Local Pollution Control Statistical Survey 2013/14: Headlines

| Permitted installations |
|---|
| 1 er mueu insulutions |
| • 17,787 [17,930] \rightarrow Part B and 355 [361] \clubsuit A2 permitted installations as of 31st March 2014 |
| 169 [175] I local authorities regulate A2 installations |
| Applications and decisions |
| ■ 481 [424] ↑ Part B applications received and 484 [434] ↑ decided |
| • 6 [6] \rightarrow A2 applications made and 9 [8] \uparrow decided with 8 [10] \checkmark revoked |
| 72% [80%] ♥ of all decisions made on standard fee Part B applications decided within 4 months |
| 56% [38%] ↑ of all A2 new installation/substantial change decisions made within 6 months |
| |
| Notices |
| • 64 [78] \checkmark Part B enforcement and prohibition notices served |
| ■ 1,863 [1,259] ↑ variation notices served on Part B installations |
| • 5 [3] \bigstar successful prosecutions (total fines £130k [£19k] \bigstar) and 1 [3] \checkmark pending |
| 8 [5] A A2 enforcement and prohibition notices served |
| ■ 38 [59] ♦ A2 variation notices served |
| Inspections |
| ■ Average of 1.1 [1.4] ↓ inspections per Part B installation at application stage |
| Average of 2.2 [4.5]] ↓ inspections per A2 installation at application stage |
| • Average of 1.40 [1.34] 1 inspections per group I* permitted Part B installation |
| Average of 0.52 [0.59] ↓ inspections per group II + III* permitted Part B installation |
| Average of 2.4 [2.8] |
| Risk Assessment |
| |
| 2,987 [4,190] ↓ risk-assessed Part B installations in group I*: 3.7% [3.0%] ↑ high risk, 29.7% [24.2%] ↑ medium risk and 66.6% [72.8%] ↓ low risk |
| 13,594 [12,526] ↑ risk-assessed Part B installations in groups II + III*: 0.6% [1.0%] ↓ high risk, 6.4% [6.4%] → medium risk, and 93.0% [92.6%] ↓ low risk |
| 351 [351] → risk-assessed A2 installations: 11.1% [8.0%] ↑ high risk, 31.9% [36.5%] ↓ medium risk and 57.0% [55.6%] ↓ low risk |
| Risk Assessed Inspections |
| 9,499 [10,770] ↓ full Part B inspections, 1,208 [1,534] ↓ check, and 560 [635] ↓ extra |
| ■ 374 [418] ♥ full A2 inspections, 158 [163] ♥ check, and 293 [386] ♥ extra |
| 30% [34%] ↓ of authorities with group I Part B installations carried out fewer full inspections than expected on these installations. |
| ■ 25% [23%] ↑ of authorities with high or medium risk group II* Part B installations carried out |
| fewer full inspections than expected. |
| ■ 31% [38%] ♥ of local authorities with high or medium risk group III installations carried out |
| fewer full inspections than expected. |
| All but one authority report back to operators after inspections (88% both orally and in writing) |
| Risk Assessed Inspections and Monitoring |
| ■ 51% [36%] 1 of standard fee Part B installations provide authorities with monitoring data |
| • 83% [83%] \rightarrow of A2 installations provide authorities with monitoring data |
| |
| <i>Charging</i> Total income of £4.9m [£5.5m] ↓ from charges levied on Part B installations |
| |
| Total income of £683k [£546k] ↑ from charges levied on A2 installations 01% [01%] → of outbarities have cost accounts for Part B work. |
| • 91% [91%] \rightarrow of authorities have cost accounts for Part B work |
| There is no obvious correlation between local authorities' direct and indirect costs. |
| → no change/change <1% ↑ increase >5% ↑ increase $\leq 5\%$ ↓ decrease $\geq 5\%$ ↓ decrease $\leq 5\%$ |
| 'group I' = more complex Part B installations, 'group II' = less complex, 'group III' = least complex |
| Last year's figures in brackets; data on Part A2 permits in blue; data on Part B permits in black. |
| Note: During 2013 a large number of B installations were reclassified as reduced fee rather than standard fee which has had a significant impact on several of the reported percentages |

1 About the Local Pollution Control Statistical Survey

1.1 Background

Local authorities (i.e. councils, unitary authorities and port health authorities) across England & Wales are responsible for regulating a number of industrial processes whose emissions could have a detrimental effect upon the atmosphere.

The processes regulated by local authorities are partitioned into two types:

- Part A2 activities; and
- Part B activities.

A local authority's regulatory role encompasses:

- the initial authorisation or "permitting" of processes;
- inspecting operational installations;
- amending or revoking permits, where necessary; and
- prosecuting operators in those cases where processes fail to comply with regulations.

Defra's Local Pollution Control Statistical Survey (LPCSS) provides quantitative insight into each of these aspects of local authorities' regulatory roles.

Defra has commissioned its annual Local Pollution Control Statistical Survey (LPCSS) since 1991. The survey provides an annual snapshot of local authorities' regulation performance during the previous twelve months. The Department publishes the findings from the LPCSS in a form intended for several distinct groups:

- the general public;
- industry;
- policy groups within Defra; and
- the European Union.

This year's survey questionnaire consists of three distinct parts:

- a Part B sub-survey captures information about installations regulated under the Local Authority Pollution Prevention Control (LAPPC) regime;
- a Part A2 sub-survey captures information about installations regulated under the Local Authority Integrated Pollution Prevention and Control (LA-IPPC) regime; and
- a Common Questions sub-survey collects information that is common to, or independent of, the types of installation.

