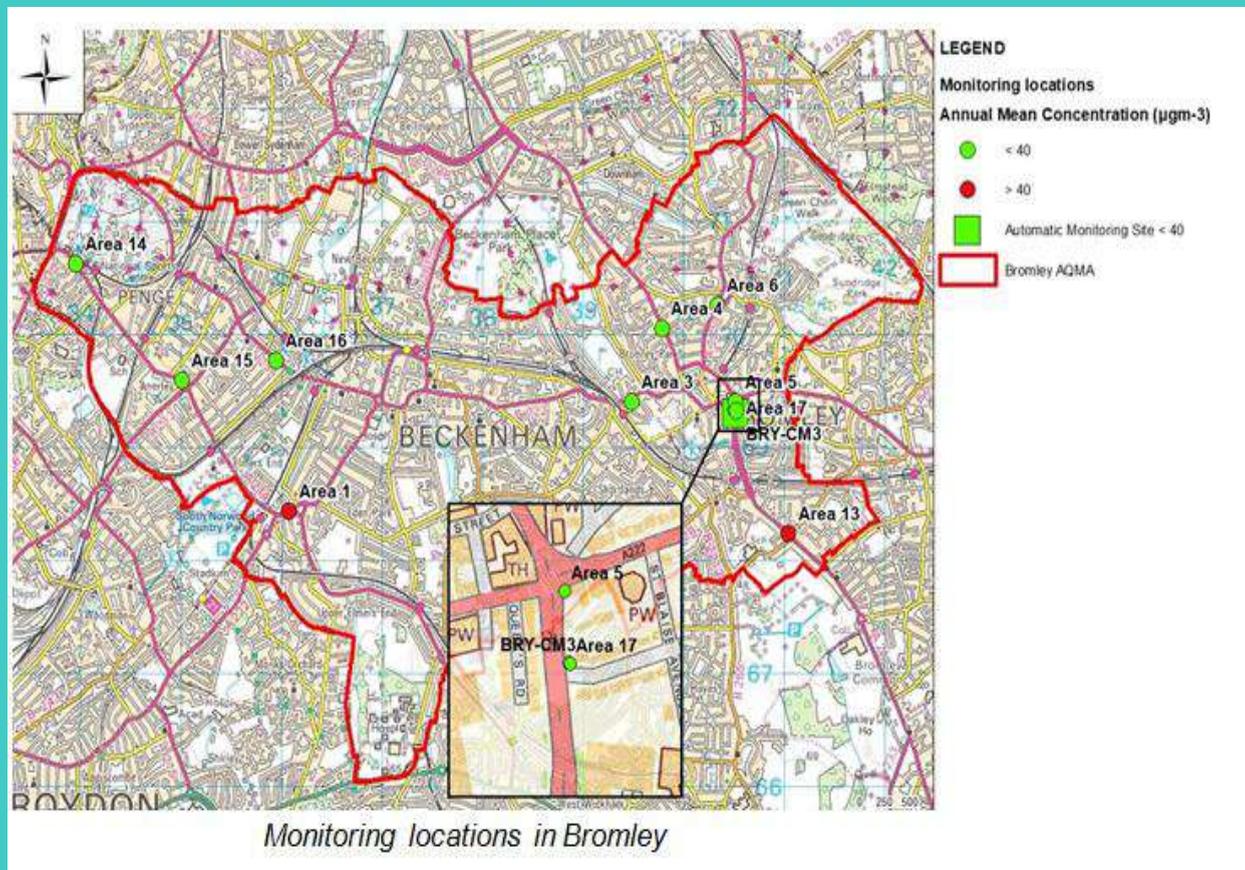
Monitoring Data

Bromley currently has ten passive monitoring sites in the borough with all sites located in the AQMA and one co-located at the air quality monitoring station in Harwood Avenue.

As well as our own data, Bromley also utilises modelled data from the London Annual Emissions Inventory (LAEI), and both data sources show annual mean exceedances of the air quality objectives for NO₂ across the borough.

The NO₂ diffusion tube locations are shown on the map. The annual mean NO₂ objective of 40µg/m³ was exceeded at two of the ten NO₂ monitoring locations in 2018. It is important to note that that this is the lowest number of annual mean NO₂ exceedances in all years since 2010.

The highest annual mean NO₂ concentration in 2018 was monitored at Elmers End Road with a value of 51.3 µg/m³ however, the the level measured at this location was the lowest since since 2011



Air Quality in London

Air quality is a major problem across all of London: all of the 33 London Local Authority areas have declared AQMAs (some borough wide), requiring them to take action to improve air quality in their local areas. Air pollution is worse in the centre of London, where there is the heaviest concentration of traffic and buildings.

The London Atmospheric Emissions Inventory (LAEI), is published by the GLA and TfL on an approximately four yearly cycle. Using a variety of source data, the latest LAEI estimates ground level concentrations of key pollutants NO_x, NO₂, PM₁₀ and PM_{2.5} across Greater London for the year 2016, using an atmospheric dispersion model. This version of the LAEI, which was published in 2019, is the most established data source for modelling air quality across London.

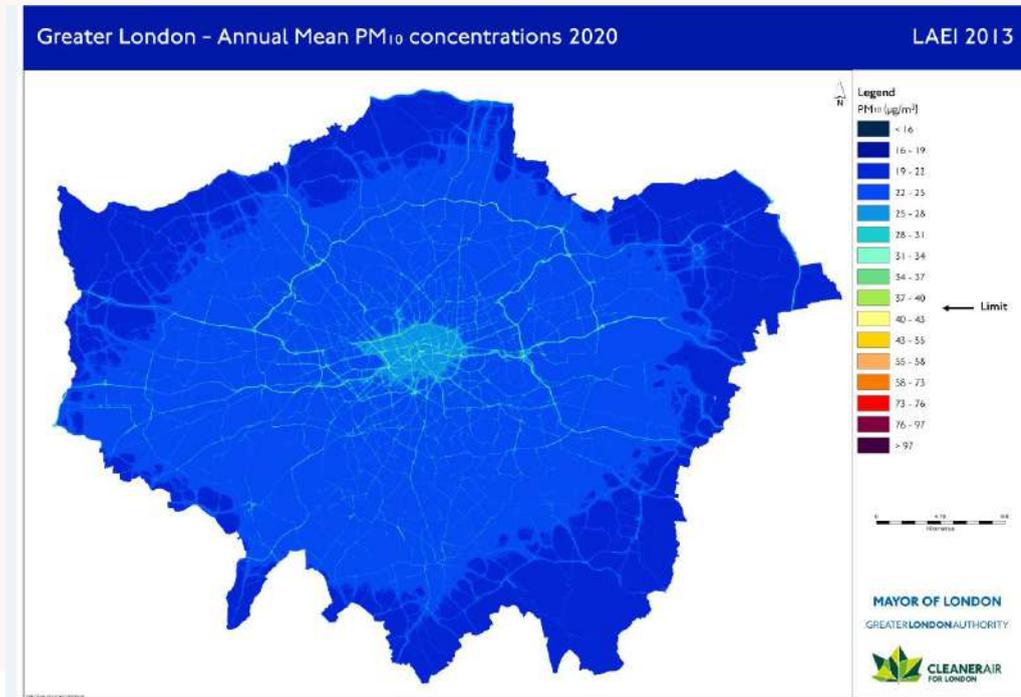
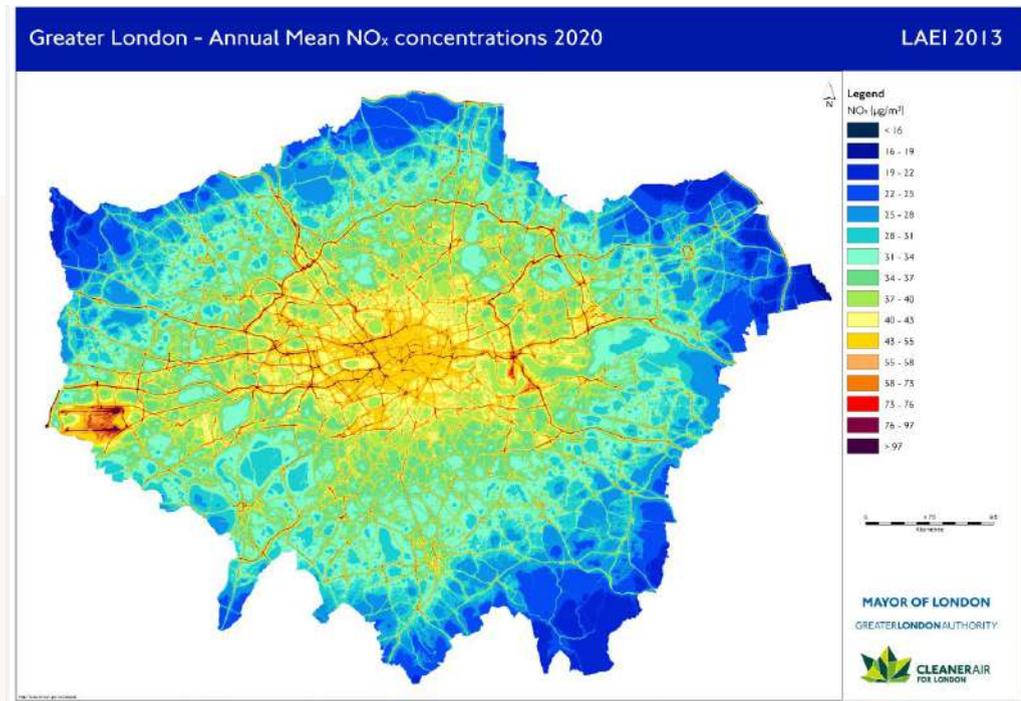
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This LAEI modelled 2020 data (published in 2019) is the most established source for modelling air quality across London.

Of the two main pollutant types of concern, in central London, NO₂ objectives are consistently breached, with exceedances in outer London tending to take place at the sides of busy roads.

The UK national annual PM₁₀ limit value is being met across London, but there are still isolated exceedances of short term PM₁₀ objectives at busy roads.

The two maps to the right show the overall picture in London for NO_x and PM₁₀. Blues and greens reflect areas in compliance with standards for these pollutants; oranges, reds and darker represent exceedances of the annual limits.



Air Quality in Bromley NO₂ and PM₁₀

The maps to the right essentially reflect 'zoomed in' versions of the London-wide maps on the previous page. These allow a greater understanding of the pollution that exists in Bromley.

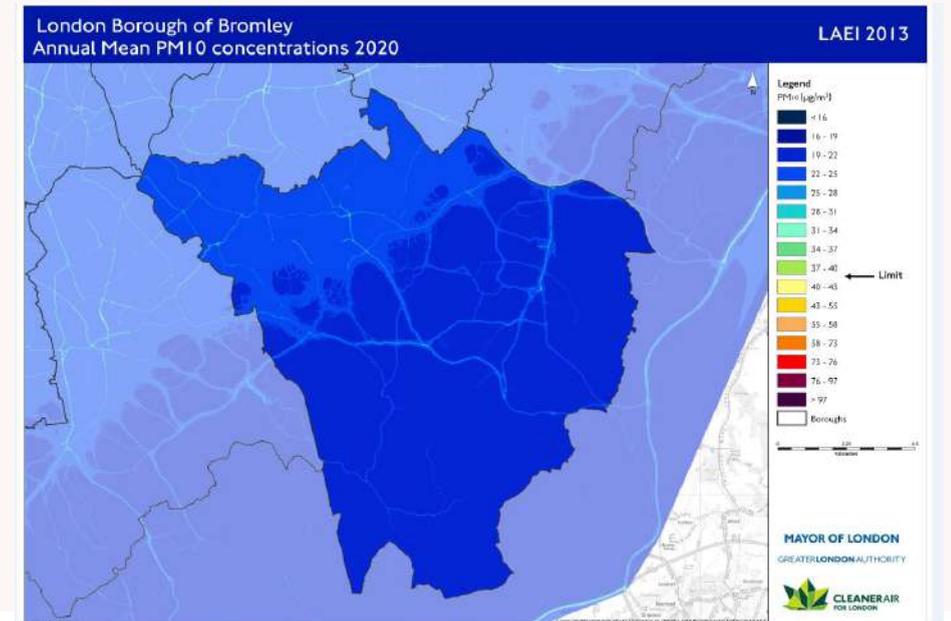
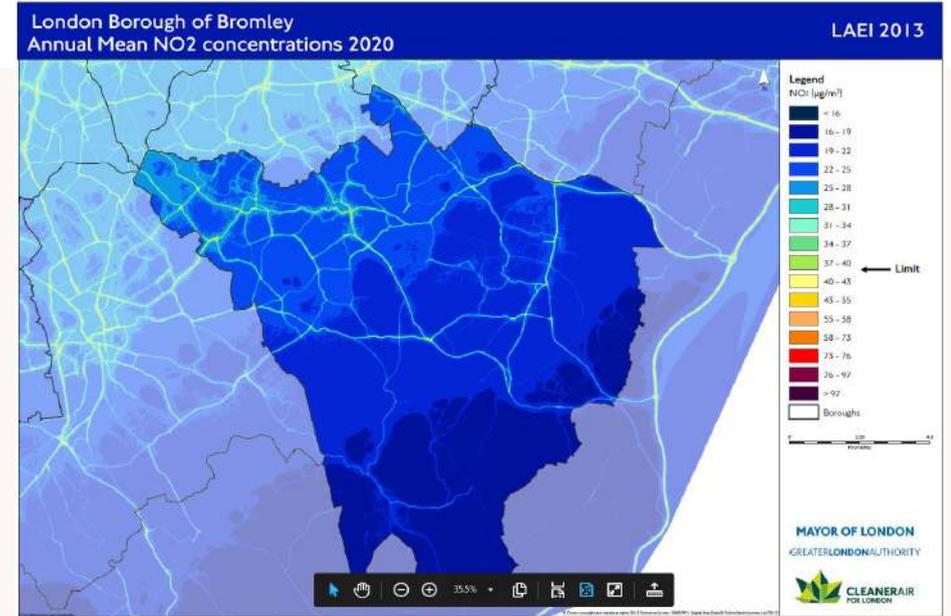
Bromley meets all the national objectives at our monitoring points other than for the annual mean of Nitrogen Dioxide (NO₂), however, the data for Bromley shows that there has been some decline in NO₂ concentrations since 2010.

