

Environmental Health *Scotland*

The Journal of the Royal Environmental Health Institute of Scotland



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THE CHIEF EXECUTIVE'S VIEW



Jackie McCabe.

Welcome to the summer edition of *Environmental Health Scotland*.

Over a year on, and we are still living and working with COVID-19 restrictions. The work of the Institute continues with Council and Committee meetings still being held remotely in the evenings and weekends. Sadly, the Institute's Annual Forum, which is normally held in April, did not take place for a second year. It is hoped, restrictions permitting, that we can hold a 'hybrid' event prior to this year's Annual General Meeting on Friday 19 November. I would encourage all members to attend this meeting, and to consider contributing to the work of the Institute by standing for election to the Council.

The Institute is incorporated by Royal Charter, is a registered Scottish charity, is a member-based society, is the organisation that governs the Environmental Health Profession in Scotland, is a UK Competent Authority for the Environmental Health Profession in terms of UK legislation, is a national awarding body for a wide range of qualifications in environmental health and through our community training is a national training organisation with approved training centres across Scotland.

All REHIS Council and Committee members give their own time to the work of the Institute and contribute to the maintenance of high standards in development and

delivery of community training and in examinations for Environmental Health Officers and Food Safety Officers. I would be happy to give more information to any member who may be considering standing for election.

The Institute has two centres for members: the Southern and Northern who organise and host member events throughout the year. The Institute also has three Working Groups: Public Health and Housing (PHHWG), Health and Safety (HASCOG) and Pollution Control (SPCCC) which are chaired by REHIS members and meet regularly (on Teams) to communicate and share practice with representatives working in the relevant field.

In the Winter/Autumn edition of *Environmental Health Scotland*, the Institute launched its Manifesto detailing the challenges identified to protect and improve Scotland's environmental health and to support our communities through, and beyond, the Coronavirus pandemic. Now that the Scottish elections have taken place, a copy of the Manifesto has been communicated to all of the Members of the Scottish Parliament inviting them to work with the Institute on these challenges.

Finally, I would like to thank all individuals and organisations who have contributed to this edition of *Environmental Health Scotland* and to wish readers and contributors an enjoyable, safe Summer.

SCOTTISH GOVERNMENT, COVID READY SOCIETY

by Catherine McKenna, Team Leader for Covid Ready Society, Directorate for Covid Public Health, Scottish Government

COVID-19 has very much changed the way we work as a government. Our priority has always been preserving the health of our nation, and this has become a significant challenge in recent months. As we progress through the pandemic, more information and evidence has become available, supporting myself and others to develop policy propositions that ensure people have the advice, guidance and assistance they need during these unprecedented times.

The public health community are central to our response to COVID-19. We work daily with leading clinicians, Public Health Scotland and a range of others to ensure the guidance we have in place meets our aim of protecting public health, but also supporting our welfare, economy and in recent months our young people to engage in learning. All of which we recognise as critically important development. The Scottish Government welcome the contribution of health officials and representatives and embrace that we ourselves are learning more about the virus each day and the risks it poses to our way of living.

Environmental Health is critically important to how we respond to the challenges of COVID-19. Our aim since the outset of the pandemic has been to be transparent and share what information and evidence we have regarding the virus and its impact on society. This knowledge dissemination will continue to be a vital part of how we respond in the coming weeks and months, supporting everyone to understand the risks associated with the virus, the challenges it presents and how we may overcome these to keep safe in society and maintain some degree of normality, albeit in a different way from before, such as using face coverings and physical distancing. Your officers will support how we safely restart a variety of sectors, and therefore through inspection, advice and guidance you will be integral to supporting our businesses, and others, to reduce the transmission of the virus in various contexts.

Ministers are hopeful public understanding of disease control and prevention is enhanced by the pandemic.

We are all learning as a nation and have established a range of practices that are geared towards reducing the spread of the virus. These may well be appropriate and applicable to possible future pandemics and other viruses. We have developed our understanding of hygiene and transmission through contact, surfaces and through aerosols. We will harness this knowledge and consider our approach to future public health initiatives.

COVID-19 has changed the way we work as a nation. Every day we hear about sectors, businesses and individuals embracing technology to continue to deliver critical and other services and we are delighted to see such change being embraced by our nation. Schools, colleges and universities are embracing online learning and have provided unique insight into different ways of working. Digital delivery has allowed us to engage with a greater and more diverse range of stakeholders and individuals, supporting our consultation on policies critical to our COVID-19 response and affording us the ability to capture feedback instantaneously and make any necessary adjustments or amendments. However, we are equally mindful of the importance of ensuring that we provide an infrastructure for such considerations, ensuring all of society can participate in such modes of learning and working.

Please be assured that the health, wellbeing, and safety of people is our priority. In developing policy, Ministers have sought to balance the twin aims of reducing the transmission of COVID-19 with wider health and social considerations to best protect you and those around you.

Editor's Note

The above letter is in response to correspondence sent to senior Scottish politicians, in which the Institute set out the important role of the Environmental Health profession during, and after, COVID-19. We welcome the recognition of the work of the profession and its contribution to public health.

FOOD STANDARDS SCOTLAND

by Food Standards Scotland



Tackling the Scottish diet is at the heart of Food Standards Scotland's new five-year strategy

Food Standards Scotland has published its strategic ambitions for the next five years. It will focus on the issues that matter most to people in Scotland, including renewed emphasis on improving the Scottish diet and associated negative health consequences.

'Healthy, Safe, Sustainable: Driving Scotland's Food Future' for 2021-2026 is FSS's second Strategy, and realigns the organisation's efforts recognising the significant societal, political and environmental changes that have occurred since it was established in 2015.

It sets out how the independent public sector food body will help to protect the diverse interests of people in Scotland. The organisation plans to continue to take a robust evidence-based approach in its activities as the trusted and influential source on food information and advice.

FSS will continue to work with others such as the food and drink and hospitality sectors, government and other key partners in order to deliver on its commitments.

Food Standards Scotland's Chair, Ross Finnie, said:

"Food Standards Scotland's new Strategy builds on progress from our first five years.

"The COVID-19 pandemic has brought the need to improve Scotland's diet into sharp focus, highlighting the need for urgent action. Over-weight and obesity lead to poor health which increases the risks from COVID-19. There has been no real improvement in the

last 20 years and the pandemic is a very stark warning that further policy action is needed to tackle Scotland's poor diet. FSS will play its part by redoubling our effort on diet and health.

"The question for all of us when it comes to diet is 'If we don't tackle it now, then when?'