Three years ago, Defra adopted a new set of regions for analysing the returns from the LPCSS; it also made use of an updated set of indices of multiple deprivation (IMD) from the Department for Communities and Local Government (DCLG). As a result, readers are advised to take care when comparing the figures from recent years' survey, where broken down by region or deprivation quartile, with the corresponding figures from reports more than three years ago.

1.2 Changes to this year's survey

The bulk of this year's survey questionnaire is the same as that used last year. The main differences are as follows:

• Introduction of a new Section 18, collecting data relating to the operation of the Industrial Emission Directive (IED)

Reduced fee status was extended to new applications (in most cases) for 10 activities in October 2012 and set out in Parts 2 and 3 of the Schedule to the Part B Charging Scheme which now form subsets of sections 3.1, 3.5 and 3.6 of tables 5.3 and 5.5, and, 9 further activities in December 2013 and set out in Part 4 of the Schedule to the Part B Charging Scheme which now form subsets of sections 4.1, 6.3, 6.4 and 6.8.

1.3 Response rate (Table 24, Annex A)

Defra asked all three hundred and fifty seven (357) local authorities and port health authorities in England and Wales to take part in the survey. The Department received a completed questionnaire from all but five (5) authorities: Bristol City UA; Bristol PHA; Wolverhampton; Falmouth & Truro PHA; and Liverpool.

Bristol City UA, Bristol PHA and Liverpool had submitted a completed questionnaire in the previous year's survey. Wolverhampton and Falmouth and Truro PHA last submitted in 2009/10.

The response rate for the survey as a whole was 99%.

1.4 Format of returns (Tables 4a and 4b, Annex B)

All authorities that submitted a questionnaire completed the web-based version of the survey. As in previous years, Defra asked authorities to record the time that it took them to complete the survey questionnaire. It took the authorities an average of 6.6 hours, some 1.3 hours shorter than last year's average of 7.9 hours.

1.5 Inconsistencies and grossing

As in previous years, members of the Defra and Hartley McMaster project teams contacted authorities and resolved inconsistencies by e-mail or over the 'phone.

Given that Falmouth & Truro PHA, Kettering, Kingston upon Thames and Wolverhampton represented less than 2% of the total (B and A2) permits from the survey between them, there was no need to estimate the likely content of missing survey returns, i.e. there was no need for "grossing".¹

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Grossing is a technique for estimating the likely contents of an authority's survey form given (a) the contents of its submission from in previous years and (b) the changes in "*similar*" authorities' submissions over the same period.

2 Key findings from analysis of Part B installations

2.1 Applications and decisions (Tables 1 - 2 and 7 - 8, Annex A)

The numbers of applications received and decided for new Part B installations in 2013/2014 both increased this year, in contrast to the downward trend seen in recent years. The number of withdrawn applications decreased, again reversing the decline seen in recent years.

Authorities across England & Wales received 481 applications for new B installations in 2013/2014, a 13% increase from the 424 applications received during the previous year but still 16% less than the 573 received in 2011/2012. Authorities made decisions on 484 applications during 2013/2014, a 12% increase from last year's figure of 434 though still 17% lower than the corresponding 2011/2012 figure of 581 decisions.

The number of applications that authorities had on hand at the end of 31st March 2014 (viz. 119) was 11% below last year's figure of 133 and 6% lower than the 127 reported in 2011/2012.

The time taken to make a decision is defined as the time from an application being received to a permit being granted. During 2013/2014, authorities made 358 decisions for the categories of waste oil burners (<0.4MW), service stations, dry cleaners and vehicle refinishing: 72% of these applications were decided in under two months, 21% were decided in two to four months, while the remaining 7% took over four months to decide.

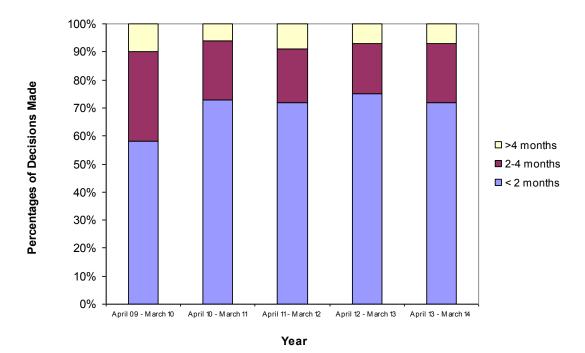


Figure 2.1: Percentages of decisions made within specified times on applications for reduced fee Part B installations, by year. (457 decisions in 2009/10, 420 in 2010/11, 359 decisions in 2011/12,263 decisions in 2012/2013 and 358 decisions in 2013/14)

Between them, the remaining (standard) categories of installation accounted for 126 applications: of these, 69% took less than four months for a decision, 16% took between four and six months, while the remaining 15% of these applications took more than six months for a decision.