As with the rest of London, the highest pollution falls alongside busy main roads such as the A21, A20 and A232. These roads are clearly distinguishable on the maps and show as light green due to their associated pollution levels.

As most of the polluting roads in Bromley are operated and managed by Transport for London, our ability to limit air pollution from these roads is limited

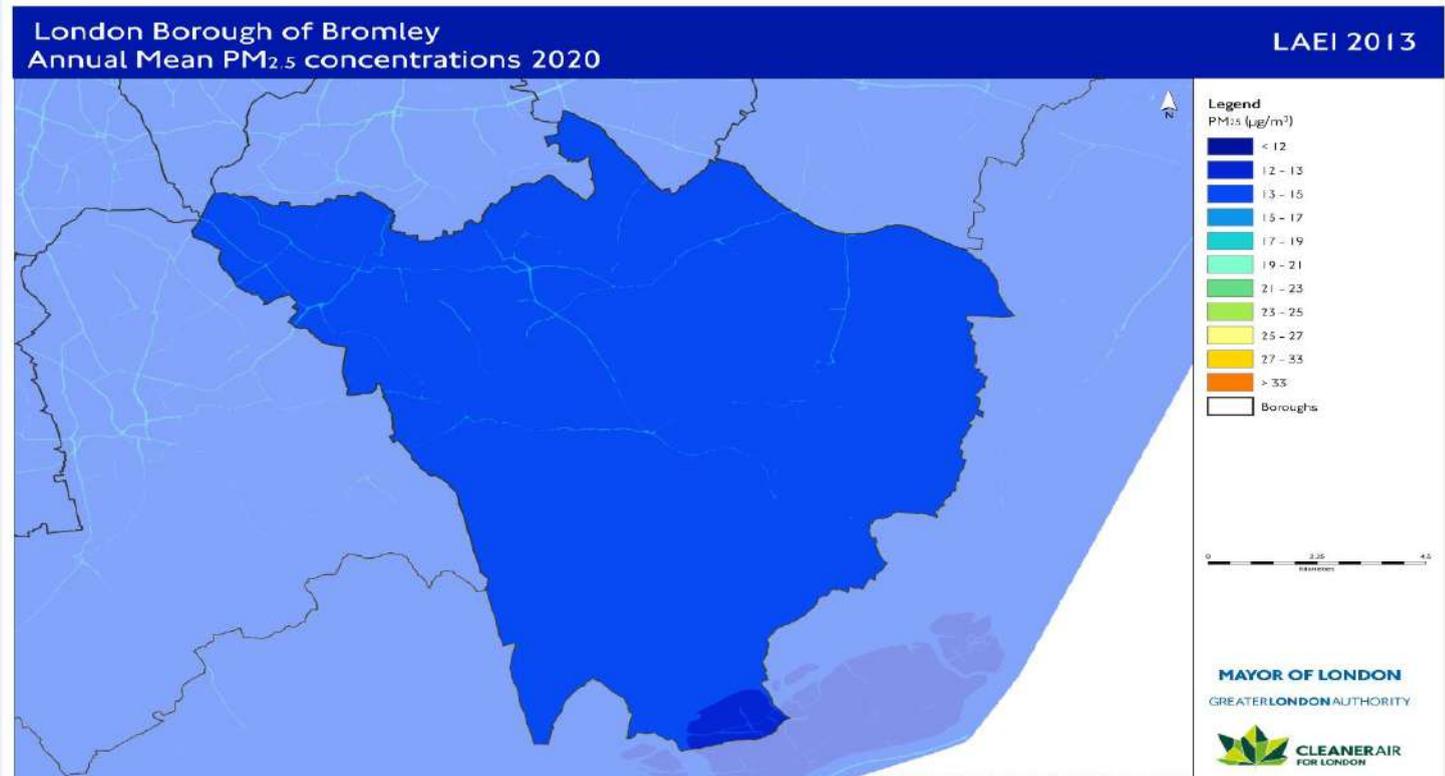
The colour changes show how the pollution gradient changes with distance, away from heavy traffic, and further demonstrates that the majority of the borough has pollution levels well below the target limit.

The Council is meeting the current objectives for Particulate Matter (PM₁₀ and PM_{2.5}), however as the pollutant PM_{2.5} is considered to be damaging to health at any level this remains a pollutant of concern.



Air Quality in Bromley PM2.5

"Data shows that Bromley has the lowest concentration levels of PM2.5 per weighted population"



As previously mentioned, Bromley is meeting the current objectives for Particulate Matter (PM10 and PM2.5), however as the pollutant PM2.5 is considered to be damaging to health at any level this remains a pollutant of concern.

The WHO annual mean guideline limit for protection of human health is considered to be 10 micrograms per cubic metre of air.

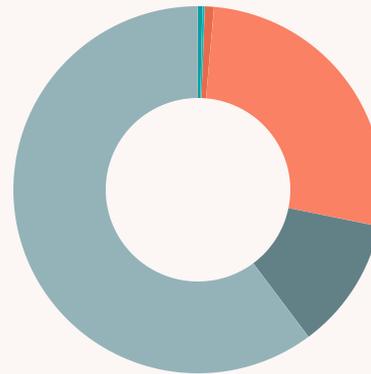
According to the 2018 modelled DEFRA data, the average concentration per weighted population in Bromley is 10.4 micrograms per cubic meter of air. This level is the lowest of the London Boroughs, and is below the maximum limits set in the Air Quality Objectives. However it is marginally above the WHO guideline, and therefore further efforts to reduce this are warranted if we are to meet this target, as is our ambition.

Source Apportionment

What are the Sources of NOx and NO2?

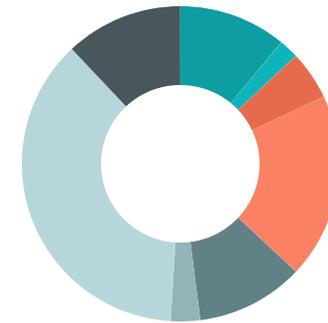
All combustion processes produce oxides of Nitrogen (NOx). In London, road transport and heating systems are the main sources of these emissions. NOx is primarily made up of two pollutants - nitric oxide (NO) and Nitrogen Dioxide (NO2).

NOx Emissions



- Rail (0.4%)
- Aviation (0.2%)
- Other (0.8%)
- Industrial and Commercial (26.8%)
- Domestic (11.6%)
- Road Traffic (60.2%)

NOx Road Transport Emissions



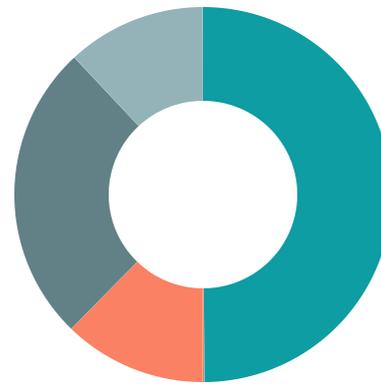
- TFL Bus (11%)
- Taxi (2%)
- Non-TFL Bus (5%)
- LGV Diesel (19%)
- HGV Rigid (11%)
- HGV Artic (3%)
- Car Diesel (37%)
- Car petrol (12%)

Of the NO2 that originates in the borough, the graph above shows that 60% of NO2 emissions comes from road transport, and the second largest source is industrial and commercial, the sources being industrial emissions, construction, domestic heating, commercial heating and cooking. With regards to transport, it's clear that the largest contributors to this are TfL buses (11%), Taxis and diesel cars (37%).

Source Apportionment

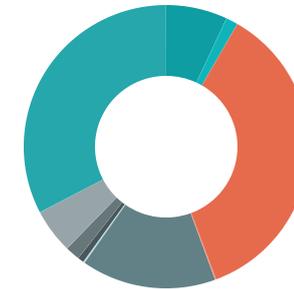
What are the Sources of PM10?

Sources of PM10 Emissions



industrial and commercial (49.88%) Rail (0.04%)
Aviation (0.13%) Domestic (12.26%)
Road Transport (25.75%) Other (11.94%)

PM10 Road Transport Emmissions



HGV Rigid (6.96%) HGV Artic (1.37%)
Car Petrol (36%) Car Electric (0.1%)
LGV Diesel (15.29%) LGV Electric (0.02%)
LGV Petrol (0.16%) Motorcycle (0.69%)
Non-TFL Buses (1.66%) TFL Buses (5.1%)
Car Diesel (32.64%)

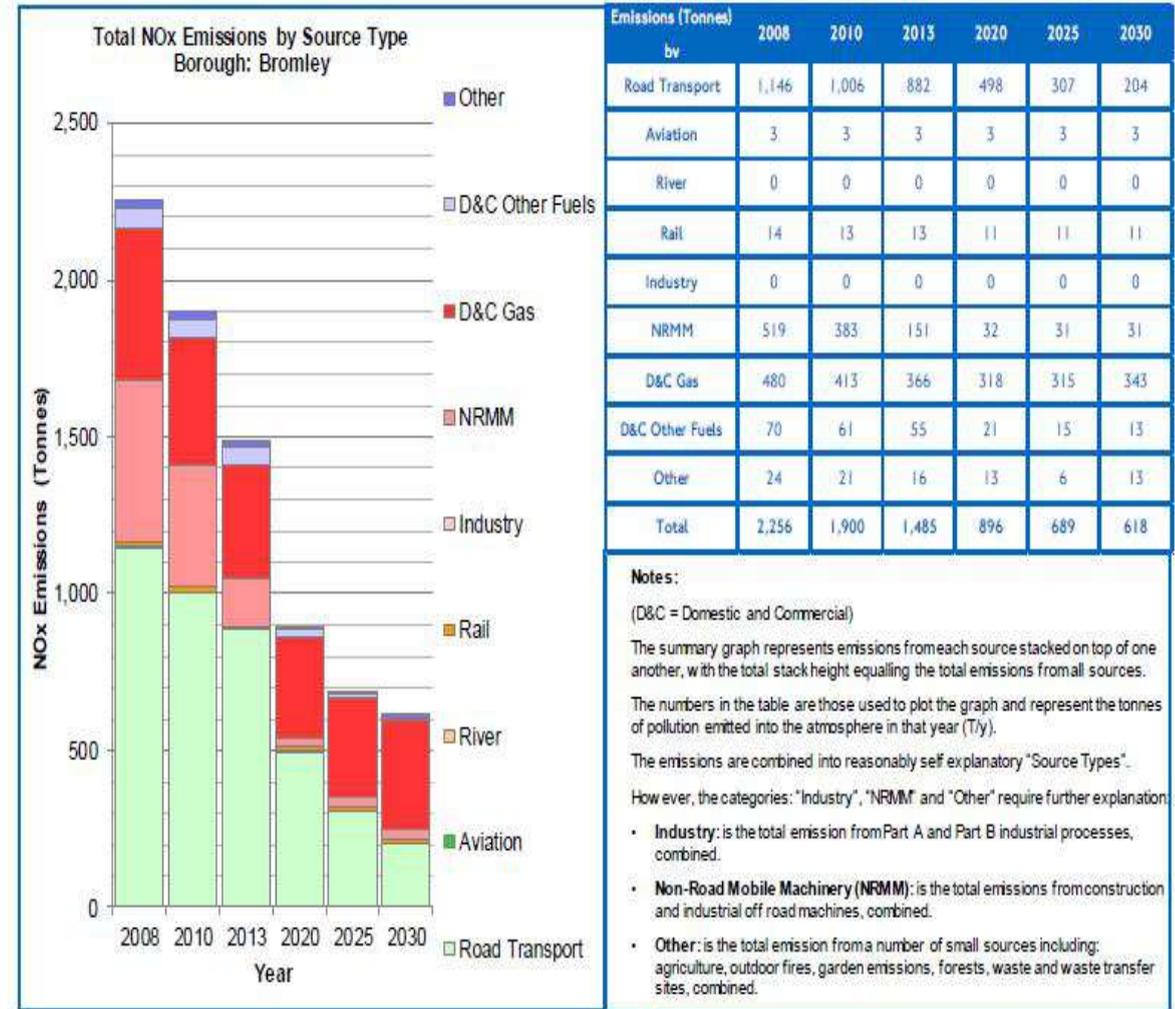
With PM 10, industrial and commercial sources contribute almost half of all emissions in this category, the single next largest polluters being diesel and petrol cars.

Future of Air Quality in Bromley

“Data shows that Bromley's air quality has improved year on year since 2010”

London Atmospheric Emissions Inventory

NOx Emissions - Bromley



The LAEI provides detailed modelling figures for future air quality levels across London. The following graphs show the modelled emissions forecast for Bromley for 2020, 2025 and 2030. A variety of inputs are included in the modelling to make these projections. For example, projections for road transport emissions are based on factors including expected uptake of electric vehicles, general technological advancement (and reduced emissions) of petrol and diesel vehicles, overall demand for private cars, and major policy developments such as the ULEZ.

The graph to the right shows that NOx levels are predicted to decrease rapidly between 2020 and 2025; reductions in road transport emissions (the green bar on the graph) constitute the largest area of emissions reduction. This is due to technological advances in transportation, an uptake of zero emission vehicles and major policy interventions such as the Mayor of London's ULEZ. The second largest source of emissions, domestic and commercial gas (the red bar), are predicted to also decrease over the same period, but to a lesser extent. As a result, moving into the 2020s domestic and commercial gas is predicted to become the largest source of emissions in the borough.

The 5 Themes of the Action Plan

Bromley's vision is to both maintain and improve the overall air quality in the borough, and to work towards achieving the PM2.5 limits set by the WHO in the future. We know we can't achieve this alone, therefore a holistic and collaborative approach will be taken with partners and stakeholders, to drive our ambitions forward.

Our Action plan has been split into 5 categories:

- Monitoring
- Reducing emissions from buildings and new development
- Public Health and Raising awareness
- Reducing emissions from transport (including, servicing, freight and fleet)
- Local Solutions

As part of their statutory LLAQM duties, the GLA produced a matrix with 25 actions for boroughs to consider delivering locally as part of their LLAQM action planning obligations, and Bromley is committed to taking forward all of these actions forward. Working in partnership, we have also presented additional actions beyond the initial 25 points, and are committed to reduce levels of all pollutants as far as we are able to.

This section is set out as follows:

- Each of the five themes is introduced, with key achievements over the lifetime of the action plan;
- The action plan matrix itself sets out all the actions grouped by the five key themes.

✓ Monitoring Air Quality: Theme 1

We will continue to monitor air quality to assess our compliance with Air Quality Limit Values, and against World Health Organisation targets.