"Everyone, including FSS, government, the food and drink and hospitality sectors as well as consumers have a role to play in turning around poor health outcomes from overweight and obesity with a clear focus on preventative measures. We cannot do it alone. We will work with those who share our interests to reduce the burden of diet-related disease that inhibits the nation's wellbeing and prosperity."

Food Standards Scotland's Chief Executive, Geoff Ogle, said:

"Significant issues and societal changes such as the EU Exit and COVID-19 have dramatically changed our way of life and will have an impact for years to come, while climate change presents future challenges with respect to security, nutritional quality and the safety of our food chain.

"We will continue to put consumer interests and public health protection at the heart of our work. As well as continuing to ensure the food we eat is safe and authentic, we want to empower healthier food choices including in the out-of-home food environment such as food on the go, cafes, restaurants and take-aways."

Scottish Dietary Goals

- In Scotland, Dietary Goals are used to benchmark the national diet and where we need to be. Food Standards Scotland monitors progress towards achieving the Scottish Dietary Goals.
- The Scottish diet is too high in calories, fats, sugar and salt, and too low in fibre, fruit and vegetables, and other healthy foods like oil-rich fish.
- Two out of three people in Scotland are overweight or obese, and there is a higher proportion of people living with obesity in the most deprived areas compared to the least deprived areas.
- A high proportion of our calories, fat and sugars comes from discretionary foods. These are foods that we don't really need for a healthy diet, including confectionery, cakes, biscuits, pastries, savoury snacks and sugary drinks.

- The food environment needs to change to make it easier for consumers to choose a healthier diet, with fewer discretionary foods and more fruit, vegetables and fibre. Everyone, including the food and drink industry, media and government needs to play their part.

About Food Standards Scotland

Food Standards Scotland (FSS) was established on 1 April 2015 by the Food (Scotland) Act 2015 as a non-ministerial office, part of the Scottish Administration, alongside, but separate from, the Scottish Government.

FSS's vision is for "A safe, healthy and sustainable food environment that benefits and protects the health and well-being of everyone in Scotland".

This is with the aim of the following five outcomes:

- Food is Safe and Authentic
- Consumers Have Healthier Diets
- Responsible Food Businesses are enabled to thrive
- Consumers are empowered to make positive choices about food
- FSS is trusted and influential

Watch Food Standards Scotland's new 'About Us' video animation: <https://youtu.be/M3Cm5hCvJA4>.

* * *

HEALTH AND SAFETY EXECUTIVE

by Tara Burgess, Local Authority Unit, Health and Safety Executive

Coronavirus (COVID-19) advice and guidance

As COVID-19 restrictions begin to ease in Scotland and the vaccine rollout continues, it is important to remember that the virus has not gone away: we all need to play our part in order to stay safe and not become complacent in our workplace environments. From 17 May, much of the leisure and entertainment industry re-opened in Scotland (COVID-19 restriction levels can be found on the government website: www.gov.scot). HSE will continue to revisit and update COVID-19 guidance to reflect any changes to ensure good practices and standards are still maintained throughout this time in all our workplaces.

The following page provides the latest information and updates related to workplace safety, and includes useful links to guidance from other public health bodies and government departments: <https://www.hse.gov.uk/coronavirus/roadmap-further-guidance.htm>.

By law, businesses are required to reduce the risk of COVID-19. Part of this includes talking to employees, explaining what changes there will be and trying to alleviate concerns they may have. HSE has developed information for businesses to assist in talking to workers about reducing risks from COVID-19 which can be found on the following page: <https://www.hse.gov.uk/coronavirus/working-safely/talking-to-your-workers/index.htm>.

Many of the businesses who have recently re-opened include indoor cafés, pubs, restaurants and visitor attractions. Ventilation is key to reducing COVID-19 risks as adequate ventilation reduces how much virus is in the air. Effective ventilation can be achieved using natural ventilation (which relies on passive air flow through windows, doors and air vents that can be fully or partially opened) or mechanical ventilation (using fans and ducts to bring in fresh air from outside), or a combination of natural and mechanical ventilation.

HSE has revised the current ventilation guidance to help businesses identify and take action in poorly ventilated areas to help protect workers and members of the public from transmission of the virus. More information can be found here: <https://www.hse.gov.uk/coronavirus/equipment-and-machinery/air-conditioning-and-ventilation>.

Mental Health Awareness

Mental Awareness Week was 10 to 16 May 2021. Work related stress and mental health remains a challenging issue and many factors that exacerbate stress have been amplified by the pandemic. HSE recognises this and has developed a 'Health Talking Toolkit' for use in the NHS and Social Care sectors in Scotland. The toolkits have been developed using insight gathered during the ongoing work HSE has been doing with colleagues in NHS Ayrshire and Arran Health Board.

The toolkit is designed to help managers and others start potentially difficult conversations with their employees to begin the process of seeking to prevent and manage work-related stressors and mental ill health.

They are intended for use by small and medium-sized employers but can also help larger organisations. All the HSE talking toolkits are available at: <https://www.hse.gov.uk/stress>.

In addition, HSE has also developed a HSE Mobile Application for SMEs. This provides easily accessible information on risk management and control, with guidance on undertaking a stress risk assessment. A link to the Mobile App can be found here: <https://books.hse.gov.uk/HSE-Mobile-App>.

Also, please remember to look after your own mental health and that of your colleagues. Many health and safety professionals have been carrying heavy workloads over this period. Remember we should apply the same rules to ourselves as we would to others.

Health and Safety Executive inspections focus on occupational lung disease

Devastatingly, last year in the UK, 12,000 people died from lung diseases estimated to be linked to past exposure, from work in a range of sectors. There is scientific evidence that exposure to welding fumes can cause lung cancer and exposure to metalworking fluids can cause a range of lung diseases, including occupational asthma and occupational hypersensitivity pneumonitis (OHP), which are debilitating diseases with life-changing impact.

From World Asthma Day 2021 on 4 May, HSE began an initiative inspecting fabricated metal businesses across Great Britain, to ensure employers and workers are aware of the risks associated with the activities they undertake. HSE will be checking for compliance with: welding fumes guidance; metalworking fluid guidance, and that duty holders can demonstrate they have measures in place to manage risks and protect their workers from occupational lung disease.

Information about preventing occupational lung disease can be found here: <https://www.hse.gov.uk/lung-disease/>.

Welding fumes guidance and metalworking fluid guidance can be found here: <https://www.hse.gov.uk/welding>.

