

SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL

HEALTH & ENVIRONMENTAL SERVICES



DRAFT

SERVICE PLAN 2010/11 TO 2012/13

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Portfolio Holder/s: Cllr Mrs S Ellington / Cllr T Bygott

Approved:







SERVICE PLAN OVERVIEW

1. Key Functions and Responsibilities

1.1. Profile of Service

Health & Environmental Services (H&ES) takes a holistic view of the interaction of people with their home, work, leisure and natural environment. The essence of the service is the prevention, detection and control of environmental hazards that affect human health, with 'health' defined in its broadest sense as " a state of complete physical, mental and social well-being". It is made up of a very broad and intertwined set of sub-services and activities, many of which are aligned to legislative and regulatory requirements. Environmental and public health is an inescapable part of our daily lives. The task of the service is to lessen the affect of the wider determinants of health i.e. economic prosperity, poor housing conditions, crime, living and working conditions, water and sanitation that impact the individual's health & well-being.

1.2. Key Service Areas

The service can be subdivided into key service areas delivering statutory functions; as detailed in Appendix 1.

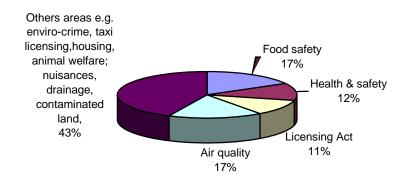
2. Context

2.1. External Drivers

2.1.1. National Enforcement Priorities

For the reasons outlined in Appendix 2, Air Quality (including regulation of pollution from factories and homes); Alcohol, entertainment and late night refreshment licensing and its enforcement; Hygiene of businesses selling, distributing and manufacturing food and the safety and fitness of food in the premises; and Improving health in the workplace have been set as the National enforcement priorities. These are currently under review by Local Better Regulation Office (LBRO) and may well change in due course in the meantime Local Authorities must have regard to these priorities and ensure that sufficient resources are in place to effectively regulate these sectors. Figure 1 demonstrates that appropriate resources are directed towards these national priority areas.

Figure 1: Estimated number of FTE equivalent field staff allocated to national priority enforcement areas as proportion of total field staff employed



2.1.2. Regulatory Reform Agenda

Central to the Country's economic and social goals, is proportionate and effective regulation with an emphasis on securing compliance by advice, assistance, and education whilst appropriately using intelligence and risk based mechanisms to drive inspection and enforcement. Fundamental to this approach is that the majority of

businesses, which are complaint, will receive a lighter touch, meanwhile rogue businesses will be expected to face quick, meaningful and proportionate action and penalties. LBRO's (a statutory body with considerable power over local authority regulatory bodies) job is to provide best practice guidance to local authority regulators and look to drive up performance. LBRO will hold under performing Authorities to account.

H&ES has registered its interest in the Trading Places project where staff from Environmental Health would trade places with managers of business to understand each other's perspectives better. In addition the national Retail Enforcement Pilot has been completed. This project looked to see if the burden on businesses could be reduced by one lead regulator undertaking initial inspections for others at the time they carried out their primary inspection/visit. Evaluation has shown that this did not lead to the anticipated reduction in visits to businesses and businesses did not see inspections as a major cost to them. They welcomed the level of support provided by local regulators in assisting them understand what is required to comply with the everchanging legislation. This view is mirrored in our Business Satisfaction returns.

2.1.3. New Legislation

2.1.3.1. Regulatory Enforcement & Sanctions Act 2008

Part 3 of the above Act provides regulators an extended toolkit of alternative civil sanctions as a more proportionate and flexible response to non-compliance. The power to use these new sanctions will however only be granted by ministerial order following advice from LBRO on whether, in a particular field, local authorities in general are Hampton compliant. To date the necessary ministerial order has not been made. Part 2 of the Act, establishing the Primary Authority scheme, has come into force. To date nationally a small number of businesses have joined the scheme, none in South Cambridgeshire and there are no indications that any will do so.