Key actions from our Action Plan-

- We will expand our network of diffusion tube monitoring to cover the expanded AQMA;
- We will test emerging monitoring technologies including smartphone apps as they are developed;
- We will seek funding for automatic monitoring of PM10 and PM 2.5.

✓ Reducing Emissions from Buildings and New Developments: Theme 2

Emissions from demolition and construction work are key sources of particulate matter, specifically Non-road Mobile Machinery is the major culprit, and non-compliant construction plant can cause highly localised spikes in pollution. We will ensure that all planning applications for major developments are conditioned to require compliance with the NRMM, meaning that plant will be compliant with relevant emissions standards, and our new Development Plan (incorporating the London Plan) will set a more demanding requirement for certain developments.

Key actions from our Action Plan-

- We will mitigate and minimise emissions from both existing buildings and from new development using a combination of policy, partnership working, and specific projects and interventions;
- We will work towards creating a net zero emissions by 2029 for Council buildings.



Reducing Emissions from Buildings and New Developments cont: Theme 2

Within this plan the bar will be raised from achieving “air quality neutral” to “air quality positive” for the largest developments, and all major development proposals “must be at least air quality neutral” and be submitted with an air quality assessment.

Key actions from our Action Plan-

- Revise our Code of Construction Practice for developers;
- Publish a holistic Carbon Reduction Strategy for Council buildings;
- Ensure NRMM compliant planning conditions are applied to all major developments.



Public Health and Raising Awareness: Theme 3

We will continue to inform residents, businesses and visitors about local air pollution levels, and by doing this we can help protect those who are most sensitive to its health impacts. We understand that by Increasing the public’s understanding of the sources and effects of air pollution can also influence changes in behaviour which in turn improve air quality, for example modal shift changes away from using a car to drive children to school towards other more sustainable forms of travel, and through promoting health lifestyles such as cycling and walking, all of which will result in decreased pollution.

Partnering with Public Health is another way we will work to increase awareness around air pollution; health professionals are trusted and independent voices who are able to help us reach out to those members of the community that are most adversely affected by air pollution, such as the elderly, and those who are hardest to reach, such as those whose English is not their first language.

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Key actions from our Action Plan-

- we will continue to support and disseminate information on high pollution episodes through alert systems such as airTEXT;
- we will build closer relationships between the council and Public Health professionals including GPs to raise awareness of air pollution among traditionally hard to reach groups;
- we will undertake and promoting anti-idling campaigns around schools;
- we will promote campaigns on cleaner smoke-free fuels for heating;

Reducing Emissions from Transport: Theme 4

Road traffic is the single largest source of NO₂ emissions within Bromley. The geographically specific nature of road-related air pollution means that transport emissions also heavily contribute to air pollution hotspots across the borough. It is also an area of emissions that we as a local authority have only limited control over, on issues ranging from the tax regime for diesel vehicles (the responsibility of central Government) to allowed emissions from black taxis and buses (responsibility of TfL and the Mayor of London).

We will implement a range of measures to reduce emissions from transport sources throughout the borough. These will include actions for: Delivery Servicing and Freight, greening our Council fleet and promoting cleaner transport.

Key actions from our Action Plan-

- We will improve the walking and cycling infrastructure and promote the use of greener routes such as the National Cycle Network;
- We will reduce emissions from the Council's fleet including the phased replacement of gritters in 2020 whereby Euro VI rated vehicles are introduced;
- We will minimise emissions from contractors by smart procurement measures;
- We will progress the installation of Ultra Low Emission Vehicle (ULEV) infrastructure, and ensure that with new homes 1 in 5 car parking spaces have an electric charge point;
- We will provide education on fuel efficiency as part of the driver induction process of all new staff;
- We will promote the use of alternative transport for those staff (including the provision of electric bikes) who undertake visits where possible.

Local Solutions: Theme 5

These measures seek to improve the environment of neighbourhoods through a combination of measures;

Key actions from our Action Plan-

- We will identify opportunities for greening infrastructure through the planning process;
- We will undertake a feasibility study for enhancing the public realm potentially through gyratory removal at Elmers End;
- We will deliver the Shortlands Friendly Village Scheme;
- Tree plan (expand)?



Consultees



- The Secretary of State;
- The Environment Agency;
- Transport for London (who will provide a joint response with the Mayor);
- All neighbouring boroughs and/or neighbouring district and county councils;
- Other public authorities as the borough considers appropriate;
- Bodies representing local business interests and other persons/ organisations as considered appropriate;
- Residents

*Results of Consultation**

*TBC following conclusion of consultation

*The Air Quality Matrix **

** currently presented as an Appendix, but will be inserted here following the consultation.*

Appendix A Proposed Extension of the AQMA

As part of the UK National Air Quality Strategy, the Environment Act 1995 requires Local Authorities to declare Air Quality Management Areas at locations where air quality does not meet the Air Quality Objective (AQO) limits for certain pollutants.

Table 1 AQOs

Pollutant	Objective	Averaging Period
Nitrogen dioxide (NO ₂)	200µg/m ³ not to be exceeded more than 18 times a year	1-hour mean
	40µg/m ³	Annual mean
Particulate Matter (PM ₁₀)	50µg/m ³ not to be exceeded more than 35 times a year	24-hour mean
	40µg/m ³	Annual mean
Particulate Matter (PM _{2.5})	Work towards reducing emissions/concentrations of fine particulate matter (PM _{2.5})	Annual mean
Sulphur dioxide (SO ₂)	266µg/m ³ not to be exceeded more than 35 times a year	15-minute mean
	350µg/m ³ not to be exceeded more than 24 times a year	1-hour mean
	125µg/m ³ not to be exceeded more than 3 times a year	24-hour mean
Benzene (C ₆ H ₆)	16.25µg/m ³	Running annual mean
	5µg/m ³	Annual mean
1,3-Butadiene (C ₄ H ₆)	2.25µg/m ³	Running annual mean
Carbon Monoxide (CO)	10mg/m ³	Maximum daily running 8-hour mean
Lead (Pb)	0.5µg/m ³	Annual mean
	0.25µg/m ³	Annual mean

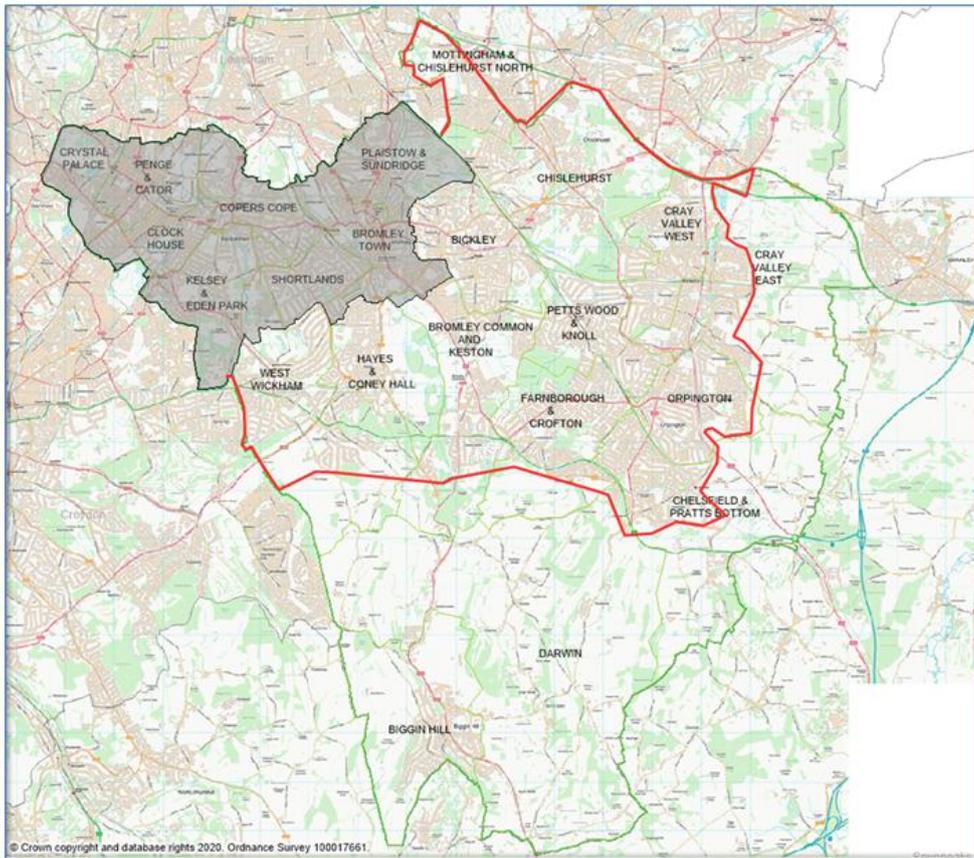
Bromley has met all of the AQO's other than the annual mean objective for the pollutant NO₂. It is a statutory requirement that an AQMA be declared for areas where air quality does not meet the AQO limits for certain pollutants, as a result, one AQMA was declared in 2007 in the North West of the borough due to exceedances of the annual mean for NO₂ (See Map 1 area shaded grey).

As required by the LLAQM, from 2020 onwards, local monitoring and mapping provided by the GLA must be utilised to review whether any declared AQMAs should be revised. This review was undertaken, and whilst modelled data from the GLA shows an overall decline in the annual average concentrations for NO₂ (see Maps 2-5), the 2020 modelled data supports an extension to the AQMA (see Map 3).

The updated pollution maps (Maps 2 and 3) within the draft plan, and Map 4-5 inserted below,

clearly demonstrate that the areas of highest pollution are attributable to the strategic and major road networks including the A20 and A21, and it is proposed that the current AQMA be extended across the North of the Borough (the top two thirds), with the borders being marked in red (Map 1).

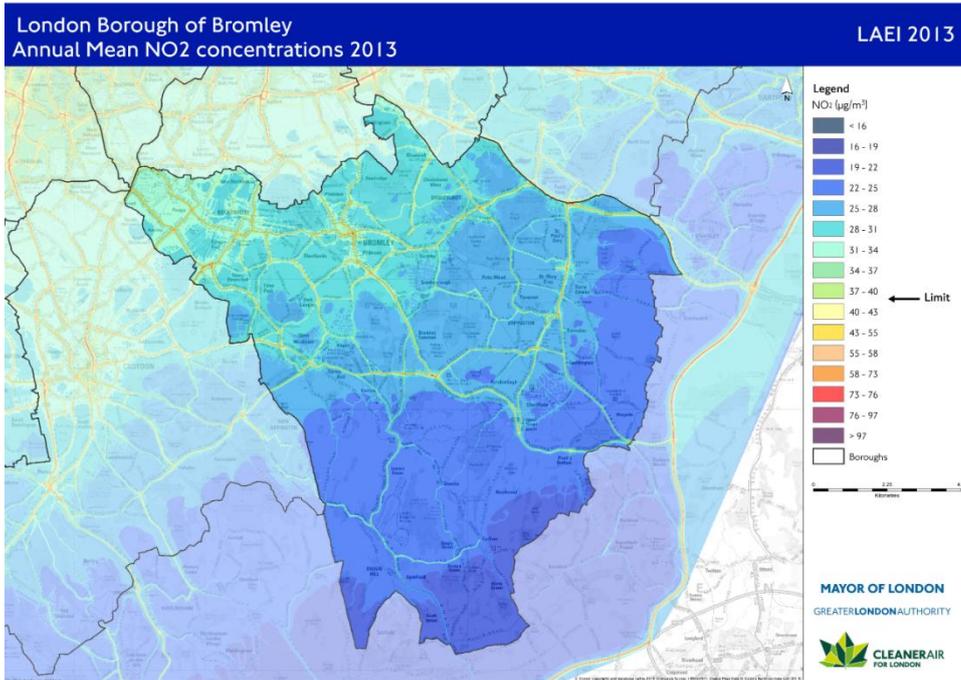
Map 1 The existing AQMA declared in 2007 Shaded Grey:



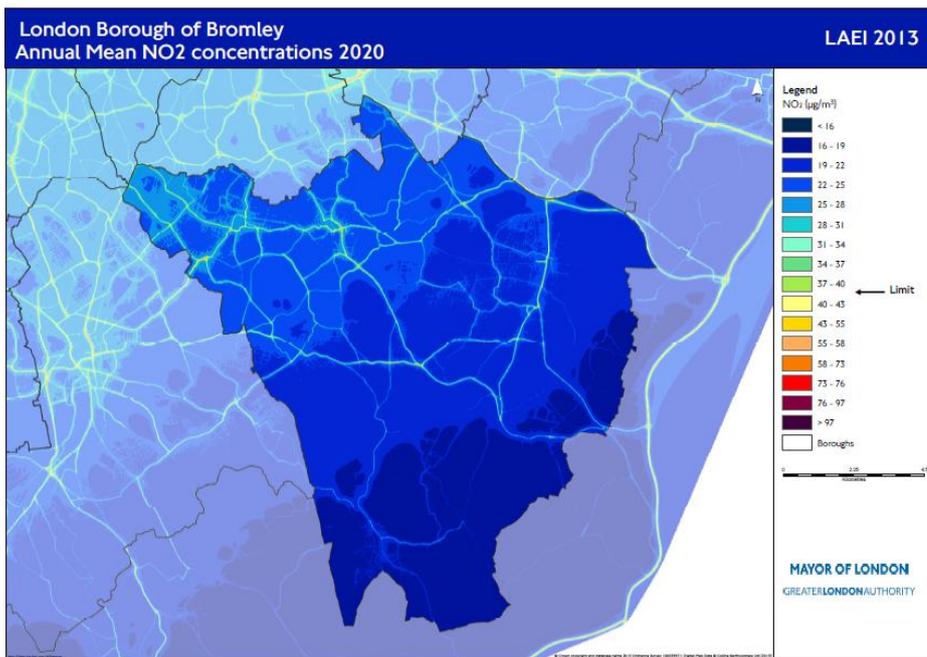
Legend

- Current AQMA 
- Proposed new boundary 
- Borough boundary 

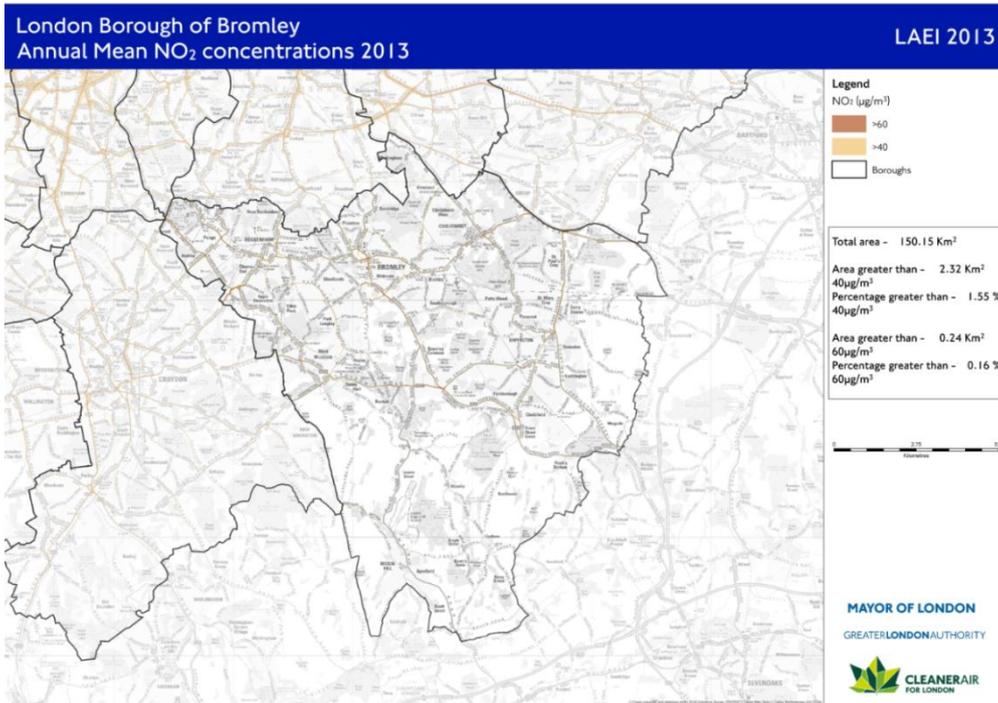
Map2 Bromley Modelled Annual Mean NO2 Concentrations 2013