* * *

LAND CONTAMINATION AND DEVELOPMENT – GUIDANCE FROM SCOTTISH REGULATORS

by Sarah Hamill, Contaminated Land Officer

It is common knowledge that the UK's industrial history has left us with a legacy of sites with land contamination issues. Everyone is keen to see this legacy dealt with and so the opportunities that development and regeneration of these sites provide are welcomed. Even during these difficult times we are fortunate to still see development and regeneration sites coming forward. However with this comes a wide range of reports. As a regulator we receive reports ranging from The Good and the Bad and even to the Ugly, and there is nothing that frustrates us more than when we receive sub-standard reports that fail to address the main issues of land contamination.

Improving the quality of reports relating to land contamination is a popular topic across the contaminated land community. It was the subject of a virtual panel discussion hosted by EnvironmentAnalyst on 19 January, and also a roundtable discussion at the Brownfield Land Scotland Virtual Conference on 2-3 February. There were several suggestions on how we could 'raise the bar' but the one theme that carried through was that as a community (regulators, consultants and contractors) we all have a role to play in educating developers. It is

evident that many developers do not fully appreciate the importance of dealing with issues from the ground up, and so the ground investigation (especially the assessment of environmental risks) is often an afterthought. This can mean that by the time the ground is suitably investigated, the design and layout of the development has been decided and so the measures required to deal with what is found can often disrupt the proposals and programme.

As a community we have a responsibility to better engage with and inform developers. Pre-application discussions are a good way to do this as ground conditions can be considered and sometimes even addressed at an early stage. However, while we may be seeing an increase in pre-application discussions the majority are for large-scale developments. We therefore have a responsibility to ensure that small-scale developers also understand what may be required so that they can assess the potential implications. To be faced with numerous conditions at the planning stage may be overwhelming especially when they did not even consider it as an issue.

To try to resolve this, Scottish regulators produced a Guidance for Developers booklet in 2010. The purpose was to highlight key issues that need to be considered when embarking on projects where land contamination may be an issue, as well as highlighting the standards expected by Scottish local authorities. The problem with this was that it was a snapshot of guidance at that time with no single organisation taking ownership of it. A revised version was published in 2019 after a major overhaul of the content as it was felt that a more detailed piece of guidance was necessary including more information on what is, and more importantly, what is not accepted. This time, however, we were fortunate to be able to do this under the remit of Environmental Protection Scotland (EPS) meaning that the most up-to date version could be made available online and any changes and updates could be more easily made.

https://www.ep-scotland.org.uk/wp-content/uploads/2019/09/ConLanDevGuide_12-Aug19-FINAL.pdf.

While the original document was titled 'Guidance for Developers' this updated version has been written to also benefit local authority officers, consultants and contractors when preparing and/or reviewing site investigations, risk assessments, remediation strategies/schemes and

verification plans/reports. This document is recognised and used by the majority of Scottish local authorities and is also endorsed by both REHIS and SEPA (Scottish Environment Protection Agency). To ensure developers are aware of it some authorities ask that it is included in the planning packs sent out with other planning information. EPS had scheduled a launch day for May last year where developers were invited to attend but the COVID lockdown resulted in this being delayed. It is still their intention to run this, possibly as a 'virtual' webinar event. In the meantime, we would appreciate if everyone could help to promote this document and encourage developers to take cognisance of this.

There are some differences on how land contamination issues are assessed across the nations (in particular in relation to the water environment) and this guidance has been written specifically for Scotland. However, there are also key issues discussed that apply across the UK (e.g verification) so this document may act as a useful reference for all. Feedback is welcome and so after reading the document, please email any comments to admin@ep-scotland.org.uk under the subject title 'Land Contamination and Development' so that this can be forwarded onto members of the steering group.


* * *

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on Twitter**

PROFESSIONAL DEVELOPMENT

 Karen Keeley, Director of Professional Development

Professional Examinations

The professional examination diet originally planned for September 2020 was rescheduled and took place in a socially distanced manner on 18-20 May 2021. It was pleasing to note that all candidates passed. We welcome four new holders of the REHIS Diploma in Environmental Health and one new holder of the SFSORB Higher Certificate in Food Standards Inspection.

As all Environmental Health Officers and Food Safety Officers will know, the time and effort that goes into achieving these qualifications is significant. Huge congratulations go to all candidates.

Continuing Professional Development (CPD)

A significant number of CPD submissions for the calendar year 2020 were received and have been processed. A number of Chartered EHOs took advantage of the extension to the date of submission for the three-yearly report. These require to be with the Institute by 31 July 2021. For those due to complete a written submission, guidance is available at <https://www.rehis.com/members-area/cpd-card>.

Written submissions are due for each three-year period and can be submitted at any point within the three-period to which they apply.

If you are a new member or newly embarking on achieving Chartered status, or simply wish a reminder of the requirements of the Scheme, a copy can be found at <https://www.rehis.com/page/scheme-continuing-professional-development-regulations-and-code-practice>.

I would encourage all EHOs to seek Chartered status as it is an excellent means to evidence your ongoing completion of professional development and commitment to your profession.

Professional Courses

As with so many things, the running of Institute professional courses was significantly affected in 2020 due to the coronavirus pandemic.

In November 2020 courses recommenced in a virtual manner. The well-received Environmental Health Update was delivered free of charge to members and the ever-popular Witness Familiarisation course was delivered through Microsoft Teams by Betty Bott, former Procurator Fiscal. Delegates and Betty were pleased to

be able to complete the course in a virtual manner, and the feedback indicated that the course proved to be as beneficial virtually as it is in person.

The Pollution Update was hosted through Microsoft Teams by Andrew Campbell, the Council member with responsibility for pollution matters. The event included speakers on Electric Vehicles and Charging Infrastructure, Hydrogen Fuel Cell Development in the Transport and Energy Sectors, Ensuring Environmental Protection & Governance in Scotland Post-Brexit, Exploring What the Changes to Planning Frameworks Mean for Brownfield Land Development and Demonstrating the Importance of Verification in a Brownfield Redevelopment Project: A Regulator's Perspective. Copies of presentations are available in the members-only section of the website.

In light of the funding made available for additional resource to assist with 'COVID Regulations', there was a need identified for training on general enforcement techniques and skills to assist the new Public Health Compliance Officers in the role. The Institute worked with Chris Seyfried, Chartered EHO, and delivered four sessions of COVID Compliance and General Enforcement Training. Further sessions of the training will be arranged should a need be highlighted.

The Food Update was hosted by Martin Keeley, Council member with responsibility for food matters, on 1 June. The event proved very popular and included speakers from Food Standards Scotland on its new Strategy and Corporate Plan, and the Recovery Plan for Inspection of food businesses; from Just Eat detailing how the business is helping to improve food safety; speakers on zero alcohol spirits and egg safety, and as a last minute alteration to the programme, an overview of how Sea Fish adapted to delivering training in a virtual manner. Copies of presentations are available in the members-only section of the website.