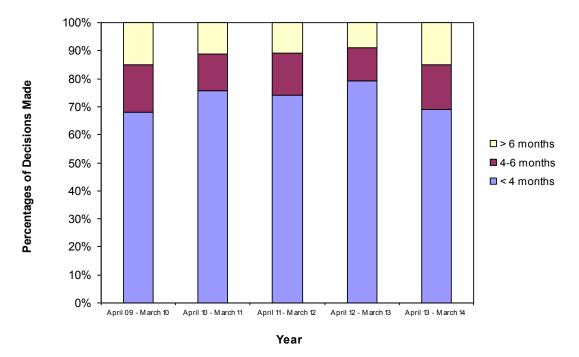


Figure 2.2: Percentages of decisions made within specified times on applications for standard (full) fee Part B installations, by year. (265 decisions in 2009/10, 228 in 2010/11, 222 in 2011/12, 171 decisions in 2012/13and 126 decisions in 2013/2014).

2.2 Permitted installations (Tables 3 – 6, Annex A)

There were 17,787 permitted Part B installations throughout England and Wales in 2013/2014. This figure represents a small (2.5%) decrease from the corresponding figure (17,930) in last year's survey and a 3.4% drop from the level (18,236) recorded in 2011/2012.

2.3 Notices (Table 11, Annex A)

Authorities across England & Wales served 1,927 notices (excluding revocations) on Part B installations in 2013/2014, an increase of 44% from the corresponding figure of 1,337 in 2012/2013. Amongst the 1,927 notices served this year, 1,838 were variation notices; the latter figure has increased by 50% from 1,222 in 2012/2013. The number of enforcement and prohibition notices served decreased by 18% during the same period (from 78 in 2012/2013 to 64 in 2013/2014).

2.4 Enforcement policies (Table 13, Annex A)

98.3% of authorities reported that their LAPPC enforcement complies with the Regulators Compliance Code. This represents a 1.4% increase relative to last year's figure of 96.9%. Three (3) of the six (6) non-compliant authorities had between 21 and 50 installations; five (5) belonged to the English shire districts local authority group. All of the non-compliant authorities fell into the East Anglia, South East or South West regions.

One of the authorities that reported compliance with the regulators Compliance Code last year reported non-compliance this year – Basildon.

2.5 Inspections (Tables 15 - 16, Annex A)

Inspections – General Data

Before the 2010/2011 survey, the LPCSS asked authorities to account separately for

- the numbers of applications that they had received for new installations and
- the number of inspections carried out in support of these applications.

At the same time, authorities were asked to distinguish between

- applications for new installations under Part B and
- applications for substantial changes to existing installations under Part B.

The pre-2010/2011 surveys then reported on the ratio of total (i.e. both new and substantial change) inspections to total applications. Since the 2010/2011 survey, Defra has continued to collect data separately for the number of inspections carried out in support of both types of application; however, the Department no longer asks authorities to specify the number of applications received for substantial changes to existing installations. With only the numbers of applications for new installations available, reports since 2010/2011 have quoted the ratio of:

- the number of inspections carried out in support of applications for new installations to
- the number of applications for new installations.

Given this difference in definition of the inspection rate, the reader is discouraged from comparing the 2010/2011 or subsequent years' ratios with those from previous years.

In 2013/2014, authorities carried out an average of 1.07 inspections on a new installation prior to a decision being made.

The average number of inspections per permitted, full fee installation (excluding such processes as waste oil burners (<0.4MW), service stations, dry cleaning and vehicle refinishing) increased again this year to 1.32; it was 1.22 last year and 1.31 in 2011/2012. This inspection rate had previously fallen steadily since the introduction of risk-based assessments for Part B installations in 2003. The average number of inspections for reduced fee activities (i.e. waste oil burners (<0.4MW), service stations, dry cleaning and vehicle refinishing) was 0.50; this rate is lower that both last year's figure of 0.54 and the corresponding figure of 0.58 in 2011/2012.

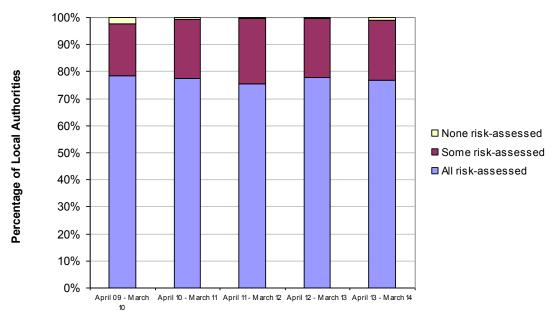
For inspections not in connection with applications, the majority (72%) of inspections last between half an hour and two hours. There was at least one installation requiring inspections over two hours for all process types except Gasification, Bulk Chemicals, and Reduced fee using PG6/12 or PG6/36 only. Two process types incurred inspections lasting longer than two hours for all inspections: Asbestos and Reduced fee using PG6/19 only.

Risk Assessment

Installations are classified into three groups:

- Group I Standard installations
- Group II Vehicle refinishing (PG6/34b only) and mobile plant
- Group III Other reduced fee activities (small waste oil burners, dry cleaners, petrol stations (PVRI and II))

269 authorities reported that they had risk assessed all of their installations during 2013/2014. In 2012/2013, the corresponding figure was 273 authorities. Three (3) authorities reported having risk assessed none of their installations; last year, only one authority had risk assessed none of their installations.



Year

Figure 2.3: Percentage of local authorities, by year, that have risk-assessed all, some or none of their Part B installations. (346 local authorities in 2009/10, 354 in 2010/11, 353 in 2011/12, 351 in 2012/2013 and 350 local authorities in 2013/2014)

16,581 installations had been risk assessed by the end of 2013/2014; this represents 93.2% of all permitted Part B installations, the same fraction as seen in 2012/2013.