2.1.3.2. Government proposals following Bristol Report¹

The Government has agreed to a phased increase the mandatory disabled facility grant (DFG) limit from £25,000 to £50,000. In 2008 the limit rose to £30,000 but there has been not trailing of further rises. However, taken together with the demographic changes in Cambridgeshire the capital programme available for DFG's will in future be under severe pressure and is unlikely to be sufficient to meet the demand especially if the programme has to be cut.

2.1.3.3. The Private Water Supplies (England) Regulations 2008

An important policy objective is to ensure that everyone who uses or consumes water from a private water supply can be assured of its quality and safety. The necessary Regulations have been delayed and will come into force in 2010. This will require all of our 139 private water supplies to be individually risk assessed for potential public health impact over a five-year period. Cambridge Water Co. draw water from the same aquifers as these supplies and are interested in a partnership arrangement with H&ES for undertaking the appropriate risk assessment process. Accordingly it is anticipated that this requirement can be met without the need for additional resources.

2.1.3.4. **Guided Bus**

The introduction of the Guided Bus could lead to increases in applications for Taxi licences and the need for the introduction of taxi ranks within South Cambridgeshire.

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¹ DCLG (2007); Disabled Facilities Grant programme: The Government's proposal to improve programme delivery. London. The Stationery Office

2.1.3.5. Licensing Act 2003 Review

The Licensing Act is being changed to meet the requirements of the EU Services Directive and provide the power for the Licensing Officer to instigate reviews. It is also proposed to allow premises with a capacity of less than 100 to have live music without the need for a licence. This could result in increased noise and disturbance resulting in complaints and dissatisfaction. Licensing Authorities have been asked to consider a 'Yellow and Red' card approach to problem premises. A 'yellow card' would mean the imposition of tough conditions visibly displayed in the community and if not complied with result in a premises license being revoked if matters have not improved i.e. under aged sales and/or disturbance issues.

2.1.3.6. The Pitt Review and Floods and Water Management Bill

The Government is pushing Local Authorities hard to implement the recommendations of the Pitt Review and above Bill continues its passage through Parliament. Although mainly a responsibility for the County, Its affects on SCDC could be far reaching especially around the need to produce local surface water management plans; technical and resource capabilities in dealing with and planning for flooding; and responsibility for maintenance of SUDs. The Bill also contains proposal for Water companies to become responsible for private sewers, which will have implications for the service dealing with the public health implications of defective private sewers and resident's expectations. In addition additional workload could result from the suggestion to make surface water run-off a Statutory Nuisance.

2.1.3.7. Housing legislation changes re Caravan Site Licences

Changes to legislation and model conditions attached to caravan site licences relating to the need for fire risk assessments will place additional burdens on staff within H&ES.

2.1.3.8. Health Protection Regulations

Environmental Health Officers (EHO's) have powers to control the spread of infectious diseases. These regulations seek to update these by introducing more flexibility & safeguards especially around Human Rights. As well as certain diseases GP's will now also be required to notify cases of contamination which present of could present significant harm to human health. To protect public health EHO's will be able to obtain an Order imposing restrictions or requirements on individuals and have available to them other powers to contain incidents of infectious disease.

2.1.4. Other External Influences

2.1.4.1. Review of Local Air Quality Management & Introduction of further Air Quality Objectives

A review of the above regime has been commenced to improve air quality outcomes; make better use of resources and recommend further legislative change. The implications of this are unknown at present. A new air quality objective for $PM_{2.5}$ and an exposure reduction approach is being considered. Progress of these proposals will need to be monitored throughout the year.

2.1.4.2. Scores on the Doors - National Scheme

The Food Standards Agency is consulting on a national Scores on the Door's scheme. Although similar to the scheme at SCDC their proposals do include some important differences that will have o be taken into account.