The Crime Investigation and Statement Writing course was delivered, again using Microsoft Teams, by Betty Bott on the mornings of 8 and 9 June. This is always a popular course and its virtual delivery did not distract from this.

The Health and Safety Update, to be hosted by the Institute's current President and Council member with responsibility for health and safety matters, Lisa McCann, is planned for September.

You can register for e-alerts from the home page of the website to receive notification of any events as soon as they are posted.

For the foreseeable future all events will be delivered in a virtual manner, although the Institute is very aware of the significant benefits of face-to-face networking and we are currently investigating the best way to deliver events going forward.

Scottish Food Safety Officers' Registration Board (SFSORB)

A new qualification, Higher Certificate in Food Practice, was subject to consultation with relevant stakeholders and has been approved by the SFSORB and the REHIS Council. The new qualification replaces the current three Higher Certificate qualifications and modernises the route to qualification for food safety officers. The

Higher Certificate in Food Premises Inspection, Higher Certificate in Food Standards Inspection and Higher Certificate in Official Control will remain available for a period of time to allow those in possession of one or two Higher Certificates to complete the suite, should they choose. All those currently registered on any of the Higher Certificates have been informed of their options with regards to continuing on the current qualifications, or transferring to the new qualification. Details of the qualification are available through the Institute's office or by emailing karen.keeley@rehis.com.

If there are any queries regarding Professional Development matters, the Director of Professional Development can be contacted at karen.keeley@rehis.com.

* * *

COMMUNITY TRAINING

by Jackie McCabe, Chief Executive / Director of Training

REHIS is a long-established awarding body in Scotland for qualifications in Food Hygiene, Food and Health, HACCP, Control of Infection, Occupational Health and Safety, First Aid and Licensing. Courses leading to REHIS qualifications are available at approved training centres throughout Scotland and delivered by suitably qualified registered presenters. Industry and Enforcement Officers recognise REHIS qualifications, not just in Scotland but nationally and internationally.

Since the Institute introduced regulations over a year ago to allow courses and examinations to be delivered virtually, many REHIS approved training centres have risen to the challenge and are offering virtual training via platforms such as Zoom and MS Teams. As restrictions are easing, some centres are now starting to arrange 'face-to-face' training whilst adhering to Scottish Government COVID-19 guidance and strict social distancing measures. Course presenters have done a fantastic job of adapting their training methods and course materials to offer various options to their learners. I would like to thank all the REHIS approved training centres and presenters for their never-ending enthusiasm and their continuing support.

For the first time ever, the presenters' update seminar took place virtually via Zoom on 17 March, with over 100 delegates attending. The seminar started with a welcome from our President, Lisa McCann, and continued with me giving an update of new developments including the launch of the REHIS Scottish Licensing qualifications. We then had a great line up of speakers including Dr Margaret Douglas from Edinburgh University who gave an excellent overview of COVID in public health. Next on was Chris Seyfried, a Chartered EHO who spoke about the enforcement of COVID regulations. The seminar was finished off with Lorna Ross and Lucie Armstrong, both REHIS course presenters, sharing their experiences of delivering remote/blended learning.

The event was very well received by the delegates and the Institute is grateful to all the presenters and the delegates for their participation in the event.

REHIS EATING WELL FOR OLDER PEOPLE TRAINING COURSE

by Sue Newall, Project Support Officer, Eat Well Age Well



Eating well is important at any age but especially so as we get older. The connection between what we choose to eat and our health has been well documented, and eating a balanced diet along with physical activity has been shown to contribute to greater independence as we age. Yet ageing can have its own specific barriers to eating well. Physiological changes such as a weakened sense of smell and taste, along with a reduced thirst sensation and increased use of medications and illness, can have an effect on what and how much we eat and drink. How we're able to access food can also contribute negatively to changes in diet such as difficulties accessing shops due to reduced mobility. Financial problems or limited cooking knowledge are also issues.

While a healthy diet is important, another factor to consider is the significance of the social aspects of eating and its impact on wellbeing. Loneliness and social isolation have been shown to affect how and what we eat. Ageing can put us at greater risk of loneliness for a variety of reasons; health concerns may limit our ability to be socially active, the greater geographic diversity of families and bereavement can all play a part, and the COVID-19 pandemic has only exacerbated this problem.

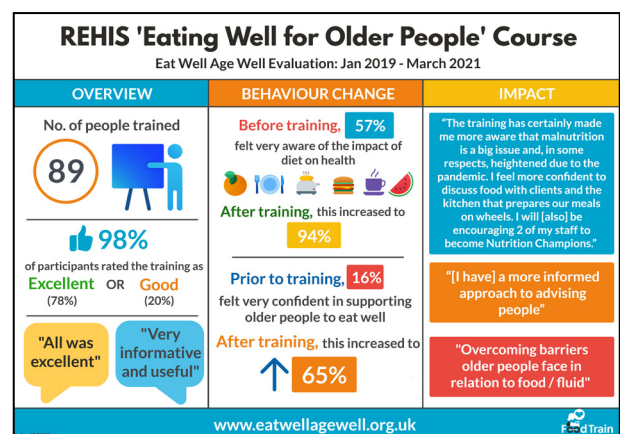
Eat Well Age Well is a national project from the award-winning Scottish charity Food Train. Our focus is on tackling malnutrition in older people living at home in Scotland. Since January 2019, Eat Well Age Well has been offering the REHIS Eating Well for Older People training course with the aim of delivering the training across Scotland. Courses have been previously held in Livingston, Glasgow, Dumfries and Inverness. However, due to the COVID-19 pandemic, all training has now moved online with participants attending the course virtually.

The course aims to provide participants with the knowledge and appreciation of the importance of nutrition and health for older people and how to support them to eat

well. It also explores the causes, signs, symptoms and health risks of malnutrition (as undernutrition) and dehydration as well as understanding the influences and barriers which can affect food and fluid intake for older people. Malnutrition in the community in Scotland is not routinely measured, therefore the true extent of the problem is unknown. Data from the Malnutrition Task Force estimates that 1 in 10 people living in the UK today is at risk of being malnourished, which equates to approximately 103,000 older people living in Scotland. However, from our own prevalence data, we think this may be an underestimate, with as many as 30% of older people living in the community at risk.

From January 2019 to March 2021, 89 people took part in the training. We offer the course to individuals who work with or are interested in supporting older people, and also to older people themselves. This includes staff and volunteers from community projects, community health workers, clinical practitioners including occupational therapists, physiotherapists and nurses, paid carers from local authorities and private firms and unpaid carers. The feedback from participants has been overwhelmingly positive with 98% rating the training as either excellent or good.