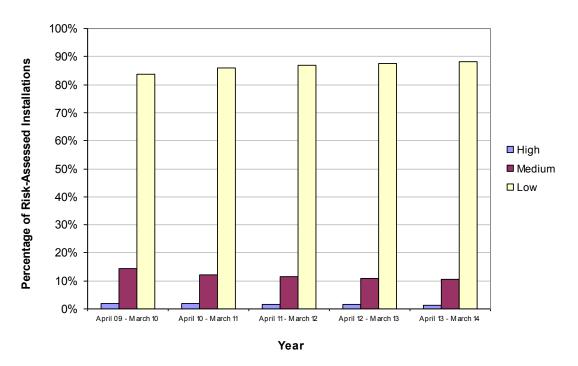


Figure 2.4: Percentages of risk-assessed Part B installations classified as high, medium or low risk, by year. (17,741 risk-assessed installations in 2009/10; 17,166 in 2010/11; 17,190 in 2011/2012; 16,716 in 2012/13; and 16,581 in 2013/2014)

Amongst risk-assessed installations in 2013/2014, 18% (2,987) were standard installations (Group I), 20% (3,244) were vehicle refinishers or mobile plant (Group II), while the remaining 62% (10,350) were other reduced fee activities (Group III). The breakdown of risk-assessed installations by category of risk is shown in the following table:

| | Group I (previous years in brackets) | Group II | Group III |
|--------|---|--|--|
| High | 3.7% (3.0% in 2012/2013, 3.3% in 2011/12, 3.5% in 2010/2011, 3.4% in 2009/2010, 3.3% in 2008/2009, 3.0% in 2007/2008 and 4.0% in 2006/2007) | 0.8% (1.1% in 2012/2013, 0.7% in 2011/2012, 0.9% in 2010/2011, 1.2% in 2009/2010) | 0.6% (1.0% in 2012/2013, 1.1% in 2011/2012, 1.2% in 2010/2011, 1.4% in 2009/2010) |
| Medium | 29.7% (24.2% in 2012/2013, 24.5% in 2011/2012, 25.7% in 2010/2011, 28.6% in 2009/2010, 29.2% in 2008/2009, 32.8% in 2007/2008 and 36.3% in 2006/2007) | 8.2% (7.4% in 2012/2013, 7.7% in 2011/2012, 9.2% in 2010/2011, 11.1% in 2009/2010) | 5.8% (6.2% in 2012/2013, 6.7% in 2011/2012, 6.7% in 2010/2011, 8.7% in 2009/2010) |
| Low | 66.9% (72. 8% in 2012/2013, 72.2% in 2011/2012, 70.8% in 2010/2011, 68.0% in 2009/2010, 67.5% in 2008/2009, 63.2% in 2007/2008 and 59.3% in 2006/2007) | 91.0% (91.5% in 2012/2013, 91.6% in 2011/2012, 89.9% in 2010/2011, 87.6% in 2009/2010) | 93.6% (92.8% in 2012/2013, 92.2% in 2011/2012, 92.1% in 2010/2011, 89.9% in 2009/2010) |

For standard (Group I) installations, this year's figures reverse the previous years' trend towards a lower fraction of medium risk assessments.

Inspections – Risk-based Data

Authorities carried out a total of 11,267 inspections on risk-assessed installations this year. Of these 9,499 were full inspections, 1,208 were check inspections and the remaining 560 were extra inspections.

Defra and WAG's guidance stipulates that a high-risk, standard (i.e. Group I) installation should receive two full inspections and one check inspection per year, while all other groups (i.e. Groups II and III) of high risk installation should receive one full inspection and one check inspection per year. A medium risk group I installation should receive one full and one check inspection per year; all other medium risk installation should receive one full inspection per year. The inspection frequency for a low-risk installation also depends on the group, with standard (Group I) installations requiring one full inspection every two years and Group III installations requiring one full inspection every two years and Group III installations requiring one full inspection performance cannot be assessed for low-risk installations in Groups II and III as there is no fixed number of inspections required in any specific year.

For standard (Group I) installations of all risk categories, 18% of authorities carried out more full inspections than were required – a decrease from last year when the corresponding figure was 19%.

97 authorities carried out fewer full inspections on Group I installations than required, compared to 112 last year. The proportion of authorities that carried out more check inspections than required on Group I installations in 2012/2013 is 13%, less than the corresponding fraction (20%) last year, while the proportion of authorities carrying out fewer check inspections than required has risen to 35% this year, from 33% in 2012/2013. The breakdown of inspection performance for Group I installations, by category of risk, is shown in the following table:

| | More inspections than required | As many inspections as required | Fewer inspections than required |
|-------------|--------------------------------|------------------------------------|---------------------------------|
| High Risk | | | |
| Full | 14% | 52% | 34% |
| Check | 14% | 40% | 47% |
| Medium Risk | | | |
| Full | 19% | 68% | 13% |
| Check | 3% | 49% | 48% |
| Low Risk | | | |
| Full | 9% | 62% | 29% |
| Check | 13% | 87% | 0% |

For group II installations assessed as high or medium risk, 15% of authorities carried out more full inspections than required, 31% conducted more check inspections than required, while 25% conducted fewer full inspections than required and 6% conducted fewer check inspections than required.

For group III installations assessed as high or medium risk, 4% of authorities carried out more full inspections than required, 15% conducted more check inspections than required, while 31% completed fewer full inspections than required and 9% conducted fewer check inspections than required.