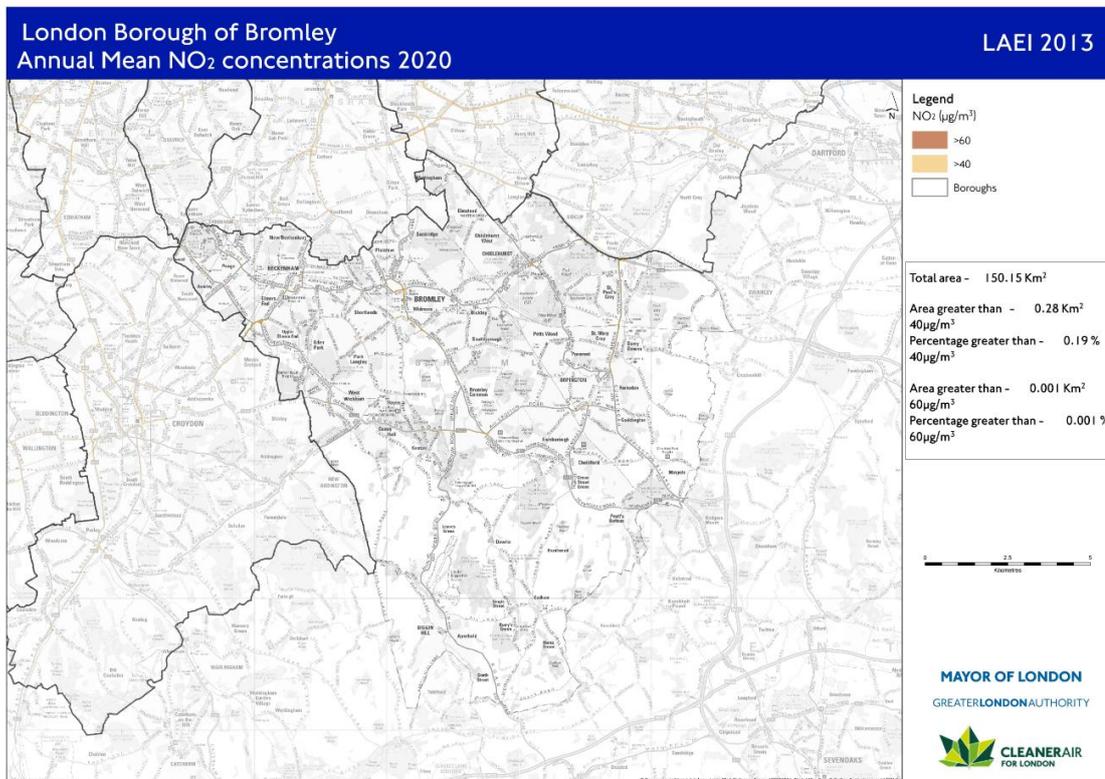
Map 3 Bromley Modelled Annual Mean NO2 Concentrations 2020



Map 4 Bromley Modelled Annual Mean NO₂ Concentrations 2013 Showing Total Area Greater the 40µg/m³



Map 5 Bromley Modelled Annual Mean NO₂ Concentrations 2020 Showing Total Area Greater the 40µg/m³



	Action name	Description of Actions	Evidence	Responsibility	Magnitude of Benefit High (3) Medium (2) Low (1)
MONITORING: Theme 1					
1	Ensure that appropriate and effective monitoring is undertaken across Bromley to meet statutory obligations.	Ongoing maintenance of the Harwood Ave air quality monitoring station (AQMS)	The successful submission and publication of Annual Status Reports and other statutory documents to Defra / GLA	Environmental Protection	3
		Publish an annual report of air quality data on Bromley's website	The successful submission and publication of Annual Status Reports and other statutory documents to Defra / GLA	Environmental Protection	1
		Seek funding where appropriate (via s106 agreements for reference monitoring in Bromley)	Submissions	Environmental Protection	2
		Review of diffusion tube network following the extension of the AQMA and add additional diffusion monitoring points	Review completed and additional points added	Environmental Protection	2
		Seek funding for AQMS to measure PM10 and PM 2.5 NO2 and O3 at Biggin Hill	Submissions	Environmental Protection	2
		Prioritise the provision of a PM2.5 monitor if installing new monitors	Business Case	Environmental Protection	2
		Seek to test appropriate new smart monitoring technologies as they develop		Environmental Protection	3
		Continue to support major developers in siting and installing construction site dust monitors	Advice Given	Environmental Protection	1
		Membership of the LAQN	Membership status	Environmental Protection	3
		Borough review of Part B processes to ensure all relevant process are captured	Review completed and all permits issued and No of permits issued	Environmental Protection	3

	Action name	Description of Actions	Evidence	Responsibility	Magnitude of Benefit High (3) Medium (2) Low (1)
Reducing Emissions from Developments and Buildings: Theme 2					
2	Ensuring emissions from demolition and construction are minimised	Require Construction Environmental Management Plans for major developments	CEMPs assessed	Planning	3
		Require real-time PM10 monitoring at high risk sites in accordance with the Mayor of London SPG.	Monitors installed	Planning and Environmental Protection	2
		Enforcement visits when complaints received.	visits undertaken	Environmental Protection	2
		Update Bromley's existing Code of Construction Practice	Code updated	Environmental Protection	3
		Produce informative for developers to promote low combustion and combustion free development	Informative produced	Environmental Protection	2
		Adopt revised planning conditions and informatives regarding the use of diesel generators	Adoption of any additional information / informatives	Environmental Protection	3
		Effectively manage and mitigate emissions of development taking place in the designated AQFAs through New Bromley Plan	Number of applications assessed in Focus Areas with additional requirements	Planning	2
		Where appropriate, use planning obligations to secure funding from developers for monitoring compliance checks on major and/or sensitive sites.	Amount of funding secured	Planning and Environmental Protection	1
		Continue to assess all relevant planning applications for their air quality impact and condition as appropriate	Number of applications assessed, against no received	Enviro Protection	2
3	Ensuring enforcement of Non Road Mobile Machinery (NRMM) air quality policies	Apply conditions for construction sites to ensure compliance with the GLA's NRMM requirements *Planning conditions to include where appropriate: Air Quality Assessment AQN assessment CEMP to include PM10 monitoring NRMM compliance with London LEZ Seek funding for air quality measures through S.106, CIL where feasible	Number of developments registered and compliant	Environmental Protection and Planning Enforcement	2
		Ensure emissions from construction sites are minimised through cooperation with developers and site visits, including effective dust monitoring where appropriate, and compliance with GLA NRMM requirements	Compliance visits	Environmental Protection and Planning Enforcement	1
4	Reducing emissions from CHP and ensure smaller developments use ultra-low NOx boilers	Require developments with CHP to be air quality neutral as a minimum	Number of developments applied	Planning	3
		Require developers to meet the GLA's emissions limits for Combined Heat and Power (CHP) and Biomass boilers	As Above	Planning	3
		Set requirement for evidence of maintenance of CHP and associated plant	As Above	Carbon Management	2

	Action name	Description of Actions	Evidence	Responsibility	Magnitude of Benefit High (3) Medium (2) Low (1)
Reducing Emissions from Developments and Buildings: Theme 2					
5	Enforcing Air Quality Neutral Policies	Apply Air Quality Positive for regeneration areas in line with the new London Plan	Agree standard planning conditions to require compliance with AQN standards and London Plan policy	Planning	3
		Set requirement for evidence of maintenance of CHP and associated plant	Number of developments applied		2
6	Ensuring adequate, appropriate, and well located green space and infrastructure is included in new and existing developments, where appropriate.	Planning application / conditions Set targets to improve levels of green infrastructure provided in new developments.*To be considered on a case-by-case basis through application of relevant London Plan Policies	As Above	Planning Development And Control	2
		Ensure that exposure to poor air quality in amenity spaces is considered at design stage and as part of the AQA.*To be considered on a case-by-case basis through application of relevant London Plan Policies	As Above	Planning and Enviro Protection	2
7	Ensuring that Smoke Control Areas (SCA) are appropriately identified and fully promoted	Carry out awareness campaigns and provide advice on appropriate fuel	As Above	Public Health and Environmental Protection	2
		Effectively fulfil statutory duties as a Smoke Control Area	Promotion and Education Campaign and Respond to Complaints	Environmental Protection	2
		Continue to control emissions from permitted processes through inspections and enforcement (see also action 1)	Number of sites with permits related to Local Air Pollution Prevention and Control guidance	Environmental Protection	2
8	Deliver energy efficiency retrofitting projects in workplaces and homes through EFL retrofit programmes such as RE:NEW, RE:FIT and through borough carbon offset funds to replace old boilers /top-up lost insulation in combination with other energy conservation measures.	Promoting and delivering energy efficiency retrofitting projects in workplaces and homes	ECO Flex declarations commenced in 2017. The projected figure for Bromley in 2019/20 is 12 declarations covering 53 households with an escalation year on year.	Housing	2
		Follow up proposals for inclusion in a revised policy for the retrofitting of air pollutant reduction equipment for clients living in areas identified as most likely to trigger detrimental health effects	Revised Policy	Housing	2
		Continue with the advice service for households at risk of fuel poverty in south east London. Target- to carry out 800 home visits and 800 one-to-one advice sessions at events across South East London including Bromley		In Partnership with Neighbouring boroughs (South East)	1
		As part of a current review of the use of discretionary grant funding linked to Disabled Facilities Grants and the Better Care Fund	Review	Housing	1

	Action name	Description of Actions	Evidence	Responsibility	Magnitude of Benefit High (3) Medium (2) Low (1)
Reducing Emissions from Developments and Buildings: Theme 2					
	Promoting and delivering energy efficiency projects in council buildings – leading by example	All projects have a demonstrable carbon reduction and will be appraised independently. Overall organisational emissions reductions will be evidenced in the Council's Carbon Management Programme. Carbon Management Programmes and other energy emissions reports can be viewed at: bromley.gov.uk/info/2001105/sustainability *Individual timescales depend on project scope; the financial investment and works required vary. All projects feed into on-going carbon management programme, each lasting 5 years. Costs are project specific to include SEELS and SALIX loans	Appraisals undertaken	Carbon Management	2
8A	Update local authority procurement policies to reduce pollution from logistics and servicing, and to maximise air quality benefits from council contracts	Production of a sustainability toolkit for service leads to consider sustainability issues including carbon and air quality when initiating the procurement process.	Toolkit developed	Procurement and Carbon Management	2
8B		LB Bromley Sustainability Policy to be further developed	Policy to be developed	Procurement and Carbon Management	1
		Seek to influence supplier behaviour through Circular economy principles: reduced journeys, shared services, product life extension, waste minimisation, energy recovery from waste	Contracts analysed	Procurement and Carbon Management	2
9	Ensure master planning and redevelopment areas are aligned with Air Quality Positive and Healthy Street approaches.	Update ASR and planning portal	Portal updated	Development Control	1

	Action name	Description of Actions	Evidence	Responsibility	Magnitude of Benefit High (3) Medium (2) Low (1)
Public Health And Awareness Raising: Theme 3					
10	Public Health department taking shared responsibility for borough air quality issues and supporting implementation of Air Quality Action Plans	The Health and Well-Being Board will include a new section within the Joint Strategic Needs Assessment (JSNA) with up to date information on air quality impacts on the population *Public Health Team to support engagement with local stakeholders (businesses, schools, community groups and healthcare providers)	Production of JSNA	Public Health	2
11	Engagement with businesses. This could be linked to the engagement with town centre BIDS proposed in the final LIP to promote active and public transport options to their members, reducing pollution in town centres through mode shift	Promote active travel and public transport to businesses. The Council will host events such as free cycle training and Dr Bike sessions for BIDs who are proactively engaged	Record number of businesses actively engaged with, Record number of businesses actively participating in emissions reductions initiatives	Traffic and Road Safety	2
12	Promotion of availability of airTEXT	Public Health team to support promotion through GP practices and pharmacies Membership of airTEXT consortium	No of signups to the AirTEXT Alerts	Public Health and Enviro Protection also self-promotion by AirTEXT	3
13	Encourage schools to join the TfL STARS accredited travel planning programme by providing information on the benefits to schools and supporting the implementation of such a programme.	Use of the STARS programme in schools as a tool to promoting active travel to school. The Council will consider infrastructure enhancements proposed in the travel plan of Gold accredited schools as part of its annual LIP programme. Bronze or Silver STARS accredited schools will be encouraged to gain Gold accreditation. *The vast majority of schools in Bromley promote travelling to school by methods other than car. Initiatives such as 'Walk on Wednesday' the 'Walking Bus' and 'Bikeability' all contribute to an environment where being active is a normalised part of day to day life for families in Bromley	Number of Bronze, Silver Gold accreditations	Traffic and Road Safety	2
14	Air quality in and around schools.	Ongoing co-ordination of the Healthy Schools London in Bromley project, to improve children and young people's health and well-being. Target is to add 5% more schools each year. *over ninety schools currently participating. London Healthy Early Years (HEYL) supports and recognises achievements in child health, wellbeing and education in early years settings. Well over one hundred Bromley Early Years settings have already registered with a target of an additional 5% year on year.	5% target achieved	Public Health	
		The Borough is currently undertaking a trial of a green screen around Valley Primary School as part of the Shortlands Friendly Village (Liveable Neighbourhood) project. If successful, consideration will be given to how the green screens can be delivered to more schools in the AQMA. *This delivers on the LIP3 commitment to look to undertake a trial of new green infrastructure, such as trees and green walls around schools in the AQMA and alongside corridors with the highest concentrations as a means of natural emissions capture	Results of trial	Traffic and Road Safety	1
		Promote campaign on anti-idling, involving specific signage, communications activity and increased enforcement in idling hotspots around 8 schools (see also 21). *A more targeted approach to idling, focusing on schools will be taken, which should make a differences in areas over short periods of time, utilising a variety of comms and enforcement action	No of FPNs or verbal warnings given, campaigns undertaken and locations targeted (see also 21)	Traffic and Road Safety	1