2.1.4.3. HGV Safety Markings

Legislation is being introduced to require reflective borders to be placed on the sides and rear of the Council's HGV's by the end of 2010 at an estimated cost of £5,000.

2.1.5. Local Demands

2.1.5.1. Housing Growth & Demographic changes

Substantial downturn in the housing completion rate has occurred in 2009/10. The District will still see its population grow from 140,500 in 2007 to 169,800 by 2021but the rate of growth has slowed. As a result the need for further investment in for example refuse collection vehicles will be able to be put back from that anticipated However, growth has already exerted pressure on services and budget increases in the refuse and recycling service will be required in 2010/11 to deal with these. Alongside the population growth commercial and public facilities will also be needed to service the greater population. The new town of Northstowe will look and feel different to any other settlement in South Cambridgeshire and may require a different service delivery model from that provided today.

South Cambridgeshire has an aging population. In future the percentage of children and young people in the District is forecast to decrease and the percentage of over 65's increase. In the 2008 place survey 23% of respondents described themselves as having a long term illness, disability or infirmity, with 38% of these saying this limited their daily activities. This is likely to have a differential impact, increasing demand, on some of our services especially around nuisance complaints; assisted collections, clinical waste collections and disabled facility grant referrals.

2.1.5.2. Commissioning Review of Home Improvement Agencies

Supporting People in Cambridgeshire have initiated a commissioning review of the Home Improvement Agencies across Cambridgeshire, which may lead to the progression of a shared service or a tendering process for HIA services in Cambridgeshire and possible savings to the Council through efficiency gains.

2.1.5.3. Activity Demands on the Service

As exampled by the food control statistic (Appendix 3) we are seeing a gradual increase in the number of commercial establishments requiring control. This growth can currently be accommodated within existing resources following efficiency improvements agreed from changes to the regulatory regime allowing environmental health practitioners to deal with low risk premises by alternative strategies other than by inspection. However the ability of the service to meet the demands placed on it will be severely affected by the budget cuts recently announced for 2010/11.

Reactive activity across the various service areas (Appendix 3) remains reasonably stable, except in refuse and recycling where the number of requests for service is declining. The large increase in activity in 2004/05 coincides with the changes made to the refuse and recycling service.

2.1.6. Cambridgeshire's Local Area Agreement and South Cambridgeshire's Community Strategy /LSP Objectives

The Cambridgeshire LAA includes targets where Health & Environmental Services will have a considerable contribution to make especially surrounding anti-social behaviour, business satisfaction with regulatory services and public health matters around smoking, obesity, alcohol and health inequalities. H&ES policy areas also contribute to a number of proposals with the Sustainable Community Strategy (SCS) of the LSP. Targets and proposals of direct relevance in the Cambridgeshire Together Local Area Agreement and the SCS are listed in Appendix 3.

2.1.7. Making Cambridgeshire Count

Cambridgeshire public service providers have embarked upon an ambitious change project to redesign services outside of traditional structures and organisational boundaries with the aim improve efficiency and services generally whilst reducing costs.

This work has only just begun and outcomes are unclear at present. It is anticipated however that this will have substantial implications for the services provided by H&ES and will require staff within the service to devote time towards working up and the implementation of agreed proposals.

2.1.8. Strategic Review of Recycling and Waste Management

The strategic review of waste and recycling services has resulted in agreement to reconfigure the service provided, based on a two stream co-mingled recycling service alongside the existing alternate weekly green and black-wheeled bins, which will lead to an enhanced level of service to users at substantially less cost than the existing service. This change will require prioritisation of staff time towards its implementation, including procurement, communication, TUPE transfers etc. In addition the service will require a larger depot facility. Discussions have commenced with a neighbouring authority regarding possible efficiency gains through the sharing of depot facilities and spare vehicles.

2.1.9. EU Service directive and M3

The introduction of the Directive together with the new M3 workflow system, replacing Proactive will provide an opportunity to consider how the service can become more efficient through the introduction of mobile working. A business case will need to be produced in 2010/11 to justify any investment required.