Overall, 35% of authorities carried out fewer full inspections than required. Of these 116 authorities, 53% provided a reason for the shortfall. Amongst those authorities that completed less than 80% of their expected full inspections, the most frequent explanations involved:

- Organisational issues, such as lack of staff, staff on maternity leave or off sick, departmental restructuring;
- Problems with operators, e.g. companies going out of business, in receivership or general communications problems;
- Installations closing or being downgraded during the reporting period for which the permit information had not been updated;
- Processes mothballed or not operating for other reasons;
- Mobile equipment being out of area

Three authorities reported having risk-assessed no installations.

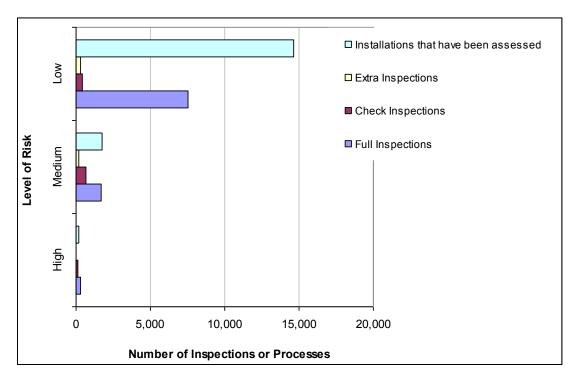


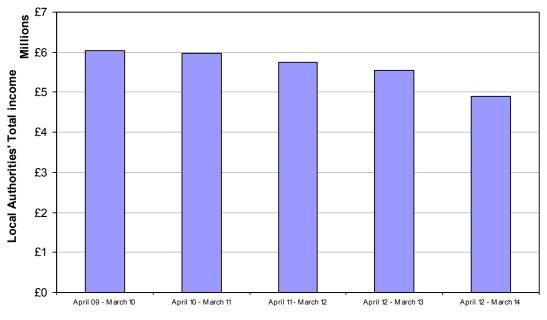
Figure 2.5: Inspections performed on risk-assessed Part B installations, broken down by level of risk. (11,267 inspections; 16,581 risk-assessed Part B installations)

2.6 Monitoring (Table 17, Annex A)

Data is reported in only two groupings: standard installations, and reduced fee activities. 51% of the 3,375 standard installations provided monitoring information, with the data from 18.6% of these requiring more than two hours to examine. Among the remaining 14,412 reduced fee activities, 20% provided monitoring information, with authorities having to spend more than two hours examining the monitoring data from just 7.1% of them.

2.7 Fees and charges (Tables 19 – 20, Annex A)

Authorities reported their total income received in 2013/2014 as $\pounds 4.9m$. The corresponding figures in 2012/2013 and 2011/2012 were $\pounds 5.5m$ and $\pounds 5.7m$ respectively. The 2013/2014 figure represents an average of $\pounds 13,883$ for each of the 352 authorities that reported their income.



Year

Figure 2.6: Total income from application fees and annual charges for Part B installations for local authorities across England & Wales, by year (2009-2014)

2.8 Cost accounting (Table 22, Annex A)

322 (91%) authorities accounted separately for costs and income associated with LAPPC by 31st March 2014. The corresponding figures in previous years were as follows: 91% of authorities in 2012/2013, 92% of authorities in 2011/2012, 90% in 2010/2011, 90% in 2009/2010, 91% in 2008/2009, 86% in 2007/2008, 82% in 2006/2007 and 83% in 2005/2006.

3 Key findings from analysis of the Common Questions

3.1 Prosecutions and cautions (Tables 1a and 1b, Annex B)

During 2012/2013, six (6) prosecutions were reported and four (4) formal cautions were issued. As of 31st March 2014, there was just one (1) prosecution pending, while the other five (5) prosecutions had all been successful. The successful prosecutions had fines totalling £130,000; the largest being for £120,000. This is an increase from last year's figure of £18,948 for total fines; in 2011/2012 the corresponding total fines figure was £66,276.

3.2 EULegislation Data (Tables 2a-2e, Annex B)

Almost all (99%) authorities think that their installations comply completely or substantially with the legislation on Minimum Inspection Criteria. 159 (45%) authorities carried out more inspections during 2013/2014 than they had planned, whereas 91 (26%) carried out fewer than planned.

As in recent years' surveys, over nine tenths (95%) of authorities reported that they draw up an inspection plan at the beginning of the reporting year. However, just 16% of authorities carry out visits that are co-ordinated with other agencies.

The majority (88%) of authorities communicate their inspection reports to the site operators both orally and in writing. A further 8% of authorities communicate their inspection reports just in writing. 88% of authorities now make their inspection reports available to the public.

3.3 Solvents Emissions Directive (Table 3a, Annex B)

There were 2,495 Solvent Emissions Directive (SED) installations holding permits, with a further eight (8) having been withdrawn. 26.6% of SED installations holding a permit use the reduction scheme, 7% did not submit a solvent management plan and 6% of operators are breaching SED requirements.