	Action name	Description of Actions	Evidence	Responsibility	Magnitude of Benefit High (3) Medium (2) Low (1)
Reducing Emissions From Transport: Theme 4					
15	Update local authority procurement policies to reduce pollution from logistics and servicing.	Seek to influence supplier behaviour through circular economy principles: reduced journeys, shared services, product life extension, waste minimisation, energy recovery from waste.	Contracts analysed	Commissioning and Procurement	2
15 cont.		Require suppliers with large fleets to have attained Bronze / Silver / Gold Fleet Operator Recognition Scheme (FORS) accreditation. *Bromley's LIP3 sets out a road map to reducing emissions from the LBB fleet to 2041 and working with procurement, the Council will be asked to consider how they could ask contractors to innovate towards a greener fleet and to reduce emissions from the Council's fleet	No of suppliers accredited	Strategic Transport	2
16	Reducing emissions from deliveries to local businesses and residents	Sustainability toolkit for service leads to consider sustainability issues including carbon and air quality when initiating the procurement process. Will require measurements that are proportional and appropriate to contract size	Toolkit produced	Commissioning and Procurement	2
		LB Bromley sustainability Policy to be further developed	Policy updated	Strategic Transport	2
		The Council will continue to seek to work with collection locker providers to provide such facilities in some borough car parks to reduce delivery miles	Provision of facilities	Third Party Agencies	2
		Any development likely to create a significant number of trips will, where necessary, is required to enter into an agreement to submit and implement acceptable Construction Logistics Plans, and Delivery/Service Plans. Consideration will be given to re-organisation of freight to support consolidation (or micro-consolidation) of deliveries, by setting up or participating in new logistics facilities, and/or requiring that council suppliers participate in these.	CLP and SDP submitted	Planning	2
17	Reducing emissions from council fleets	Council fleet and hired fleet to meet Quality Standard. Operating data and feedback will be collected to help inform future replacements and procurement projects	Compliance with standard	Transport operations	2
		Increase the number of plug-in hybrid and electric council vehicles through planned replacement programme	No increased	Neighbourhood Management and Transport	3
		Increase the uptake of new Euro VI vehicles in the heavier fleet, phase out older vehicles operated by our contractors by April 2020	No Increased, and older fleet phased out in target time	Commissioning and Procurement	2
		Promote fuel-efficient driving through the driver induction and competence checks	No of inductions	Transport	2
		Work in partnership with our Waste contractor to ensure our infrastructure allows for a fully electric waste collection fleet in 2026	Improvement in infrastructure	Neighbourhood Management	3
		Monitor progress with vehicle manufacturers, other similar operators and technical developments to further support the intake of alternatively fuelled vehicles.	Monitoring undertaken		1
		Increase the use of pool vehicles	Uptake monitored	Neighbourhood Management	1

	Action name	Description of Actions	Evidence	Responsibility	Magnitude of Benefit High (3) Medium (2) Low (1)
Reducing Emissions From Transport Theme 4					
17 cont.		Maintain the FORS accreditation held by the Council's Waste, Streets and Parks contractors.	Accreditation in place	Neighbourhood Management	1
		Equip waste vehicles with the 'Driving Efficiently and Safely' (DES) tracking and monitoring system to monitor and minimise idling, braking, over-revving, and contravention of speed limits	No of vehicles equipped	Neighbourhood Management	2
		Supervisors of the waste and street cleansing service to use electric vehicles	Compliance with protocol	Neighbourhood Management	1
		Installation of electric charging point for HGV's	Installation of points	Transport	1
		Increase the % of mobile equipment used (e.g. electric chainsaws) by the Arboriculture contractor	Increase over the current 30% level	Neighbourhood Management	1
17A	Staff Lease Car Scheme	Promote the uptake of alternative fuel cars via the staff lease scheme. The option to further incentivise drivers will be a discussion point when approaching the next procurement exercise	14% of the fleet is now hybrid/plug in or pure electric - increase over this level	Transport operations	1
	Action name	Description of Actions	Evidence	Responsibility	Magnitude of Benefit High (3) Medium (2) Low (1)
Localised Solutions: Theme 5					
18	Expanding and improving Green infrastructure	Through Planning process, identify opportunities for green infrastructure		Planning	2
		Feasibility of enhancing the public realm potentially through gyratory removal at Elmers End (see also 19).	Future LEN bid when resources allow	Planning and Highways	2
18A	Maintain and increase Council's green infrastructure	Continue to provide an annual tree planting plan and where possible consider planting trees in areas where they will be of most benefit to local air quality	Tree planting plan produced	Neighbourhood Management	2
		Increase the number of street and parks trees via funding	Bids to potential funding opportunities e.g. GLA Greener City fund	Neighbourhood Management	3
19	Low Emission Neighbourhoods (LENs)	Re-submit previously unsuccessful bid to the Mayor's Air Quality Fund for a Low Emission Neighbourhood in Birkbeck village in Bromley's AQMA, which is bounded by the A213 and A214 *Options are being considered for how the benefits of the scheme can be derived without LEN funding	Resubmit bid	Traffic and Road Safety	1
		Feasibility study for enhancing the public realm potentially through gyratory removal at Elmers End.	Future LEN bid when resources allow	Traffic and Road Safety	2
19A	Provide waste and recycling collections specifically to reduce need for residents to make trips to Council Household Reuse and Recycling Centres	Continue to provide existing comprehensive waste and recycling collection service	Ongoing	Neighbourhood Management	2
19B	Reduce the Council's Environmental Services contractors transport to work emissions	Provide a kerbside collection service for textiles, batteries and small electrical items*The Council provides a collection service for the Core Materials as required within the London Environment Strategy	Ongoing	Neighbourhood Management	2

	Action name	Description of Actions	Evidence	Responsibility	Magnitude of Benefit High (3) Medium (2) Low (1)
Localised Solutions: Theme 5					
19B cont.	Reduce the Council's Environmental Services contractors transport to work emissions	Liaise with Council's contractor to expand on materials accepted at the kerbside and promote the Council's chargeable garden waste service	Ongoing	Neighbourhood Management	2
		Ensure contractors traffic management plans include a section on sustainable transport	Review traffic plans	Neighbourhood Management	2
19C	Minimise dust generation at Council's Waste Transfer Stations	Promote dust management at sites – using the accordance with the Mayor of London SPG as an exemplar.	Audits undertaken/advice given/actions uptake	Neighbourhood Management	2
19D	Reduce emissions from closed landfill site	Monitor and manage landfill gas generated by closed landfill site through existing network of pipes and landfill gas flare	Monitoring undertaken	Neighbourhood Management	2
19E	Reduce arboriculture haulage movements	Install wood chip bins within the boroughs parks instead of transporting woodchip outside the borough*Parks Contractor will be able to use woodchip for bedding, path creation rather than woodchip being used as biomass	Installation	Neighbourhood Management	1
	Action name	Description of Actions	Evidence	Responsibility	Magnitude of Benefit High (3) Medium (2) Low (1)
Reducing Emissions From Transport: 4					
20	Ensure that Transport and Air Quality policies and projects are integrated.	Through this AQAP and Bromley's LIP3 officers will continue dialogue regarding project and policy implementation. *Transport and Environmental Health staff form part of core AQAP Steering Group	Ongoing	Highways and Public Protection	3
21	Discouraging unnecessary idling by taxis, coaches and other vehicles	The Council is participating in the London-wide anti-idling campaign funded from the Mayor's Air Quality Fund with eight schools in the borough to hold anti-idling campaigns per annum. PCN enforcement will allow for a significantly higher penalty for idling to be applied	8 campaigns	Traffic and Road Safety	
		The Borough has adopted powers to enforce against idling vehicles but will look to create a Borough-wide TMO to allow for PCN enforcement which will be easier to enforce with existing and widely allocated CEO resources	TMO created	Traffic and Road Safety	3
22	Temporary car free days.	Work with BIDs to support a suitable programme of weekend road closures to allow town centres and high streets to be used in new and innovative ways, supporting vibrant town centres and communities	Closures applied	Traffic and Road Safety	2
		Continue with Play Street events and engage with residents in discussions about possible changes in the locality that would enhance walking and cycling	Events Held	Public Health and Traffic and Road Safety	1
23	Using parking policy to reduce pollution emissions.	The use of electric vehicles will be promoted by providing the appropriate infrastructure. There are national policies in place to influence road users' choice of vehicle but parking policy is not considered to have an impact on the use of those vehicles. * As even EVs will emit pollutants in the form of Particulate Matter via brake and tyre debris and road wear and tear. The borough's priority will be to encourage active travel where this can be a genuine option for the user	Events and promotion	Parking	2

	Action name	Description of Actions	Evidence	Responsibility	Magnitude of Benefit High (3) Medium (2) Low (1)
Reducing Emissions From Transport: Theme 4					
24	Installation of Ultra-low Emission Vehicle (ULEV) infrastructure such as electric vehicle charging points, rapid electric vehicle charging points and hydrogen refuelling stations	Work with Bluepoint London to continue to roll out electric vehicle charging infrastructure. *There are national policies in place to influence road users' choice of vehicle but parking policy is not considered to have an impact on the use of those vehicles	Maintain membership of the Source London network and expansion of the infrastructure	Traffic and Road Safety	2
		Install 4 Rapid Charge Points as part of the TfL scheme by March 2020 along with the 4 installed on the A232 TLRN in Coney Hall and West Wickham	Installation of the points	Traffic and Road Safety	3
		Policy 30 of the Local Plan requires 1 in 5 car parking spaces to be provided with electric vehicle charge points	Application of the plan	Planning	2
		Implementation of a pilot for lamp post charging points, including £30K LIP investment match funded by GULCS	Outcome of pilot	Traffic and Road Safety	1
25	Provision of infrastructure to support walking and cycling and encourage mode shift away from private vehicle usage	Development of new cycle routes, both as part of TfL's strategic cycle network and local routes	Outcome 1 of Bromley's LIP3	Traffic and Road Safety	3
		Delivery of the 'Shortlands Friendly Village Scheme'	Scheme delivered	Traffic and Road Safety	2
		Delivery of area based schemes that promote walking and reduce road danger	Schemes delivered	Traffic and Road Safety	1
		Improve pedestrian safety- installation of new pedestrian crossings	Crossing installed	Traffic and Road Safety	2
		Improve pedestrian infrastructure to encourage walking to school	Infrastructure improved	Traffic and Road Safety	2
		Provide high quality cycle hubs at stations and continue to deliver on-street cycle parking and Bike hangers	Hubs installed	Traffic and Road Safety	2

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Report No.
FSD20032

London Borough of Bromley

PART ONE - PUBLIC

Decision Maker: ENVIRONMENT & COMMUNITY SERVICES PORTFOLIO HOLDER

Date: For pre-decision scrutiny by the Environment and Community Services PDS Committee on 17th March 2020

Decision Type: Non-Urgent Executive Non-Key

Title: CAPITAL PROGRAMME MONITORING - 3RD QUARTER 2019/20 & CAPITAL STRATEGY 2020 TO 2024

Contact Officer: Katherine Ball, Principal Accountant
Tel: 020 8313 4792 E-mail: Katherine.Ball@bromley.gov.uk

Chief Officer: Director of Finance

Ward: All

1. Reason for report

On 12th February 2020, the Executive received a report summarising the current position on capital expenditure and receipts following the 3rd quarter of 2019/20, and presenting for approval the new capital schemes in the annual capital review process. The Executive agreed a revised capital programme for the five year period 2019/20 to 2023/24. This report highlights changes agreed by the Executive in respect of the Capital Programme for the Environment & Community Services Portfolio. The revised programme for this portfolio is set out in Appendix A and detailed comments on individual schemes are shown in Appendix B and the new schemes approved for this Portfolio are set out in paragraph 3.6.

2. **RECOMMENDATION(S)**

The Portfolio Holder is asked to note and confirm the changes agreed by the Executive on 12th February 2020.