Evaluation of the training has shown positive changes with participants reporting an increase in knowledge, understanding and awareness of the factors that impact on healthy eating and malnutrition in older people. Prior to the training, participants generally had some understanding of the impact of food and nutrition on good health but only 16% were confident that they would be able to advise and support older people to eat well. Following the training, 99% felt they had a good understanding on why good nutrition and health is important for older people, with 65% very confident that they could offer advice and support.



The training has certainly been impactful with participants keen to put their learning into practice. Feedback has included statements such as participants having a “more informed approach to advising people”, as well as making changes in working practice: “The training has certainly made me more aware that malnutrition is a big issue and, in some respects, heightened due to the pandemic. I feel more confident to discuss food with clients and the kitchen that prepares our meals-on-wheels. I will be encouraging two of my staff to become Nutrition Champions.”

The Eat Well Age Well project continues to offer this training for free alongside its own Raising the Awareness of Malnutrition training. To register for either course visit the Eat Well Age Well Website at www.eatwellagewell.org.uk.



Eat Well Age Well training group prior to COVID-19.



REHIS Eating Well for Older People Training Booklet.



Eat Well Age Well training group prior to COVID-19.

* * *

CHANGED JOBS / CONTACT DETAILS?

Help the Institute to maintain an accurate members' database by advising us of any changes to your employment or contact details.

Please click on the link below and complete and return the form to contact@rehis.com.

Thank you.

<https://www.rehis.com/page/update-members-database>

MANAGEMENT COMMITTEE

by Louise Cunningham, Senior Vice-President

The Management Committee has met three times so far in 2021, in January, April and June, and continues to utilise Teams meetings of an evening, allowing Council business to fit around busy work schedules. As agreed earlier in the year, Council meetings will remain virtual for the remainder of 2021 to allow for the current restrictions and remove any uncertainty should things change at short notice, such is the nature of business during a pandemic.

Following last year's decision for the Presidential Team to remain in post for a second term, I've had the opportunity to bring a second Development Plan to the January meeting of the Management Committee. The plan is referred to throughout the year to ensure we continue to work towards our aims and objectives for the Institute, and I would like to thank the Committee members for their guidance and input prior to the Plan being ratified at the March meeting of Council.

Within the Development Plan is the task of a Strategic Review on a three-yearly basis. This is an opportunity to assess specific aspects of work within the Institute, allowing a closer look to identify any potential

improvements, efficiencies or learnings. The Strategic Review is perhaps timely, as the Committee has agreed that this will be taken forward in advance of the AGM and focus on the post COVID-19 learning for the Institute. I look forward to working on this and reporting at a later date on what I expect to be many positive aspects from the previous 15 months or so, given the commitment and flexibility demonstrated on a daily basis by both staff and members throughout these difficult times.

Recruitment

Applications have now been invited for the vacant Director of Training post, following Jackie's promotion to Chief Executive. The role is pivotal to the workings of the Institute and the delivery of training in our communities. Members will be updated as and when the recruitment process has been completed.

Our next meeting takes place in September, when we hope to be finalising plans for the AGM and Update event. No decision has been made as to whether the event will remain completely virtual for a second year or not.

* * *

**REHIS WELCOMES THE
SUBMISSION OF ARTICLES FOR
PUBLICATION IN**

***ENVIRONMENTAL HEALTH
SCOTLAND***

**REHIS WELCOMES
REPORTS OF INTERESTING
COURT CASES FOR
PUBLICATION IN**

***ENVIRONMENTAL HEALTH
SCOTLAND***

SCOTTISH LOCAL AUTHORITY EXPERT OFFICER WORKING GROUP

by Lisa McCann, REHIS President and member of the group

When the COVID-19 pandemic struck at the start of 2020 and the nation entered a “lockdown” – a now familiar, but at the time new, term – situation, the need was quickly identified for regulatory bodies to take action where businesses or individuals chose not to comply with rules. Given the situation was national it was immediately apparent that a consistent approach across Scotland would be beneficial. The close working relationships that local authority regulatory services have in Scotland, both within their professions and with each other, meant that through the Society of Chief Officers of Environmental Health in Scotland (SoCOEHS) and the Society of Chief Officers of Trading Standards in Scotland (SCOTSS) this was very quickly established to form the (now familiar) Scottish Local Authority Environmental Health and Trading Standards Expert Officer Working Group, or “ETC” for short.

Representatives from both Environmental Health and Trading Standards Departments in local authorities across Scotland make up the group and liaise with other organisations, including the Scottish Government, HSE and Police Scotland, seeking a consistent approach. The extent of lockdown was unknown in the beginning, but the ETC has been able to share experiences and advise on consistency issues over the period, through numerous reviews of legislation and guidance.

The work of the ETC has been, and continues to be, invaluable with frequent meetings to discuss key challenges, as well as offer support to one another through such a challenging time. A key positive of the ETC has been the use of technology to bring together professionals from across professions and organisations to work together collectively and efficiently for the public health pandemic response.

As the Professional Institute for Environmental Health in Scotland, REHIS would emphasise the significant benefits of the training of Environmental Health Officers, which has deep roots in public health matters and ensures officers are able to adapt very quickly to a changing work environment and changing priorities, while focusing on situations of greatest risk. These skills have never been more utilised than in the move to assessing business for compliance with new COVID regulations, offering advice on the new norm of social distancing and control measures, and taking enforcement action when appropriate to do so. The skills and knowledge of EHOs meant they could immediately participate in Scotland's Test and Protect system and contribute significantly to the reduction in spread of the virus.

All public health professions have clearly had a significant role during the COVID-19 pandemic and the rapid formation of the ETC meant that Local Authority Regulatory Services through SoCOEHS & SCOTSS could immediately disseminate Scottish Government-issued information across Scotland, but equally feed back on real life challenges with business compliance with new legislation and guidance. The work of the Group has improved the profile of the profession and evidenced the vital work of Environmental Health Departments across the country, in helping to maintain and improve public health.