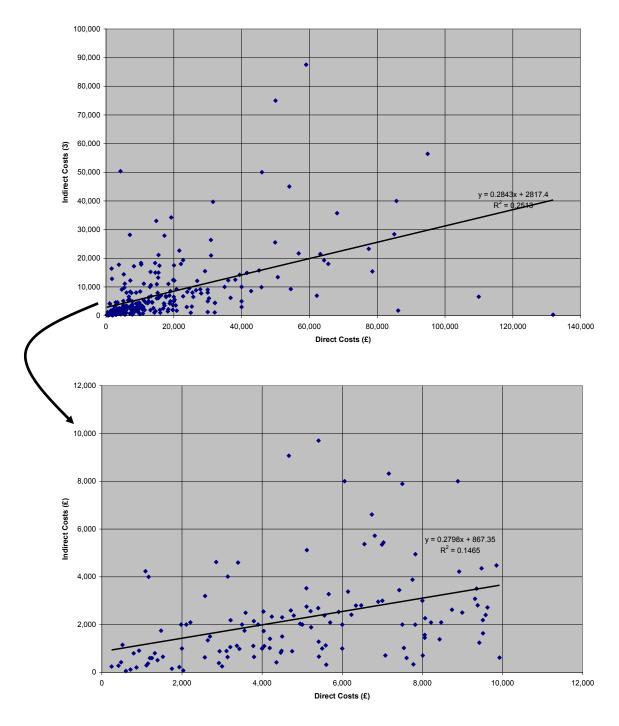
3.4 Paints Directive (Table 3b, Annex B)

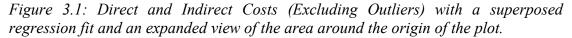
There were five (5) instances of non-compliance with the Paints Directive during 2013/2014. All of these were due to mislabelling. In total, there were forty-one (41) litres of non-compliant paint.

3.5 Costs of running the service

This question investigated whether there was any relationship between direct and indirect costs; it was suspected that indirect costs in particular may not be recorded correctly. Figure 3.1 shows (non-zero) direct costs plotted against (non-zero) indirect costs, excluding a single outlier with very large costs. If a correlation exists, the data would lie roughly on a straight line. Given how scattered the points on the chart are, it can clearly be seen that there is no obvious correlation between direct and indirect costs. This informal conclusion is reinforced by the regression line shown superposed on the data points; the relatively low value of the accompanying R^2 indicates that the straight-line relationship is a poor fit to the data. [R^2 values close to one indicate a good fit; values closer to zero indicate a poor fit.]

A second graph provides and expanded view of the region closest to the origin of the graph. Again, there appears to be little evidence for a linear relationship between direct and indirect costs.



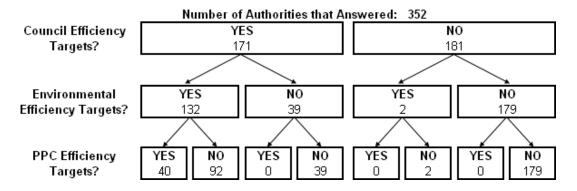


Thirty-three (33) of the authorities that provided a value (greater than zero) for their direct costs stated that their indirect costs were zero.

3.6 *Efficiency Savings (Tables 5a-5d, Annex B)*

The diagram below shows the number of authorities with efficiency savings targets for 2013/2014 at council, environmental services and PPC function levels.

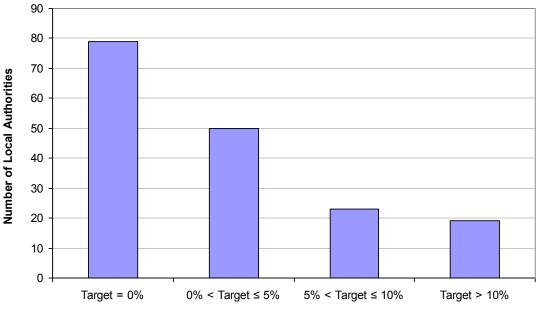
Number of Authorities with Efficiency Targets (Annex B)



40 authorities (11%) reported having efficiency savings at all three levels. 92 (26%) authorities had targets for council and environmental services but not for the PPC function. 39 (11%) authorities had efficiency savings only at the level of all council services.

79 authorities reported a 0% target at the council level. 106 authorities reported no efficiency target (as opposed to a 0% efficiency target) at the council level.

Amongst the 92 authorities reporting an efficiency target greater than 0% at the council level, the most frequently reported figure (i.e. the mode) for all council service targets was 10%, the same as last year.



Percentage Target

Figure 3.2: Numbers of local authorities with percentage targets for efficiency savings, at the level of all council services for 2014/2015, within specified intervals (171 local authorities with council-level targets)

Most (75%) of the 40 authorities that gave a percentage target for each level specified the same figure in all three cases. Of the 92 authorities that gave a percentage target just for the council and environmental services levels, 75 (82%) gave the same percentage target figure.

The survey asks authorities what percentage of their efficiency savings is cashable as opposed to noncashable. Cashable efficiency savings mean increasing the production or maintaining current production with reduced resource inputs. This represents a direct financial saving which can be

recycled into the service or put elsewhere in the local authority. Non-cashable efficiency savings mean increasing production or improving the quality of the service with the same resource inputs. There is no direct financial saving even though it is still an efficiency saving.

At the level of the Council as a whole, 62% of authorities did not know the cashable percentage, 19% had <25% cashable, 16% had >75% cashable, 2% had 25-50% and the remaining 1% fell into the 50-75\% cashable bracket. The splits for environmental services were similar (61%, 20%, 16%, 2% and 1%).

For the PPC function, 60% did not know the cashable percentage, 20% had <25% cashable and 17.5% had >75% cashable. 2.5% were in the 25-50% bracket while no authorities reported a split of between 50% and 75% cashable savings.