Impact on Vulnerable Adults and Children:

1. Summary of Impact:

Corporate Policy

1. Policy Status: Existing Policy: Capital Programme monitoring is part of the planning and review process for all services. Capital schemes help to maintain and improve the quality of life in the borough. Effective asset management planning (AMP) is a crucial corporate activity if a local authority is to achieve its corporate and service aims and objectives and deliver its services. For each of our portfolios and service priorities, we review our main aims and outcomes through the AMP process and identify those that require the use of capital assets. Our primary concern is to ensure that capital investment provides value for money and matches the Council's overall priorities as set out in the Community Plan and in "Building a Better Bromley". The capital review process requires Council Directors to ensure that bids for capital investment provide value for money and match Council plans and priorities.
2. BBB Priority: Excellent Council

Financial

1. Cost of proposal: Total increase of £2.3m over the five years 2019/20 to 2023/24, mainly due to the approval and extension into 2023/24 of £2.2m for the TfL Formula Funding scheme.
2. Ongoing costs: Not Applicable
3. Budget head/performance centre: Capital Programme
4. Total current budget for this head: £29.4m for the Environment & Community Services Portfolio over the five years 2019/20 to 2023/24
5. Source of funding: Capital grants, capital receipts and earmarked revenue contributions (including S106)

Personnel:

1. Number of staff (current and additional): 1 fte
2. If from existing staff resources, number of staff hours: 36 hours per week

Legal

1. Legal Requirement: Non-Statutory - Government Guidance
2. Call-in: Applicable

Procurement:

1. Summary of Procurement Implications:

Customer Impact

1. Estimated number of users/beneficiaries (current and projected): N/A

Ward Councillor Views

1. Have Ward Councillors been asked for comments? N/A
2. Summary of Ward Councillors comments: N/A

3. COMMENTARY

Capital Monitoring – variations agreed by the Executive on 12th February 2020

3.1 A revised Capital Programme was approved by the Executive on 12th February 2020, following a detailed monitoring exercise carried out after the 3rd quarter of 2019/20. The base position is the programme approved by the Executive on 27th November 2019, as amended by variations approved at subsequent Executive meetings. All changes to schemes in the Environment & Community Services Portfolio Programme are itemised in the table below and further details are included in paragraphs 3.2 to 3.6. The revised Programme for the Portfolio is attached as Appendix A, whilst Appendix B shows actual spend against budget in 2019/20, together with detailed comments on individual scheme progress.

	2019/20	2020/21	2021/22	2022/23	2023/24	TOTAL 2019/20 to 2023/24
	£'000	£'000	£'000	£'000	£'000	£'000
Programme approved by Executive 27/11/19	11,719	5,906	6,210	3,210	0	27,045
<u>Variations approved by Executive 12/02/20</u>						
Central Depot Wall Reconstruction (para 3.2)	115	0	0	0	0	115
Bus Priority Programme (TfL funded) (para 3.3)	10	0	0	0	0	10
Schemes rephased from 2019/20 into 2020/21 (Para 3.4)	Cr 2,542	2,542	0	0	0	0
New Schemes (see para 3.6)	0	0	0	0	2,210	2,210
Total amendments to the Capital Programme	Cr 2,417	2,542	0	0	2,210	2,335
Total Revised Environment & Community Services Programme	9,302	8,448	6,210	3,210	2,210	29,380

3.2 Central Depot Wall Reconstruction (£115k increase in 2019/20 budget)

At its meeting on 15th January 2020, the Executive agreed to fund additional costs of £115k for this existing capital scheme from the Infrastructure Investment Fund (earmarked reserve) and Executive on February 12th formally agreed to increase the capital estimate.

3.3 TfL Bus Priority Capital Programme (£10k increase in 2019/20 budget)

On 12th February 2020 the Executive agreed to increase the existing 2019/20 budget by £10k, in relation to improvements at the junction of Mottingham Road with Elmstead Lane, William Barefoot Drive and White Horse Hill in order to ease congestion and reduce injury collisions. The increase will be funded from a contribution from the Royal Borough of Greenwich.

3.4 Schemes re-phased from 2019/20 into 2020/21

As part of the 3rd quarter monitoring exercise, a total of £2,542k has been re-phased between 2019/20 and 2020/21 to reflect revised estimates of when expenditure is likely to be incurred. Scheme re-phasings are itemised in the table below and comments on scheme progress are provided in Appendix B.

Capital Expenditure - Re-phasing in Q3 Monitoring			
	2019/20	2020/21	TOTAL
	£000	£000	£000
Winter Maintenance - gritter replacement	Cr 36	36	0
Orpington Railway Station	Cr 48	48	0
Principal Roads Maintenance	Cr 311	311	0
Widmore Road	Cr 105	105	0
Orpington Public Realm Improvements	Cr 34	34	0
Street Lighting (Invest to Save Initiative)	Cr 193	193	0
Highway Investment	Cr 1,400	1,400	0
LIP Formula Funding	Cr 415	415	0
Total Environment & Community Services Portfolio re-phasing	Cr 2,542	2,542	0

Annual Capital Review – new scheme proposals

- 3.5 In recent years, the Council has steadily scaled down new capital expenditure plans and has transferred all of the rolling maintenance programmes to the revenue budget. General (un-earmarked) reserves, established from the disposal of housing stock and the Glades Site, have been gradually spent and have fallen from £131m in 1997 to £49.3m (including unapplied capital receipts) as at 31st March 2019. The Council's asset disposal programme has diminished and any new capital spending will effectively have to be met from the Council's remaining revenue reserves.
- 3.6 As part of the normal annual review of the Capital Programme, Chief Officers were invited to come forward with bids for new capital investment, including Invest to Save bids which were particularly encouraged. The 2023/24 annual provisions for TfL funded Highways and Traffic schemes (£2.2m) and feasibility studies (£10k) were approved and have been added to the Capital Programme.

Post-Completion Reports

- 3.7 Under approved Capital Programme procedures, capital schemes should be subject to a post-completion review within one year of completion. These reviews should compare actual expenditure against budget and evaluate the achievement of the scheme's non-financial objectives. A post completion report on the following scheme is currently due for the Environment & Community Services Portfolio:

- The Woodland Improvement Programme

This quarterly report will monitor the future position and will highlight any further reports required.

4. POLICY IMPLICATIONS

- 4.1 Capital Programme monitoring and review is part of the planning and review process for all services. The capital review process requires Chief Officers to ensure that bids for capital investment provide value for money and match Council plans and priorities.

5. FINANCIAL IMPLICATIONS

- 5.1 These were reported in full to the Executive on 12th February 2020. Changes agreed by the Executive for the Environment & Community Services Portfolio Capital Programme are set out in the table in paragraph 3.1.

Non-Applicable Sections:	Legal, Personnel and Procurement Implications, Impact on Vulnerable Adults and Children
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Background Documents: (Access via Contact Officer)	Capital Programme Monitoring Qtr 2 2019/20 (Executive 27/11/19) Capital Programme Monitoring Qtr 3 2019/20 (Executive 12/02/20)
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ENVIRONMENT & COMMUNITY SERVICES PORTFOLIO - APPROVED CAPITAL PROGRAMME 2019/20 - 3RD QUARTER MONITORING				
Capital Scheme/Project	3rd QUARTER 2019/20			Responsible Officer Comments
	Revised Estimate Nov 2019	Actuals to 31.12.19	Revised Estimate Feb 2020	
	£'000	£'000	£'000	
SCHEMES FULLY FUNDED BY TRANSPORT FOR LONDON				
Cycling on Greenways	9	0	9	TfL funding allocated to individual scheme
Borough Transport Priorities (not allocated)	298	191	298	TfL funding allocated to individual scheme
Biking Boroughs	51	51	51	TfL funding allocated to individual scheme
TFL - New Funding Streams				
Maintenance	901	501	590	TfL funding allocated to individual scheme
LIP Formula Funding	3,076	1,319	2,661	TfL funding allocated to individual scheme
Bus Stop Improvement Works	117	0	117	TfL funding allocated to individual scheme
Flexi Lane	4	1	4	TfL funding allocated to individual scheme
Shortlands Liveable Neighbourhood	149	28	149	TfL funding allocated to individual scheme
Bus Priority Programme	350	44	360	TfL funding allocated to individual scheme
Bikeability	64	59	64	TfL funding allocated to individual scheme
Widmore Road - BNV	305	200	200	TfL funding allocated to individual scheme
TOTAL SCHEMES FULLY FUNDED BY TRANSPORT FOR LONDON				
	5,324	2,394	4,503	
OTHER				
Winter Maintenance - Gritter Replacement	36	0	0	No planned gritter replacement will take place this year. Team is planning the next round of replacement vehicles - these are likely to be purchased in summer of 2020.
Orpington Public Realm Improvements	34	0	0	Balance of funding being utilised for minor redesigns to scheme.
Beckenham Town Centre Improvements	585	433	585	This scheme is funded by TfL, and most aspects of the capital works are now complete. Tree planting is currently underway, and enhancements to the street lighting await commencement. Following completion of capital works, a post completion report and safety audit must be undertaken. It is expected that most of this work will be completed within this financial year 2019/20, with some budget being used in 2020/21 to manage remedial works to paving.
Gosshill Road	43	0	43	Funded from TfL and S106. Works completed. Budget to be reviewed.

ENVIRONMENT & COMMUNITY SERVICES PORTFOLIO - APPROVED CAPITAL PROGRAMME 2019/20 - 3RD QUARTER MONITORING				
Capital Scheme/Project	3rd QUARTER 2019/20			Responsible Officer Comments
	Revised Estimate Nov 2019	Actuals to 31.12.19	Revised Estimate Feb 2020	
	£'000	£'000	£'000	
Orpington Railway Station	132	83	84	Funded from TfL and S106.
Central Depot Wall Scheme	500	0	615	Approved by Executive in March 2018. Budget of £716k funded from £163k carry forward & £553k from Infrastructure Investment. Additional budget of £115k was agreed by the Executive in January 2020. Structural Engineer (consultant) appointed. Tenders received and under evaluation. Programme and financials to be agreed; currently anticipated to complete by Q1 of 2020/21.
Depot Improvement Scheme	251	50	251	Approved by Exec on 11/07/18. PM and project board for the scheme have been recruited. Only consultancy costs anticipated this year and budget to be rephased. Design work anticipated to take 9 months with delivery of scheme a further 12-18 months.
Street Lighting Invest to Save Initiative	217	14	24	Funded by Invest to Save Fund (Exec 28/11/12). Additional works will be ongoing during the next six months as part of the project.
SALIX Street Lighting LED Upgrade	500	0	500	Total funding of £500k available. A street lighting LED upgrade project (using the entire fund) was approved by the Executive on 18/09/19. The project will be included as part of the existing highways drawdown contract. Currently working on the design specification and anticipate to commence works in December 2019 and use the full budget this financial year.
Betts Park Canal Bank Stabilisation Project	9	0	9	Approved Executive 14/09/16 - works are required to limit the risk to the Council of further claims for damage to properties at Betts Park Canal Bank. Small works to be carried out before financial year end. Budget will be fully utilised.
Highway Investment	3,912	2,043	2,512	Approved Exec 18/10/16, Council 09/12/16, £11.8m for investment in planned highway maintenance funded from capital receipts. These works are underway but will not be completed this financial year.
Scadbury Park Moated Manor	155	0	155	Approved by Exec Feb 2018 funded by £60k revenue and £95k Historic England. Full budget to be utilised this FY.
Local Highways Maintenance (Potholes, Damaged Roads etc)	1	0	1	Scheme completed. Remaining budget to be utilised before financial year end.
Feasibility Studies	20	0	20	
TOTAL OTHER	6,395	2,623	4,799	
TOTAL E&CS PORTFOLIO	11,719	5,017	9,302	

Report No.
ES20012

London Borough of Bromley

PART ONE - PUBLIC

Decision Maker: ENVIRONMENT & COMMUNITY SERVICES PORTFOLIO
HOLDER

For Pre-Decision Scrutiny by the Environment & Community Services
PDS Committee on:

Date: Tuesday 17 March 2020

Decision Type: Non-Urgent Executive Non-Key

Title: REDUCTION AND RECYCLING PLAN (RRP)

Contact Officer: Amy Harris, Waste Strategy Manager
E-mail: Amy.Harris@bromley.gov.uk

Chief Officer: Colin Brand, Director of Environment and Public Protection

Ward: (All Wards);

1. Reason for report

- 1.1 This report seeks approval for Bromley's Reduction and Recycling Plan (RRP) as set out in Appendix A.
 - 1.2 In May 2018, the Mayor of London published the London Environment Strategy (LES). One of the requirements of the LES is for each London authority to produce a RRP, which will enable boroughs to achieve the specific waste management objectives and targets set in the LES.
 - 1.3 Bromley has a long tradition of providing a high performing waste management service and has consistently been one of the top performers in the London Recycling League Table. Bromley's RRP documents the actions that will be taken by the Council to continue to deliver the Council's corporate priorities for waste management with a focus on waste minimisation, recycling and carbon reduction.
 - 1.4 The RRP covers the period May 2019 to May 2022. The majority of the actions are already incorporated within Service Delivery Plans for the new Waste Disposal and Waste Collection contracts.
-

2. **RECOMMENDATION(S)**

The Portfolio holder is asked to:

- 2.1 Review and approve Bromley's Reduction and Recycling Plan as set out in Appendix A.

Impact on Vulnerable Adults and Children

1. Summary of Impact: Waste collection services affect all residents including vulnerable adults and children. Consideration of any additional impacts on particular groups of residents is taken when making changes to the service. Therefore, the potential impacts on vulnerable adults and children and mitigation measures will be considered before implementing specific actions within the RRP.
-

Corporate Policy1. Policy Status: Existing Policy

2. BBB Priority: Excellent Council Quality Environment
-

Financial

1. Cost of proposal: No Cost: None at this stage; subject to financial viability, business case assessment and affordability
 2. Ongoing costs: Not Applicable: Cost of current strategy met from existing budgets; costs of future policy changes TBD
 3. Budget head/performance centre: Waste Services
 4. Total current budget for this head: £17.9 million
 5. Source of funding: Existing waste services revenue budget
-

Personnel

1. Number of staff (current and additional): Not Applicable
 2. If from existing staff resources, number of staff hours: Not Applicable
-

Legal

1. Legal Requirement: Statutory Requirement: Further Details
 2. Call-in: Applicable:
-

Procurement

1. Summary of Procurement Implications: None
-

Customer Impact

1. Estimated number of users/beneficiaries (current and projected): All borough residents (circa 330,000), local businesses and people that work within and visit Bromley.
-

Ward Councillor Views

1. Have Ward Councillors been asked for comments? Not Applicable
2. Summary of Ward Councillors comments: Not Applicable

3. COMMENTARY

Background

- 3.1 The Mayor of London published the London Environment Strategy (LES) in May 2018. Within this strategy is the Mayor's waste management policy, which as a waste collection and disposal authority, Bromley is required to be in general conformance with under Section 355 of the Greater London Authority Act 1999.
- 3.2 The LES is a London-wide strategy and includes a requirement for all London Boroughs to produce a Reduction and Recycling Plan (RRP), which demonstrates they will deliver the Mayor's waste management objectives including:
- Providing a minimum service level for household recycling collection services, which includes a weekly food waste collection, and collections of paper, card, plastic bottles, plastic containers, glass and cans;
 - Contributing to the London targets of:
 - Sending no biodegradable or recyclable waste to landfill by 2026
 - Recycling 50% of local authority collected waste (LACW) by 2025
 - Making best use of local waste sites identified in local waste plans;
 - Supporting the phase out of fossil fuel waste transport and boost uptake of low or zero emission alternatives;
 - Procuring waste and recycling services that maximise local economic, environmental and social benefits and demonstrating how these services deliver the Mayor's Responsible Procurement Policy.
- 3.3 The LES recognises that some Boroughs will need to achieve higher levels of recycling to compensate for those who, due to local circumstances will be unable to achieve these levels, for example, boroughs with high numbers of flats.
- 3.4 The Mayor of London has not provided any additional funding to assist boroughs in achieving the waste management requirements set within the LES and recognises that pressures on local authority budgets in many instances has reduced investment in waste and recycling collection services.