2.1.10. Public Service Cuts

Following the recession and the Country's need to repay its substantial levels of debt public sector will be required to make substantial savings. Members have agreed to cut £1.6M from the Council's General fund in 2010/11. H&ES will have to find its part of these savings, which will inevitably mean loss service and hit performance. Funding streams for the Council's Capital programme are predicted to dry up after 2010/11 making the current programme unsustainable. The impact of this have yet to be agreed but it is likely that discretionary spend will cease resulting in the Council no longer being able to implement its Private Sector Housing Strategy and having to stop the provision of Cat1 Hazards loans; replacement boilers and solar hot water grants; and Housing Repair Grants.

2.2. Key Partners

Key partners are wide ranging, involving joint contracting and partnership working through shared services, staff and 'virtual' approaches. An audit of key strategic/high level external partnership arrangements has been undertaken. The RECAP waste partnership has been ranked in the top ten council partnerships. It has achieved Beacon Status and has been extremely successful in ensuring the best value for the council taxpayer of Cambridgeshire. The Improving Health Partnership and the Countywide Community Well-being partnerships, under the LSP and LAA structures respectively are also seen as key partnerships. Other key partners are listed in Appendix 4.

2.3. Internal Drivers

The Council continues to undergo a period of substantial change. A number of corporate and countywide initiatives will have a substantial bearing on the way the service is delivered i.e. customer service excellence, performance management, equalities, climate change. Coming on top of those found in previous years, substantial savings for the service are looked for in 2010/11, which will impact on this on the services' ability to perform to the same standards in the past.

The Members have published their Vision, Aims, Approaches, Actions and Values for 2010/11 onwards. Those that have a direct relevance to Health & Environmental

services are included in Appendix 5. The Councils' values are relatively new but staff are already acting on these and altering behaviours to embed them. Specific actions around customer service and commitment to improving services are included in this plan.

2.4. Service Objectives

As detailed in section 1.1 the service is made up of a broad set and intertwined set of sub-services and activities. Staff within each of these services have considered the objectives of each of their services and how they can be brought to together in one overall Statement of Purpose for Health & Environmental Services. In so doing they have ensured that the Statement of Purpose below reflects and fully embraces the Council's new 3A's (Aims, approaches and Actions) as in Appendix 6. The service values also reflect those of the Council overall.

3. Strengths and Weaknesses

A SWOT analysis has been undertaken taking into account the external and internal drivers and performance of the services.

Table 1: Main Strengths, Weaknesses, Opportunities and Threats

Strengths:

- Customer focus
- Resident, user & business satisfaction
- Emphasis on the national enforcement priorities
- Risk based approach adopted
- Refuse and recycling performance
- Core EH Performance
- Value for Money services
- Partnership working
- Abandoned vehicle removal
- Investors in People accreditation
- Beacon status
- Professional, trained & skilled workforce
- Low level staff sickness in EH
- Ability to access external funding
- Flexible staff
- Scores on the doors
- Nationally recognised experts

Weaknesses:

- Website information and navigation
- Cleanliness after collection
- Staff employed on core Env Health functions per 1000 population
- Recruitment & retention of EHO's.
- Management capacity
- Home Improvement Agency staffing resources to meet demand
- Dog control service
- Up to date Private sector stock condition information
- Long term sickness levels in Environment operations

Opportunities:

- Enviro-crime website enhancements
- Community strategy objectives
- Local Better Regulation Office
- Housing and population growth and demographic changes
- Commissioning review of HIA
- Efficiency requirements
- · Flexible and mobile working
- Waste collection strategic review
- Closer working with Business sector
- Customer Excellence
- Making Cambridgeshire Count
- Reconfigured refuse & Recycling service

Threats:

- Staff/EHO ratio per 1000 population
- Local Better Regulation Office
- Government's response to Bristol report into DFG's
- Housing and population growth and demographic changes
- Budget cuts
- Naming and shaming
- New software solution not performing
- Making Cambridgeshire Count
- Depot size
- Economic downturn impacts
- Capital programme cuts

- Keeping customer informed and providing full explanation on completion of complaint/enquiry
- Pitt Review and Floods and Water Management Bill
- Health protection legislative changes

4. Progress/Performance Overview

4.1. Overall Performance against Best Value Indicators and Local Indicators

The service's performance benchmarked against the national performance indicators together with performance trends against local performance Indicators is given in Appendix 12. Performance has improved in a number of notable areas from last year, especially around recycling; vacancy rate; abandoned vehicles; contaminated land; street cleanliness and customer service.

Performance	nance Functions		
Good	 amount waste recycled/composted & residual waste per house Waste/recycling collection and core EH value for money Licensing; Pest control and core EH performance Satisfaction with street cleanliness and waste & recycling Staff sickness & vacancy rate in EH 		
Average	 Cleanliness after refuse/recycling collections Dry recycling percentage of total weight collected Cost of waste collection services 		
Poor	 Home Improvement Agency time taken to complete works Visible graffiti and fly-posting Awareness of civil protection arrangements 		

4.2. Customer Consultation & Satisfaction

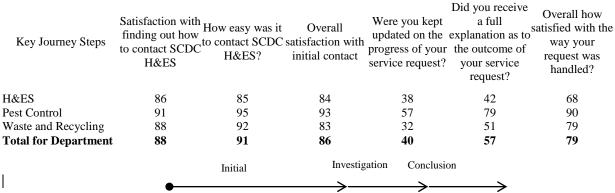
Overall the service has seen some significant improvements in customer satisfaction and perceptions as detailed in tables in Appendix 8. The methodology used in the latest survey was considerably different from past surveys making comparisons problematical. Generally The Place Survey results present a good picture, with satisfaction levels high. Customers commented that many services had got better especially around recycling and refuse collection services and keeping the district clean and free of waste. Despite this an important proportion still felt that rubbish and litter lying around was a problem and felt it important to maintain clean streets. Areas to watch are cleanliness of the street after collections and frequency of emptying at recycling sites. Improvements in both of these should result from the introduction of the re-configured waste and recycling service in October 2010.

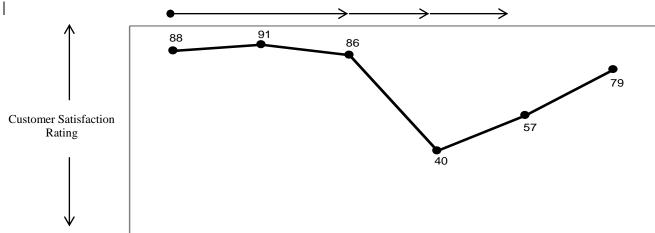
In 2009 compared to other Districts in the County SCDC residents did not consider antisocial behaviour issues to be such a problem for them and that these had continued to reduce from those experienced in 2003 and 2006.

Plotting the customer journey as in figure 2 shows that greater attention and effort is required in keeping the customer informed and providing them with a full explanation on the completion of their compliant/enquiry.

Business satisfaction levels (Appendix 8 Table 3) are excellent with results at 98% plus in most areas. NI182 results are towards the top end of benchmarks.

Figure 2: Customer Experience Journey





5. Budget and Expenditure

20010/10 costs Health & Environmental Services
£
Capital

Revenue
Expenditure
Employees
Premises-related expenditure
Transport-related expenditure
Supplies and services
Third party payments

Income

6. Value for Money Overview

Expenditure per head in 2008/09 (Appendix 9) for all three of the major services was well below the comparative group averages i.e. Waste collection 10th lowest of 16, street cleansing lowest of 16 and environmental and public health services 2nd lowest of 16.