Members of the ETC during the Pandemic Period:

Local Authority:	Officers:
Aberdeen City	Del Henderson Andrew Morrison Graeme Paton Hazel Stevenson
Aberdeenshire	Graham Robertson
Argyll & Bute	Jo Rains Patrick Mackie
Dundee City	Lindsay Matthew
Edinburgh	Chris Bell
East Dunbartonshire	Veronica McGinley
East Renfrewshire	Mark Smith
Fife	Lisa McCann (also represents REHIS) Lyndsey Radke
Glasgow City	Rachel Allan Graeme Lindop Lorna McCoull
Highland	David MacKenzie
North Lanarkshire	Michelle McKenna
South Ayrshire	Brian Lawrie (Chair) (SoCOEHS) Morton Houston (Vice Chair) (SCOTSS)
South Lanarkshire	Craig Brown
West Dunbartonshire	Tony Cairns
SCOTSS Coordinator	Ken Daly

CHANGES TO LICENSING REGIME FOR RESIDENTIAL CARAVAN SITES

by Joe Harkin, Chartered Environmental Health Officer

Introduction

The purpose of this report is to demonstrate the new learning and understanding in relation to changes in legislation and inter alia changes to licensing requirements for residential caravan sites. Specifically, it relates to a site in a local authority area with permanent residents. The intended outcome was to obtain approval for the adoption of new arrangements for licensing these sites, and for the granting of a new site licence as the conclusion.

Description

Historically a significant number of people through choice or circumstances live permanently in caravans situated on permanent sites. Since the 1960s, anyone intending to own and operate a permanent caravan site has been required to obtain planning permission and to have a licence granted under the Caravan Sites and Control of Development Act 1960. The licence was essentially granted forever, and was underpinned with conditions from the model standards.

Concern had been growing that people living on these sites did not have anywhere near the rights afforded to other tenants such as those living in private rented accommodation. The model standards afforded some basic rights such as fire safety and space standards but did not cover many quality of life and tenure security issues that other tenants, and owners, took for granted.

There was evidence that some site owners had links to serious and organised crime and it was also acknowledged that it was almost impossible to remove a licence once granted so there was no real deterrent for a site owner who mistreated residents.

After many years of consultation, the Scottish Government introduced the revised licensing and enforcement framework for mobile home sites with permanent residents. Legislation was introduced, namely the Caravan Sites and Control of Development Act 1960 (as amended by the Housing (Scotland) Act 2014) and the Licensing of Permanent Relevant Sites (Scotland) Regulations 2016.

Considerations

Following legislative amendments to the Caravan Sites and Control of Development Act, a new system for licensing and controlling permanent residential mobile home sites was introduced. The key elements are:

- Local authorities have a range of new powers in relation to the granting, management and revocation of licences;
- Licences have to be renewed every five years;
- The licence holder (and anyone directly managing a site) must be a fit and proper person; and
- An effective process for licence holders and applicants to appeal any relevant decisions of the local authority.

The site in the local authority area, which currently held a licence in terms of the Act, had until 1 May 2019 to apply for and obtain a new site licence. Otherwise, it would no longer be licensed. This site has planning permission for 33 mobile homes.

Historically the site had a reputation as a badly-run site with residents being poorly treated and feeling very insecure. There were many allegations of criminality such as theft, illegal supply of electricity and even caravans being removed from the site without permission of owners. There were also allegations that a previous site owner with a serious criminal conviction was still effectively managing the site and intimidating residents.

As a consequence of this, the police and the local councillor had many meetings with Officers of the Environmental Health service. Residents had complained directly to the service on many occasions over the years. It was clear that this was precisely the type of site that the new legislation was intended for.

The new licensing arrangements for permanent residential sites differed significantly from those previously in place. Previously, a licence could last indefinitely and there were no requirements for renewal. In addition, once a licence was granted, there were limited powers to address any failure to comply with the conditions attached to it.

I saw that the new provisions provided local authorities with more options to ensure that any breaches of licence conditions could be resolved more effectively. Whilst this was a positive change in terms of helping to protect the health, safety and welfare of residents on licensed sites, it did increase the resource and administrative burden for local authorities.

It was evident by this stage that there were many aspects of the new legislation covering areas that, as a team, we had no experience of dealing with, such as the “fit and proper person” test, establishing fees and who actually licenses the site within the council.

To this end, we had several meetings with a senior solicitor in the council, which was very beneficial. Although the Scottish Government guidance clearly states that committee approval is not required in order to introduce a scheme to facilitate the issue of a licence, the solicitor's view was that we should get such approval as he felt this would strengthen our hand should we receive any objection or challenge at a later stage.

I also noted that the Act allowed local authorities to recover the costs of licensing sites through a scheme of fees. This, however, does not cover any additional work to monitor sites, respond to concerns or enforce non-compliance issues during the lifetime of a licence. These would need to be pursued separately if necessary.

The process for considering new applications for a site licence, applications for the renewal of an existing site licence and applications for the transfer of an existing site licence, followed the principles set out in the Act and in the accompanying guidance issued by the Scottish Government. More detail of this process and the guidance can be accessed at <https://www.gov.scot/publications/guidance-local-authorities-licensing-system-mobile-homes-sites-permanent-residents/>.

Upon receiving an application for a mobile home site licence, the council had to decide if the licence holder (and any other relevant person involved in the management of the site) was a "fit and proper person". Not meeting the requirements of the test might result in a licence being refused. In applying such a test, a local authority must have regard to all of the circumstances of the case. Some matters are specifically included but this does not prevent a local authority from considering other matters which it considers relevant.

A local authority must consider material that shows that a person has:

- Been convicted of a relevant offence
- Contravened the law in relation to caravans, housing, landlords and tenants
- Breached a written agreement under the Mobile Homes Act 1983
- Broken the rules that apply to charges and reselling of electricity, gas and water
- Engaged in antisocial behaviour within the meaning of the Antisocial Behaviour etc. (Scotland) Act 2004
- Breached site licence conditions.

In applying the "fit and proper person test", the local authority can require a person to provide a criminal conviction certificate. However, this can only be required when the local authority has reasonable grounds for believing that information they have been provided with (in relation to past convictions) is inaccurate.

The authority may also, under certain circumstances, share information with other local authorities where it

may be of relevance to any "fit and proper person" test being applied by those authorities for the purposes of residential mobile homes site licensing. The law allows this information to be shared even if there is a duty of confidentiality owed to the person that the information is about.

After the application had been received, it was passed to Police Scotland, the Scottish Fire and Rescue Service, other relevant council services including Planning, Housing and Community Safety, and other local authorities where the applicant had operated, for consultation.

Perhaps as a reflection of the fact that the applicant was entirely new to the site, no objections or representations were received. Consequently a formal site inspection was carried out and, as expected, several issues were identified which were communicated to the applicant. Pleasingly all matters were rectified in a short period of time which historically had never been the case.

As there were no unusual features of the application, the licence was granted administratively. Had there been any objections, representations or unusual features, the application would instead have been referred to the Council's Housing Appeals Board for determination. It is also proposed that the Housing Appeals Board should deal with any cases where the Council is considering revoking an existing site licence.