The continuing high percentage of "not known" suggests that the concepts of cashable and non-cashable efficiency savings have yet to filter down to frontline officers.

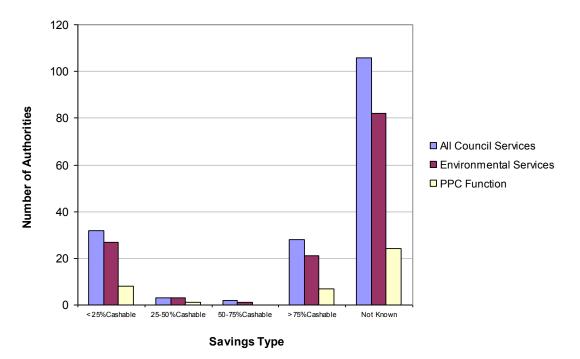


Figure 3.3: Numbers of local authorities with specified levels of cashable savings targets at the levels of council, environmental services and the PPC function (171 LAs with targets for all council services; 134 LAs with targets for environmental services; 40 LAs with targets for the PPC function).

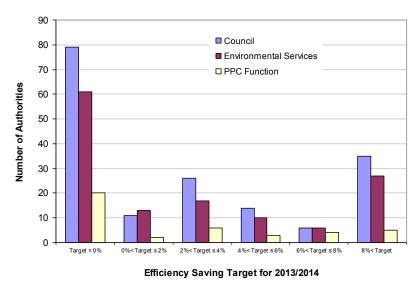


Figure 3.4: Numbers of authorities with specified levels of efficiency savings targets at the levels of council, environmental services and PPC function.

3.5 Cremations in Regulated Crematoria (Table 6, Annex B)

Across England & Wales, 190 authorities regulate 227 crematoria. Between them, these regulated cremators performed 331,516 cremations. 97,504 (29%) of these cremations took place in cremators fitted with mercury abatement; the remaining 234,012 (71%) took place in cremators that were not fitted with mercury abatement.

4 Key findings from analysis of Part A2 installations²

4.1 Applications and decisions (Tables 1-3 and 7-8, Annex C)

In 2013/2014, authorities across England & Wales received six (6) applications for A2 permits; this is the same number as in 2012/2013. In 2011/2012, authorities received nine (9) applications. In addition to these new applications, authorities had seven (7) applications on hand at the beginning of 2013/2014. No applications were withdrawn but nine (9) decisions were made on applications during 2013/2014. The number of decisions (9) this year is one more than last year and the year before that. Five (5) of this year's decisions were made in less than six months; one took between six and nine months; the remaining three (3) took over nine months. Four (4) applications were still on hand at 31st March 2014.

| Year | Number of Decisions | < 6 months | 6-9 months | > 9 months |
|---------------------|---------------------|------------|------------|------------|
| April 09 - March 10 | 12 | 7 | 2 | 3 |
| April 10 - March 11 | 9 | 3 | 3 | 3 |
| April 11 - March 12 | 8 | 2 | 3 | 3 |
| April 12 - March 13 | 8 | 3 | 0 | 5 |
| April 13 - March 14 | 9 | 5 | 1 | 3 |
| Total | 46 | 20 | 9 | 17 |

Table 4.1: Number of decisions made within specified times on applications for Part A2 installations, by year.

Since 2009/2010 there have been 43 applications for new installations, 7 applications have been withdrawn and 46 decisions have been made. Therefore, over the last five years, authorities have made roughly the same number of decisions as applications received.

4.2 Permitted and revoked installations (Tables 4, 5, 6 and 8, Annex C)

There were 355 permitted A2 installations in England and Wales at the end of 2013/2014, five (5) fewer than at the end of 2012/2013. The West Midlands region reported having the most authorised A2 installations (72), with North Wales reporting the least (10).

8 A2 permits were revoked or surrendered during 2012/2013; a further installation was partially surrendered or revoked.

4.3 Notices, prosecutions and cautions (Table 10, Annex C)

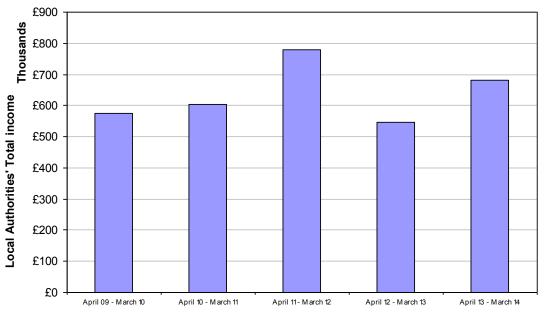
There were 46 notices (excluding revocations) issued to A2 installations during 2013/2014, compared to 57 last year and 52 in 2011/2012. There was an increase in the number of variations, from 52 in 2012/2013 to 38 in 2013/2014. There were 8 enforcement notices issued in 2013/2014, compared to 5 the previous year.

Prosecutions and cautions are dealt with in the common questions part of the survey form.

4.4 Fees and charges (Tables 12 and 13, Annex C)

The total income received in 2012/2013 relating to A2 installations was £682,860, i.e. an average of around £4,200 for each of the authorities reporting on fees and charges for Part A2 permits. This represents a reduction of 17% relative to the corresponding average of £3,500 in 2012/2013.

² The reader is reminded that the figures reported here exclude Bristol City UA, Wolverhampton and Liverpool, which failed to submit a survey return this year. Bristol City UA had 1 A2 permit at last submission, Wolverhampton had 3 and Liverpool had 2.