Bromley Council's RRP

- 3.5 Bromley Council has a long tradition of providing high performing waste management services. Waste is managed as a resource, with a focus on minimisation and reuse through local behaviour change campaigns and the delivery of a comprehensive recycling service. Bromley was the third London borough to introduce compulsory recycling and has always had a producer pays approach to managing waste. As a result, Bromley is achieving many of the waste management objectives set by the LES and with the third highest recycling rate in London is already contributing more than many boroughs to the London-wide recycling rate. Table 1 below was provided by Resource London to demonstrate Bromley's performance against its nearest neighbours.
- 3.6 Bromley's waste strategy is encompassed in two Council documents; Building a Better Bromley, which outlines the guiding principles and corresponding aspirations for the Council, and, the Annual Environment and Community Services Portfolio Plan, which sets the Council's environmental service aims and objectives and includes an aim to manage waste sustainably. The RRP will complement these by documenting the actions that the Council will take to minimise and recycle waste from Bromley's households and businesses.

Table 1 – Bromley Council’s 2017/18 Waste and Recycling Performance compared to Nearest Neighbours

	recycling rate (%) 2017/18	kg/hh/yr residual 2017/18	Service profile			
			Refuse	Recycling	Food waste	Garden waste
Bromley	50	454.1	Fortnightly, bags	Alternate weekly, twin stream (fibres separate), boxes	Weekly separate	Fortnightly charged
Sutton	50 (0.0)*	434.2 (-19.9)*	Fortnightly, 140l bins	Weekly, twin stream - fibres separate, bin and boxes	Weekly separate	Fortnightly charged
Hertsmere	43.6 (-6.4)*	507 (+52.9)*	Fortnightly bins	Alternate weekly, twin stream (fibres separate), bins	Fortnightly mixed organics	
Epsom and Ewell	49.9 (-0.1)*	467.5 (+13.4)*	Weekly, 140l bins	Weekly: bin for fibres/plastics/cans; box for glass; weekly textiles in bag	Weekly separate	Fortnightly, charged
Brentwood	44.4 (5.6)*	476.7 (+22.6)*	Weekly sacks (although they will empty a resident-bought bin)	Weekly sack fibres/plastics/cans; fortnightly glass in box/ fortnightly textiles in sacks	Weekly separate	Fortnightly, charged
Three Rivers	62.4 (+12.4)*	337.6 (-116.5)*	Fortnightly, 140l bins	Weekly, fully co-mingled in bin	Weekly separate	Fortnightly, charged

3.7 Bromley’s Draft RRP for the period May 2019 to December 2022 is presented in Appendix A. The first section of the RRP is a dashboard, which presents Bromley’s current and planned performance against the following set of metrics and targets, most of which are already reported locally through the Council’s Portfolio Plan:

- Total annual household waste collected per head
- Total annual household residual waste collected per household
- Total annual household avoidable food waste collected per head
- Household recycling rate
- Local authority collected waste recycling rate (includes commercial waste)
- Percentage of households that are offered the Mayor’s core recycling services
- Percentage of vehicles that are Ultra Low Emissions Zone compliant

3.8 The second section sets out the actions that Bromley plans to take to meet the planned local targets under the following headings:

- Waste Reduction
- Maximising Recycling
- Reducing Environmental Impact
- Maximising Local Waste Sites

3.9 The Council commenced a suite of environmental contracts on 1 April 2019 including Lot 1 (waste disposal), Lot 2 (waste collection) and Lot 3 (street environment). As part of the implementation of these contracts a number of proposals were outlined to assist the Council to minimise waste, recycle more and reduce carbon emissions. Some of these proposals have already been implemented, for example, the introduction of a recycling collection service for small electrical items, textiles and batteries. These actions are captured in the action plan to document all steps taken to work towards the RRP targets.

3.10 Key actions within the RRP that will be undertaken to enable the Council to minimise waste, maximise recycling and reduce the Council’s impact on the environment over the next three years include:

- Delivering virtually 'zero waste' to landfill, 2% by 2020/21
- Increasing the number of green garden waste subscriptions to 32,000

- Continuing to conduct waste minimisation and recycling campaigns with a focus on plastic reduction, food waste recycling, recycling within blocks of flats and reducing contamination
- Working towards delivering a fully electric waste and recycling vehicle fleet and ensuring vehicles meet ULEZ requirements
- Maximising the use of local waste sites by promoting recycling and reuse at the Waldo Road and Churchfields Household Recycling and Reuse Centre

3.11 To enable the Council to meet some of the aspirational LES targets, which focus not only on household waste but also on business waste that is collected and managed by the Council, the RRP also includes several actions for consideration. These actions include:

- Realigning the garden waste collection service schedules to enable further growth
- Piloting a flats recycling collection scheme
- Introducing a comprehensive commercial and schools recycling service
- Restricting household residual waste capacity
- Changing the collection methodology for paper and card recycling
- Managing Council office waste more sustainably

3.12 Further exploration of these actions will take place in 2020/21 to consider the extent to which they are able to contribute to the Council's targets, their financial viability and the potential impacts to residents and businesses. There is a risk that financial constraints may prevent some of these actions from being progressed and as a result the targets set in the RRP may not be achieved.

4 IMPACT ON VULNERABLE ADULTS AND CHILDREN

4.1 Waste collection services affect all residents including vulnerable adults and children.

4.2 The consideration of any additional impacts on particular groups of residents is taken when making changes to the waste collection service. Therefore, the potential impacts on vulnerable adults and children and mitigation measures will be considered before implementing specific actions within the RRP. Mitigation measures may include the consideration of how to ensure that communication materials are accessible to all.

4.3 During the September 2019 waste collection service change, which is one of the actions listed within the RRP, the following actions were taken to minimise the impact to households with vulnerable adults and children:

- Ensuring the Special Requirements List was up to date
- Communicating clear messages through a variety of communications channels and using pictures wherever possible
- Listening to and learning from feedback received

5. POLICY IMPLICATIONS

5.1 Bromley's RRP seeks to complement the Council's corporate environmental policies.

5.2 The adoption of the RRP will contribute to the "Building a Better Bromley" objective of maintaining a safe, clean and green environment. Excellent Council refers to the Council's intention to provide efficient and effective services and value for money to our residents. RRP actions that focus on minimising waste will assist the Council in reducing the cost of the waste management service.

5.3 The actions set out in the RRP will contribute to the Environment Portfolio Plan Priority to Minimise Waste and Increase Recycling.

- 5.4 The RRP is required to demonstrate Bromley's general conformance with the Mayor of London's waste management policy.
- 5.5 The Government's Resource and Waste Strategy for England 2018 could alter the way in which local authorities manage waste in the future. Within the strategy the Government set out their plans to implement an Extended Producer Responsibility scheme, Deposit Return Scheme and provision of consistent household and business recycling and waste services. Initial consultation was conducted in spring 2019 and following publication of the results, the Government has committed to further consultation. The Government is considering a system where producers (i.e. manufacturers of products/ retailers) fully fund local authority collection systems and as a result may prescribe the methodology used to collect waste and recycling. Once the Government has confirmed the extent of the changes to local government waste management services, the RRP may need to be updated.

6. FINANCIAL IMPLICATIONS

- 6.1 The existing Waste Services revenue budget for 2019/20 is £17.9m.
- 6.2 There are no direct additional costs of producing the Reduction and Recycling Plan. However, the Plan sets out proposed actions for future consideration that potentially would have financial implications.
- 6.3 As stated in 3.11, further exploration of these actions will take place in 2020/21. This will need to include detailed business cases to examine their financial viability and affordability given the continuing constraints on the Council's resources.

7. PERSONNEL IMPLICATIONS

None. Actions identified within the RRP will be conducted by the Neighbourhood Management team as part of their existing roles.

8. LEGAL IMPLICATIONS

- 8.1 This report is the pre-decision scrutiny of the Councils Draft Reduction and Recycling Plan (RRP). The Council is required to have a Reduction and Recycling Plan. The RRP is required to demonstrate Bromley's general conformance with the Mayor of London's waste management policy.
- 8.2 The Greater London Authority Act 1999 S 355(1) requires each of the waste collection authorities in Greater London, in exercising any function under Part II of the Environmental Protection Act 1990, to act "in general conformity" with the provisions of the London Environment Strategy ("the Strategy") dealing with municipal waste management. 5.4.3 Section 355(1) is, however, subject to section 355(2). This provides that section 355(1) has effect only to the extent that compliance by an authority with its requirements does not impose excessive additional costs on the authority. The provisions of sections 356(1) and 356(4)(a) require to be read in the light of those of sections 355(1) and 355(2).
- 8.3 As detailed in the report, in May 2018 the Mayor of London published the London Environment Strategy (LES) and one of the requirements from this is that the Council has to produce a RRP. No additional funding has been provided for these requirements.
- 8.4 The new environmental contracts entered in to by the Council on 1 April 2019 reflect the LES and support the RRP targets.
- 8.5 The RRP also compliments the Council own environmental policies and supports the Councils own agenda of "Building a Better Bromley".

- 8.6 As detailed in the report in Section 6, any future requirements which may require expenditure will have to be considered on a case by case basis and follow current contractual arrangements and procurement procedures.
- 8.7 The Council is required to have RRP and this report seeks approval for the RRP; thus, allowing the Council to comply with and deliver its legal obligations.

9. PROCUREMENT IMPLICATIONS

- 9.1 None. There are no procurement implications at this stage.

Non-Applicable Sections:	Not Applicable
Background Documents: (Access via Contact Officer)	Not Applicable

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Key actions – core service provision	Key actions – behaviour change activities	Expected impact towards achieving local targets	Key milestones (including progress updates)
<p>Continue to work with contractor through regular contract meetings to ensure that Lot 1 (Waste Disposal) contractual targets of 14% to landfill in 2019/20 and 2% to landfill are achieved.</p> <p>Residual waste to be diverted to Kemsley Energy Recovery Facility, South East London Combined Heat and Power facility and Refuse Derived Fuel facilities in Greenwich and Kent.</p>	<p>Work with contractor to ensure that Waste Transfer Staff use the 360 plant to remove bulky items and salvage recycling from residual waste brought to site to enable more residual waste to be diverted.</p>	<p>Reduction in the tonnes of CO2eq per tonne of waste managed.</p> <p>Increase recycling of residual waste as some elements can be recovered at the alternative treatment facilities.</p>	<p>Landfill diversion is monitored at monthly contract management meetings.</p>
<p>Continue to work with Straight Plc, and Get Composting to offer discounts to residents that wish to take up composting at home.</p>	<p>Review and adapt the information provided through our website to promote the home composting scheme and provide advice on how to home compost.</p> <p>Encourage residents to join the home composting scheme through Environment Matters newsletter and outdoor advertising.</p>	<p>Reduction in the amount of food waste disposed of per household.</p> <p>Contribution to reduction in total household waste produced per person.</p>	<p>Review of the promotion of the home composting initiative in March 2020.</p>
	<p>businesses to reduce the amount of waste and especially food and plastics that they produce through messaging within environment matters, digital marketing and presentations to community groups and schools.</p> <p>Consider options for the promotion of reusable nappies.</p> <p>Seek funding opportunities for comprehensive waste minimisation campaigns.</p>	<p>Reduction in the total waste produced per person.</p>	<p>Annual review of the communications strategy.</p> <p>Review of reusable nappy promotion options by September 2020.</p>

Consider options to restrict residual waste capacity for houses including the provision of a 180 litre wheeled bin.		If the implementation of a solution to restrict residual waste is financially viable it will reduce the amount of residual waste produced per household.	Exploration of this option to take place in 2020/21, with a view to implement in 2021/22.
Reduce plastic bottle consumption by working with Refill London and The Councils Business Improvement Districts (4 in total) to galvanise local businesses to promote reuse schemes.	Work with BID managers, local businesses, campaigns and promotions for public awareness. Promote a cultural change at the Council's offices and buildings to lead through setting an example.	Number of businesses signed up to the Refill London scheme. Reduction in the amount of LACW plastic waste - tentative figures of plastic reduction can be extrapolated from the Refill app. Contribute to overall reduction in household waste produced per person.	Signing up businesses within the business improvement district will be ongoing but monitored on a monthly basis.
Reducing waste as feasibly possible, including separation for reuse.	Work with sustainability leads to assess areas for reduction, internal campaigns, refills schemes, alternative packaging.	Reduction in waste produced within Council Offices	Progress to be reviewed annually
Update sustainable procurement policy to encourage waste minimisation through contracts and services provided by the council.	Present sustainable procurement policy to Contract Managers. Work with procurement colleagues to embed sustainability within the procurement process.	Reduction in waste produced by Council contracts and services.	Presentation to Contract Manager in February 2020.