I noted that the Scottish Government had published (December 2018) new model standards for the licensing conditions that a local authority can put in place when it issues or reviews a licence for a relevant permanent site (a mobile home site with permanent residents). The model standards set out an appropriate baseline for an authority's licence conditions.

A local authority, however, is not limited to only setting conditions that are set out in the model standards, and can take the view that it wishes to impose additional licence conditions where appropriate. Conditions for any new licences issued in the local authority are largely based on the new model standards, developed in conjunction with colleagues from the council's legal service, and will be reviewed and/or varied from time to time where required.

I noted that the new model standards removed a condition previously detailed relating to fire safety precautions. It is considered by the Scottish Government that the oversight of this necessary condition rests solely with the Scottish Fire and Rescue Service under the fire safety legislation that they specifically enforce.

It became apparent to me that the new licensing system provides for a greater level of scrutiny and consideration of those who will hold a licence and manage sites. However, because the revised processes are more detailed and robust, the determination of any licence applications and renewals will have an impact on local authority resources.

Under the revised legislative framework, local authorities are able to charge a fee for handling new licence applications and renewals. The fees should be reflective of what the local authority considers are reasonable costs in terms of handling a first site licence application and the average cost to it of handling a site licence renewal application. The fees are only intended to cover the costs of determining applications. They do not cover the cost of any separate enforcement action that might be required at any other time. These costs can be recovered by other means if necessary.

Through discussions with our legal services, it was considered important to show how we determined our fees in case of challenge, and officers from the environmental health team carried out a robust exercise to determine the proposed fee structure. The suggested fees were determined in line with the factors outlined in the Licensing of Relevant Permanent Sites (Scotland) Regulations 2016 and reflect what the local authority believes will be the reasonable cost of handling a first site licence application and the average cost of handling a site licence renewal application.

It was recognised that the licence fees proposed for sites in the local authority were higher than the estimate provided as an example in the Scottish Government guidance. However, the assessment was felt to be a more accurate reflection of the work and impact on the local authority from the determination of licence applications and renewals.

The revised legislative framework for the licensing of permanent residential mobile home sites also introduces a range of new enforcement powers. Where appropriate, these measures can be used by officers from Environmental Health to tackle those site owners who do not comply with the licensing system and any site licence conditions. It is important to note that the use of these powers should always be proportionate and in the context of the significance and severity of any breaches.

In line with the normal hierarchical approach to all regulatory enforcement matters, informal measures would generally be considered and used first. However, where informal approaches are not successful or where issues require more serious or urgent attention, there are now a number of formal options available to officers. These are as follows:

- Improvement notices
- Penalty notices
- Revoking a licence
- Appointment of interim management
- Emergency action on a site
- Report to the Procurator Fiscal for prosecution

Local authorities will also have the power to recover the costs of enforcement sanctions and actions in certain situations.

Outcomes

At the end of the process a very positive outcome was achieved with the caravan site in question being granted a new licence. Consequentially this allowed our service to raise standards at the site to a level never before achieved. The local councillor who had been closely observing the process was very pleased with the results.

It would appear that in this case the new legislation has had a beneficial effect on the residents at the caravan site.

Conclusion

Prior to the introduction of the new legislation and supporting framework, I had limited experience in dealing with caravan sites. Any knowledge that I did have was gained in a previous council more than 20 years before, under soon-to-be-redundant legislation.

The process seemed daunting given the number of new concepts and the previous difficulties with the site. I attended a training session and had many internal meetings, including with our legal colleague, which greatly helped me to understand how the new framework would work as well as the limitations of the legislation and guidance.

The Scottish Government guidance was a good source of learning and Officers from other authorities who had the same family running sites in their area helped me to understand how the process should roll out in practice.

As a result of this, myself and my team managed to work through the process and issue the licence in advance of the deadline and, as previously mentioned, the residents have benefited from the new standards.

This report evidences new learning in the core activity of built environment and shows underpinning skills and knowledge in communication, collaborative working and evaluative practice.

Editor's Note

Joe is a Chartered EHO and submitted the full report in compliance with the REHIS Scheme of Continuing Professional Development, showing personal new learning/development in the subject of built environment.

DOG KENNELS NOISE IMPACT ASSESSMENT REPORTS – THE CHALLENGES AND A WAY FORWARD

by Tanya Grosle, Chartered Environmental Health Officer

Introduction

There is no specific guidance document within Scotland nor recommended target noise levels relating to dog kennels, whether the kennels are used for boarding or breeding. In the absence of a guidance document, reliance must be placed upon proven methods of assessment published elsewhere. This article examines and discusses the broad differences in a snapshot of proposed methodologies approved by local authorities for dog kennels Noise Impact Assessment reports produced by Grosle Environmental Services. Also considered is a relevant dismissed planning appeal for a dog kennels and the subsequent consequences for future dog kennels Noise Impact Assessment reports.

The article provides a reflective evaluation, describing the challenges for acousticians producing dog kennels Noise Impact Assessment reports and why a Scotland-wide guidance document / Code of Practice is necessary in relation to the preparation of dog kennels Noise Impact Assessment reports.

Description

Noise Impact Assessment reports are supporting documents for planning applications; they must be robust and contain sufficient information to enable Environmental Health Professionals to make informed decisions. Before producing said reports, it is increasingly considered good practice to submit a proposed methodology to Local Authorities for review.

Environmental Health Professionals

At this stage, Environmental Health Professionals can request additional considerations or alterations in the proposed method to achieve acceptance.

The proposed methodology should contain a minimum of the following information:

- the assessment method,
- details of the measurement and calibration equipment,
- location and times for background noise monitoring,
- on-time for dogs barking each hour,
- number of dogs to be exercised externally outwith the dog kennels

Discussed below are seven approved methodologies, produced since 2016. These were all accepted by

Local Authorities for dog kennels ranging from small to medium (numbering 9 to 28 dogs). The dog kennel designs varied from semi-enclosed exercise runs, considered a 'traditional' kennels design, to enclosed kennels with a separate outdoor exercise area. The Local Authorities in question are not specified, except for Aberdeen City Council due to a dismissed planning appeal during 2019 discussed within this article to highlight concerns with a way forward.

The dismissed planning appeal was a Change of Use of an existing stable building to a dog hotel at Aberdeen Pet Resort, Culter House Road, Peterculter, Aberdeen. The appeal details are available on the Scottish Government Planning and Environmental Appeals Division website (Planning appeal reference: PPA-100-2096) <http://www.dpea.scotland.gov.uk/CaseDetails.aspx?id=120168>.