Year

Figure 4.2: Total income from application fees & annual charges for Part A2 installations across England & Wales, by year (2009-2014)

The Metropolitan districts continue to have the highest average income at £9,533, an increase of 81% from £5,253 in 2012/2013. The Port Health Authorities have the lowest average income of £1,384 in 2013/2014.

In 2012/20013, the Yorkshire and Humberside region received the biggest income with 31% of the total; at the opposite extreme, the North Wales region received just over 2% of the total income.

4.5 Inspections (Tables 16 and 18, Annex C)

There were 20 inspections carried out in respect of applications for A2 permits, equating to 2.2 inspections per application decided upon.

For those categories of process in which at least one decision was made: Schedule 13A Small waste incineration plant installations received the most inspections per decision (3); Non-ferrous metals and Galvanising installations received the fewest inspections per decision (1) during 2013/2014. A total of 868 inspections were carried out after a permit had been granted: 542 (62%) of these were for routine or programmed inspections; 282 (33%) were in response to complaints and 44 (5%) were for other reasons.

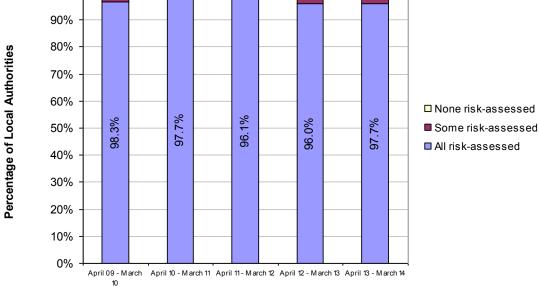
65% of inspections at A2 installations conducted in respect of applications took longer than two hours; 30 % took between half an hour and two hours, with the remaining 5% taking less than half an hour. For inspections not in respect of applications, 43% took more than two hours, 45% took between half an hour and two hours, while 12% took less than half an hour.

The 868 inspections (not in connection with applications) conducted at the 355 permitted installations gives an average of 2.5 inspections per installation, a lower rate than that reported in last year's survey, viz. 2.8 inspections per installation.

Inspections – Risk-based Data

Amongst the 171 authorities that completed the relevant section of the A2 questionnaire, 167 reported having risk-assessed all of their installations, with a further three reporting that they had risk-assessed

at least some of their installations. Only one authority reported having risk-assessed none of their installations.



Year

Figure 4.3: Percentages of local authorities that have risk-assessed all, some or none of their Part A2 installations, by year. (175 in 2009/10, 177 in 2010/11, 179 in 2011/12, 175 in 2012/13 and 171 in 2013/2014).

170 authorities had at least one permitted installation at the end of 2013/2014. Of these, only 1 (Derbyshire Dales) had not risk assessed any of their installations.

In total, 351 installations had been risk assessed and 11% of these were assessed as high risk, 32% were medium risk and the remainder (57%) were low risk. The corresponding figures last year were 8% (high), 37% (medium) and 56% (low)

A total of 374 full inspections were carried out during 2013/2014, along with 158 check inspections and 293 extra inspections. Overall, for A2 installations of all risk categories, 9% of authorities carried out more full inspections than were required, with 17% carrying out fewer full inspections than expected. For check inspections, 14% carried out more than expected, while 18% carried out fewer than expected.

Of the 29 authorities carrying out fewer full inspections than expected, 19 provided reasons for the shortfall in inspections.

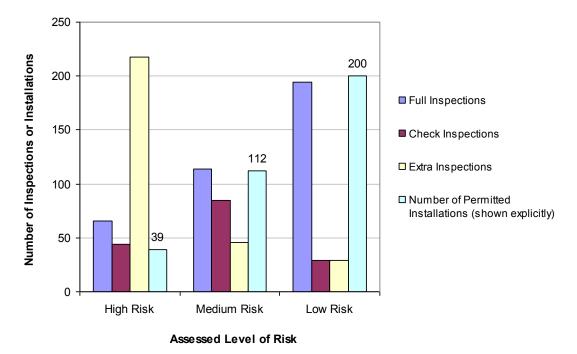


Figure 4.4: Number of inspections of risk-assessed Part A2 installations, broken down by type (i.e. full, inspection or extra inspections), with numbers of risk-assessed installations shown explicitly above final columns.

At a more detailed level, amongst the 26 authorities with high risk A2 installations, 12% conducted more full inspections than required while 23% conducted fewer full inspections than expected. When it came to check inspections, 27 conducted more than were required, with 42% conducting fewer check inspections than required.

Amongst the 70 authorities regulating medium-risk A2 installations, 10% of authorities conducted more full inspections than required, with 13% conducting fewer than required (compared to 5% in 2012/2013). For check inspections on medium-risk installations, 6% conducted more than the required number, with 33% conducting fewer than required.

Amongst the 125 authorities regulating low-risk A2 installations, 9% conducted more full inspections than required, with 13% conducting fewer than required (check inspections are not required for low risk installations). For check inspections on low-risk installations, 14% conducted more than the required number, with no authority conducting fewer than required.

The table in Annex E details the full and check inspection rates, in terms of risk, achieved by each individual authority.

4.6 Monitoring (Table 17, Annex C)

83% of installations provided monitoring data in 2013/2014. Of these, 7% produced data that was examined for less than half an hour over the year, 47% was examined for half an hour to two hours over the year, while the remaining 46% was examined for more than two hours.