London Environment Strategy Objective Reference	Key action – local policy or waste contract commitment	Key actions – core service provision	Key actions – behaviour change activities	Expected impact towards achieving local targets	Key milestones (including progress updates)
7.2 – Maximise recycling rates	Expand the range of materials that can be accepted for recycling	<p>Introduce a weekly kerbside collection for small electrical items (i.e. kettles, hairdryers), household batteries and textiles in September 2019.</p> <p>Continue to work with our contractor to increase the types of materials that can be accepted within our collection services and at the Household Reuse and Recycling Centre</p>	Encourage residents to use the weekly kerbside collection of small electricals, textiles and batteries.	Based on tonnages achieved by other boroughs offering the same collection service, LBB estimate that an additional 42 tonnes will be recycled each year. This represents a small contribution of approximately 0.03% to the overall recycling rate.	<p>16 September 2019 - Implementation of the new collection service for electrical items, textiles and batteries</p> <p>April 2020 - Annual review of the new collection service for electrical items, textiles and batteries and consideration of options to expand to other property types.</p> <p>Annually in April - Review of the range of materials accepted at the kerbside and at the Household Reuse and Recycling Centre for recycling</p>
	Increase the number of households that receive the core set of recycling services including food waste	<p>Introduce a weekly food waste collection to approximately 1,300 narrow access properties alongside an every other week non recyclable refuse collection in September 2019. The new waste fleet enables this due to having a suite of narrower vehicles enabling them to access these properties.</p> <p>Consider the introduction of a flats above shops recycling service in 2019/20 for implementation in 2020/21.</p> <p>Continue to work with managing agents, housing associations and residents associations to introduce the full range of recycling services to the blocks of flats that do not currently have these services</p>	<p>Provide residents that live in 'narrow access' properties with information about how to use their new food waste service along with one free roll of 50 food waste liners.</p> <p>If a flats above shops service is implemented, promotion this service will be required.</p> <p>Engage with managing agents, housing associations, residents associations and residents living in blocks of flats about any expansion of recycling facilities on a block by block basis.</p>	<p>Providing a food waste collection scheme to 'narrow access' properties will mean that 100% of kerbside properties will have access to the core recycling materials including food waste.</p> <p>Use data from our own waste composition analysis to estimate the impact of this change as well as data within the</p>	<p>16 September 2019 - Implementation of the new collection service for electrical items, textiles and batteries</p> <p>January 2019 - Review of contract performance including the implementation of the new collection service.</p> <p>April 2020 - Consideration of the introduction of a flats above shops recycling service as part of the Council's Transformation Programme.</p>
	Increase recycling capacity for houses	Explore options to increase recycling capacity for kerbside properties (e.g. 55 litre box to 240 litre wheeled bin) whilst reducing residual waste capacity (option 7.1.4) in 2020/21. a view to implement in 2022/23. NB. This option will be considered in conjunction with a decrease in residual waste capacity	Consider costs and benefits of a comprehensive communications plan for this potential service change.	Indicative modelling indicated that a recycling rate of 54% could be achieved if wheeled bins were provided both dry recycling services and for the residual waste service. However, this modelling needs to be further tested.	Exploration of this option to take place in 2020/21, with a view to implement in 2021/22.

Recycling promotion		<p>Encourage residents to recycle through articles in the twice yearly newsletter (Environment Matters), e-news letter, website, social media and outdoor advertising. This will be included in the annual communications plan.</p> <p>Provide information about 'What happens to our recycling and waste?' on our website as an infographic that can be used with community groups and schools as a resource.</p> <p>Write a communication plan strategy to increase recycling in flats</p>	<p>Assist in maintaining and increasing recycling rate. The target in the draft communications plan for 2020/21 is to increase household recycling to 51%</p> <p>Increase recycling in flats, which will assist in increasing the overall recycling rate with the plan providing a target for this increase.</p>	<p>March 2020 (and then each March annually) - Annual communications Plan</p> <p>December 2019 (and updates annually) - 'What happens to our recycling and waste?' infographic to be uploaded to website in December 2019, with updates made on an annual basis.</p> <p>April 2020 - Flats communication Plan</p>
Increase sign up to the garden waste service to achieve	<p>Implement a direct debit system for the garden waste service to make signing up easy for new customers and increase retention to the service</p> <p>Consider rescheduling the garden waste collection service to enable additional growth of the service.</p>	<p>Targeted letters to be sent to potential customers to encourage participation in the scheme. This will take place alongside a targeted digital marketing campaign</p> <p>Annual communications plan to include promotion of the garden waste scheme through promotional post cards, adverts, digital marketing, and outdoor advertising.</p>	<p>Assist in maintaining and increasing the household recycling rate. The target in the draft communications plan for 2020/21 is to increase recycling to 51%</p>	<p>October 2019 - Trial of targeted garden waste letters.</p> <p>March 2020 (and then each March annually) - Annual communications plan</p> <p>June 2020 - Decision made at ECS PDS Committee in relation to rescheduling the garden waste collection service</p> <p>September 2020 - If agreed in June 2020, implement garden waste schedule changes</p> <p>2020/21 - Direct debit option to be available for garden waste</p>
Provide a dry recycling service for all households in the borough	Introduce a flats recycling service for 1,367 flats above shops properties	Consider costs and benefits of a comprehensive communications plan for this potential service change.	Increase household recycling rate and contribute to the 51% target for 2020/21	<p>June 2020 - Decision to be made relating the introduction of a flats above shops recycling service pilot.</p> <p>September 2020 - Pilot flats above shops recycling service.</p>

			Continue to provide site visits for schools at Waldo Road Household Reuse and Recycling Centres. Annual communications plan to include the offer of talks to schools by the waste contractors communications resource. Promote new recycling service to schools.	Increase household recycling rate but at this stage no modelling has been completed and therefore cannot impact cannot be estimated.	September 2020 - Decision to be made by ESC PDS Committee regarding whether to expand the schools recycling service. April 2021 - If agreed, expand the materials accepted through the schools recycling scheme
Increase schools recycling	Expand on the existing paper and card recycling scheme by introducing a recycling service for other dry recycling materials Consider the introduction of a schools food waste collection service				
			Consider costs and benefits of a comprehensive marketing plan for the promotion of a commercial recycling service	The benefits would be to significantly increase the LACW recycling rate but the impact has not modelled at this stage.	September 2020 - Formal decision to be made regarding whether to implement this option.
Commercial recycling provision	Explore options to enable the provision of a commercial recycling service.				
			Write a contamination reduction plan and implement	Reduction in contamination will lead to an increase in the household recycling rate. However, the impact has not been measured at this stage.	March 2020 - Provide tackling contamination plan within the annual communications plan. April 2020 to March 2021 - Implement contamination plan
Contamination reduction initiative	Continue to implement the Council's contamination procedure.				
			Work with the planning team to promote the guidance document.	Assist in maintaining recycling rate and enabling increases by ensuring there is adequate space for recycling containers	September 2020 - Development of property guidance on recycling and waste storage
Waste Storage Advise for new planning applications	Produce guidance for property developers about how waste should be stored and the number of containers required for waste and recycling				
			Promote the internal recycling scheme through information on the intranet and staff e-news.	Increase recycling from council offices and contribute to the LACW recycling rate. At this stage the contribution has not been assessed.	September 2020 - Expansion of the Civic Centre recycling scheme
Increase recycling at Council Offices	Expand the existing recycling scheme at the Civic Centre to include the same recycling materials offered to kerbside properties Consider the introduction of a food waste recycling scheme at the Civic Centre				
			Promote recycling to Bromley market stall holders.	Increased LACW recycling rate.	December 2020 - Formal decision on options for recycling at Bromley market
Explore recycling at Bromley market - revised market policy 2020.	Consider options for introducing a recycling scheme for Bromley Market				
			Communications will continue to remind people what the service is and how to use it correctly.	Maintain existing household recycling rate and increase it wherever possible.	The recycling service will be reviewed annually.
Continue to offer comprehensive recycling collection service	Work with contractor to maintain high quality recycling collection service.				
			Encourage residents to keep paper and card dry during the storage in between collections.	Maintain existing household recycling rate and potentially increase it.	September 2020 - Decision to be made by ESC PDS Committee regarding potential solutions to maximise the recycling of paper and card.
Maximise paper and card recycling	Repair Waste Transfer Station paper bay to reduce the potential for paper and card to become wet in storage. Explore options to ensure that paper and card recycling is kept dry during collection and storage.				

London Environment Strategy Objective Reference	Key action – local policy or waste contract commitment	Key actions – core service provision	Key actions – behaviour change activities	Expected impact towards achieving local targets	Key milestones (including progress updates)
7.3 – Reducing environmental impact	Update Bromley's Sustainable Procurement Policy that includes guidelines for considering circular economy principles within the procurement process and examples of circular economy evaluation criteria.	Trial the use of the circular economy evaluation criteria in a small scale procurement project with the purpose of upgrading it.	Work with procurement colleagues and other members of staff conducting procurement exercises to embed the updated Sustainable Procurement Policy	The Sustainable Procurement Policy will assist the Council in reducing the amount of waste produced internally and also by contractors delivering services across the borough. However, at this stage it is difficult to provide an estimation of the level of this impact.	March 2020 - Updated Sustainable Procurement Policy delivered September 2020 - Circular economy evaluation criteria trial April 2021 - Training on Sustainability Procurement Policy to be delivered
	Appoint a Circular Economy Champion to lead on embedding circular economy principles within Bromley Council and the services that we provide	Provide supplementary guidance for budget holders and service leads. Design, test and refine sustainability and circular toolkit to build sustainably and circularity into the procurement process.	Use the appointment of a Circular Economy Champion to provide a members briefing on circular economy to increase awareness of how the benefits of circular economy principles to the Council.	The Circular Economy Champion will assist the Council in reducing the amount of waste produced internally and also by contractors delivering services across the borough. However, at this stage it is difficult to provide an estimation of the level of this impact.	April 2019 - Circular Economy champion appointed
	Commit to delivering a ten year plan to meeting the Council's target to have net zero carbon emissions by 2029. Draft, approve and deliver net zero carbon emissions plan including tree planting, an energy efficiency programme, expanding renewable energy and LED street lighting, internal council plastic reduction campaign and other initiatives.	Business cases with various sources of funding including S106 payments, SALIX and/or SEELS 0% interest loans to finance energy efficiency projects and carbon reductions.	Behaviour change campaign will be developed to encourage staff, residents and local businesses to reduce their carbon emissions.	This plan will contribute to reducing LACW, increasing LACW recycling rates and to meeting the EPS target. But at this stage it is difficult to assess the impact.	July 2019 - Commitment to net zero emissions April 2021 - Ten year plan produced

	Work towards delivering a fully electric waste and recycling vehicle fleet and ensuring vehicles meet ULEZ.	<p>New recycling and refuse collection vehicles to be Euro VI compliant and meet ULEZ requirements.</p> <p>Waste collection and street cleaning Environmental Managers (supervisors) vans (seven) to be electric.</p> <p>Installation of electric vehicle charging points as part of the Depot Improvement Programme to futureproof the depot and enable the next waste and recycling fleet to be fully electric.</p> <p>Vehicle tracking installed in waste and recycling vehicles to reduce idling and other activities that go against sustainable transport plans</p>	Training for drivers to include how to reduce vehicle emissions.	<p>Electrifying the fleet will result in improved local air quality and reduced noise pollution. It will also lower the organisations emissions which complement The Council's 2029 commitment.</p>	<p>Euro VI and ULEZ compliant recycling and refuse fleet by April 2020.</p> <p>Electric vans for all Environmental Managers by December 2019.</p> <p>Electric vehicle charging infrastructure to be in place at Waldo Road Waste Site by April 2022.</p>
	Civic Centre - digitalisation of paper documentation	Reduce paper consumption through a technical, cultural and systematic transformation across all business areas of the Council where feasibly possible. Digitise all paper processes as much as possible. Shift to "agile working" to encourage less paper stored on site/ at work stations.	Guidance and internal campaign to communicate changes.	Less paper consumption will reduce end to end costs of procuring paper. This will also lower The Council's organisational emissions.	Annual reduction in paper consumption.

London Environment Strategy Objective Reference	Key action – local policy or waste contract commitment	Key actions – core service provision	Key actions – behaviour change activities	Expected impact towards achieving local targets	Key milestones (including progress updates)
7.4 Maximising local waste sites	Continue to maintain two Household Reuse and Recycling Sites for the use of both residents and commercial customers.	Waldo Road Depot to increase the efficiency at the site and able increased recycling at the site.	Promote the Household Reuse and Recycling Centres as locations that residents can take items for reuse and recycling.	Continue to maintain and increase recycling rate at the Household Reuse and Recycling Centre.	March 2020 - Review the annual communications plan with a view to promoting reuse and recycling at Council Sites.
	Depot Improvement Programme investment to ensure that waste sites are fit for purpose for the 16 year period covered by the Council's suite of Environment Contracts.	<p>Improve the drainage and repair hard standing at the Waste Transfer Station to ensure that it meets the standards that are required by the Environment Agency for this site.</p> <p>Consider further alterations to the design of the Household Reuse and Recycling Centre to assist residents and businesses to maximise recycling and reuse.</p>	<p>Promote the changes made at the Household Reuse and Recycling Centres to assist residents to recycle.</p>	Continue to maintain and increase recycling rate at the Household Reuse and Recycling Centre.	<p>March 2020 - Appointment of consultant to design the improvements to the Council's waste site.</p> <p>April 2021 - Implementation of improvement works.</p>
	Work with our contractor to encourage more re-use at the Household Reuse and Recycling Centres	<p>Contractor to appoint a Recycling Officer to look for opportunities to increase recycling and reuse at the Household Reuse and Recycling Centres</p> <p>Expand the range of materials that can be accepted for reuse and recycling at the Council's HRRC's.</p> <p>Consideration on an online reuse shop using items brought to the Household Reuse and Recycling.</p>	<p>Update recycling signage at the Household Reuse and Recycling Centres to ensure it is clear and assists residents in finding where they can recycle the items brought to the site.</p> <p>Train Household Reuse and Recycling Centre staff on how to increase recycling and reuse.</p>	Continue to maintain and increase recycling rate at the Household Reuse and Recycling Centre.	<p>January 2020 - Appointment of recycling officer by waste contractor.</p> <p>Monthly review of the Household Reuse and Recycling rate.</p>
	Maintain a network of recycling banks where residents can take excess recycling and materials that they are unable to recycle from home	Work with the contractor to maintain the on-street recycling bank service	Continue to promote the use of these sites through Environment Matters and the council's website.	Maintain existing household recycling rate and potentially increase it.	Annual contract review.
	Maintain local waste sites in accordance with the South East London Waste Planning Group technical paper.	<p>Maintain the Council's Waste Transfer Centres at Waldo Road and Churchfields.</p> <p>Continue to liaise with the South East London Waste Planning Group to ensure that the combined waste sites meet the London waste apportionment for the South East London region.</p> <p>Continue to work with the waste contractor to ensure that the Council's waste is treated in accordance with the Proximity Principal.</p>		Reduce the impact of managing Bromley's waste on the environment.	<p>February 2020 - Update of the South East London Waste Planning Group Technical Report.</p> <p>Regular meetings with the South East London Waste Planning Group with updates to the Technical Report made if there are any significant changes to waste sites.</p> <p>Annual contract review</p>

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