Table 2 Expenditure 2008 compared to all Districts and SPARSE Authorities²

Expenditure on services per head	South Cambs	Rural- 80 ³	SPARSE authorities	All Districts
Street Cleaning	£5.30	£7.99	£8.32	£9.71
Waste Collection	£21.48	£23.16	£22.81	£22.29
Environmental & public health services	£9.08	£13.76	£13.06	£12.44

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Authority spending 20% less than average	Authority spending 0-20% more than average
Authority spending 0-20% lower than average	Authority spending 20% more than average

Net expenditure per head on core Environmental Health functions in 2007/08 was substantially below the benchmark groups as in Table 2 and Appendix 9. Given the reasonably good performance of the service against this low level of expenditure the service can be said to offer good value for money. Figure 7 (Appendix 9) demonstrates that net expenditure has fallen since 2005/06. The gap between the national average and SCDC's net expenditure has widened and remains substantially below the national average figure. With further cuts being implemented in 2010/11 this trend is set to continue and will undoubted start to affect performance.

The SPARSE group of authorities has, as detailed in Appendix 9, undertaken a Value for Money comparison for waste and Recycling services. In 2007/08 the service achieved top quartile performance at below average cost. The implementation of the re-configured refuse and recycling service should see this performance not just maintained but improved especially as the service is likely to be even more cost effective, moving well below average cost. As far as table 2's comparison is concerned, it is anticipated that the expenditure on the service per head will move to be 20% less than average.

6.1. Efficiency Measures and Proposals for Savings

H&ES has a track record in identifying and implementing efficiency and cost savings. The ability to do so is however getting increasingly difficult. As a direct result of the recession and the level of public debt SCDC has identified the need to make a further £1.6M of savings in 2010/11 and H&ES has be required to find £190,000 of this amount. In order to find these savings the service will:

- Increase pest control income through continuing to provide the service for East Cambridgeshire DC and re-using materials where possible.
- Not undertake the planned private sector house condition stock survey
- Increase a selection of fees and charges by 6%
- Undertake the NI195 assessment process with in-house resources
- Reductions in trade waste service costs.

² SPARSE performance Service from RA Forms 2008

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³ Rural-80: the average of 51 authorities who have over 80% of population classified as rural

- On the expiry of the contract, undertake the collection from paper banks using in-house capabilities.
- Reduce the hours of a position within Licensing
- Introduce a charge for environmental information provided where this involves officer time to obtain.
- Efficiency savings expected to be attained through the HIA commissioning review.
- Make savings in internal health & safety budget via various cutbacks.
- Possible sharing of depot with neighbouring authority
- Removal of staff benefit in paying for a professional body subscription
- Reductions in training budgets

In addition to this the reconfiguration of the refuse & recycling service is anticipated to save the council a further £473,000 in year three of the new service. If found this will mean that H&ES will have removed over £1.65M from its budgets since 2005/06. Further efficiency improvements and savings will also be considered through the business case for mobile working, use of text messaging and e-mail messaging; standardising the specification for over-bath showers; investigation of joint procurement of fuel with RECAP partners; refuse collection rounds efficiencies; licensing consumable supplier. Substantial savings may also accrue through the Making Cambridgeshire Count initiative.

7. Workforce Overview

7.1. Training

Spending on training within the service as a percentage of the total environmental health salary budget has fallen to approximately 1%. The low vacancy rate is one reason for the low spending on top of the fact that many of the staff have completed their required training programmes. Training spend may need to rise to accommodate the re-deployment of staff as a result of the spending cuts in 2010/11. Further training will be required to deal with the legislative and other external pressures highlighted in section 2. As part of its succession planning strategy the service will continue to provide in house training schemes to development its own work force i.e. student EHO's, HGV driver training; CPC driver training etc.

7.2. Staff Sickness and Vacancy Rate

Staff sickness excluding environment operations remains relatively low 1.5%. Sickness in environment operations, via good management techniques, dropped substantially from 11% – 12% to around 5% but in 2008/09 has risen again (mainly due to long term sickness) back to 9%. Management has been asked to maintain their focus on reducing this. The vacancy rate has dropped to approx. 2%. The recession has help in increasing the pool of labour available for HGV drivers and street cleansing operatives especially, however the recruitment of qualified EHO staff remains problematical. The age profile of the work force has become more balanced with less coming close to retirement however there are still a number of employees expected to retire in the next few years that will need replacing.

7.3. HGV Drivers Hours restrictions

Government is looking to remove the driver hours exemptions available to local authority HGV drivers. If implemented then Tacho-graphs will have to be fitted to the HGV vehicles and drivers will be required to take a 45 minute break after 4 hours. The cost and inefficiency implications of such a change would be substantial.

7.4. Staffing Benchmarks

H&ES employs less staff per 1000 population on core environmental health functions than our comparative local authority groups. The rate of staff and EHO's employed on

core environmental health functions per 1000 population have remained relatively static (Appendix 10). The pace of population growth in the district is uncertain however in order to ensure that this gap does not grow further field staff will need to be employed in future years.

8. Are we meeting the needs of all our Community? 8.1. Equalities

SCDC has made a commitment to reach the achieving level of the new Equality Framework by June 2010. Health & Environmental Services has carried out EqIA's for all its high and medium risk services. In 2010/11 the service will focus on low risk EqIA's for enforcement policy, out of hours service, environmental complaints, pest control, street cleansing, emergency planning and awarded watercourses as well as ensuring that all new policies or service changes have an EqIA undertaken. In addition the service was successful in bidding for funding from the governments Migrant Impact Fund to combat overcrowding in Houses in Multiple Occupation. This work will be taken forward into 2010/11.

8.2. Safeguarding of Children & Young People

H&ES is committed to the safeguarding of children and young people and will ensure that all staff are aware of the need to be vigilant and can easily and quickly report any concerns about the safety or well being of a child or young person to a designated officer. Managers throughout the service will give the safeguarding of children and young people a high profile and where appropriate specific actions are included in operational plans for relevant service areas.

9. Risk Overview

The H&ES risk register is attached at Appendix 13. This provides an analysis of the major risks affecting the service over the next 12 months and is built from much of the preceding commentary. The greatest risks to the service revolve around depot size, management capacity, IT infrastructure, and tendering processes. Actions have been proposed to reduce and manage these risks within the change and improvement plans that follow. The links to these are shown in table 3.

Table 3: Actions proposed to manage the identified risks To be completed when risk register reviewed 12th Nov.

Risk Number	Short Title/description	Action/Change/Improvement proposed	
			Continue discussions on possible depot move and bid for moving costs in 2010/11
13	Depot size		Pedestrian/ vehicle separation works implemented
			Dependant on outcome of Housing
		•	futures and PFI project works. Additional permanent refuse collection rounds delayed
<mark>15</mark>	Staff perception of a Council wide privatisation agenda		Improved local Communication with staff involved
<mark>16</mark>	Management Capacity to meet demands	•	Senior management informed
11	Meeting air quality A14 corridor	•	Implementation of air quality strategy Agreement and implementation of air quality action plan for A14 corridor

Risk Number	Short Title/description	Action/Change/Improvement proposed
<mark>21</mark>	Savings requirement	 Managers considering proposals which will be individually risk assessed
10	Disabled facility grant demand	 Bid to re-instate post of Assistant Surveyor in HIA unit Assessment of the existing capital budget provision indicates this should be sufficient until 2011/12 Risk of increased mandatory limit receding in short term

For risks see Can we meet the challenges

- Aging workforce
- Moral due to job insecurity
- Police pulling out of out of hours stray dog service
 Veolia reduced performance at end of contract

- Drivers CPC and drivers hours
 MBT plant lack of public undered MBT plant lack of public understanding