Considerations

Detailed below are the various considerations within the seven approved methodologies with a discussion of the broad differences between them:

• Assessment Method

The assessment method, approved by the Local Authorities, had broad differences that changed over time since 2016. The various assessment methods are described below:

1. SHDC SPG

South Holland District Council Supplementary Planning Guidance entitled 'Location of premises for the boarding and breeding of dogs and other animals', issued in December 1999. This Council carried out detailed research on this topic during the late 1990s, and this research culminated in the publication of this Supplementary Planning Guidance. The assessment method is based on a simple assessment method using the older BS 4142:1997 version and is easy to understand. The methodology requires that the specific noise from barking dogs should not exceed the existing background noise at noise-sensitive locations during the day and night time.

2. WHO

The assessment method compared the dog barking noise levels to target noise levels within the World Health Organisation Guidelines for Community Noise.

3. BS 8233:2014

The assessment method compared the dog barking noise levels to the target noise levels contained within British Standard 8233:2014 Guidance on Sound Insulation and Noise Reduction for Buildings.

4. BS 4142:2014

The assessment method was British Standard 4142:2014 Methods for rating and assessing industrial and commercial sound.

5. PAN AND TAN

The assessment method was Planning Advice Note 1/2011 and the accompanying Technical Advice Note: Assessment of Noise.

6. BS 4142:2014+A1:2019

The assessment method was British Standard 4142:2014+A1:2019 Methods for rating and assessing industrial and commercial sound.

Concerning the dismissed planning appeal (Planning appeal reference: PPA-100- 2096), the reporter decided that British Standard 4142:2014 best fits the guidance in the Scottish Government's Technical Advice Note: Assessment of Noise as a basis on which to assess potential impacts of dogs barking better than British Standard 8233:2014.

In addition to the above, the reporter's decision did not specifically mention the acoustic penalties added to produce the rating level; however, the reporter accepted the objector's noise consultants BS4142 assessment. The acoustic penalties added were a correction of +9dB for the impulsive sound (determined as highly perceptible) and an additional +3 dB for intermittent sound. A point to note was that the acoustic penalties were for the noise consultant's scenario based on four dogs exercising within an external exercise area with a 2.2-metre high barrier surrounding the dogs. The distance from the external exercise area to the nearest residential house was 95 metres, with an enclosed dog kennel (with high sound reduction properties to the building design) between the external exercise area and the nearest residential house, producing additional sound reduction.

The acoustic penalties used are significant because they are added to an already excessive time for barking dogs.

- Background noise monitoring

The background noise monitoring, approved by Local Authorities, had broad differences concerning the length of measurement times and periods within the proposed methodologies. The range included 90 minutes to three hours of manned monitoring during

the day and 45 to 90 minutes of manned monitoring during the night.

Concerning the dismissed planning appeal (Planning appeal reference: PPA-100- 2096), the reporter decided that the baseline assessment should have included readings taken in the early morning, evening, and weekend. Due to this decision, a subsequently proposed methodology was requested to be amended by a Local Authority to include an extensive background noise monitoring programme for the week and weekend that included manned monitoring during the early morning, day time and evening. The weekend noise monitoring times were taken simultaneously as the weekday noise measurements to compare the background noise level.

- On-time for dogs barking each hour

The on-time for dog barking each hour, approved by Local Authorities, had broad difference ranging from 10 to 30 minutes of dogs barking each hour during the day and night.

In relation to the dismissed planning appeal (Planning appeal reference: PPA-100-2096), the reporter's decision did not specifically mention the need to use 30 minutes of dogs barking each hour during the day time and night time; however, the reporter accepted that the objector's noise consultants BS4142 assessment based on 30 minutes of dogs barking each hour during the day time and night time.

This range of on-time for dog barking each hour is significant due to several factors discussed below:

- The South Holland District Council Supplementary Planning Guidance uses an on-time for dog barking of 10 minutes each hour, based on the number of dogs multiplied by a factor of 0.6. This guidance was produced following extensive research.
- The decibel difference between 10 and 30 minutes and thirty minutes of dogs barking each hour produces a significant increase in decibel difference.
- The on-time is the measure of dogs barking each hour. In reality, within a kennel, this would mean every dog is barking for a full 30 minutes each hour (either continuous or intermittent). This fact could be considered excessive and onerous on applicants who wish to build a dog kennels.
- Suppose a BS4142 assessment is to be used as a way forward for the correct assessment method (discussed above). In that case, additional acoustic penalties must be added to the specific sound level to produce the rating level. Using a 30 minutes on-time for barking dogs and then adding acoustic penalties, can be seen as unreasonable and excessive.

- Number of dogs to be exercised within an outdoor exercise area

Kennel designs varied for each planning application, ranging from the traditional kennels with semi-enclosed exercise runs to fully enclosed kennels, designed with a high sound reduction index, with a separate exercise area. The outdoor exercise area's distance from the dog kennels ranged from adjacent to the kennels to at least five miles from the dog kennels.

Pertaining to the dismissed planning appeal (Planning appeal reference: PPA-100-2096), the reporter's decision stated the worst-case scenario should be based on four dogs using an outdoor exercise area. This decision was based on the objector's noise consultant comments.

A point to note is that there was no justification used in this decision. The exercising of four dogs could be considered poor practice and dangerous, especially if the dogs within the outdoor exercise area are not within the same family group. From a dog owner's point of view, an important fact is that the number of dog owners with more than two dogs can be considered in the minority. Therefore, the scenario of four dogs being exercised outside within an external exercise area is excessive and unreasonable.

Concerning site selection, the document 'Guidelines for the design and management of animal shelters' produced by the International RSPCA suggests that a site should be a minimum of 400 metres from the nearest residential housing. However, the scenario where four dogs exercised outside, barking for 30 minutes each hour with excessive acoustic penalties can lead to the scenario that exercise areas have to be at a much greater distance than 400 metres.

Outcomes

It has been confirmed that there is a broad difference in a snapshot of proposed methodologies approved by Local Authorities for dog kennels Noise Impact Assessment reports produced by Grosle Environmental Services. There is concern that there will be an overburden in relation to the expectations of these reports in the future; especially the use of BS4142, excessive acoustic penalties added to the BS4142 assessment, 30 minutes of dogs barking each hour within a 24-hour period and a minimum of four dogs being exercised each hour within an external exercise area.

It was highlighted that the dismissed planning appeal might set a precedent for future dog kennels Noise Impact Assessment reports, and therefore a Scotland-wide approach is needed. This approach should be straightforward, and easy to understand and interpret by all parties concerned (i.e. future dog kennels owners, architects, acousticians, Environmental Health Professionals and Planning Professionals).

The methodology detailed with the South Holland District Council Supplementary Planning Guidance document could be used as a starting point for this discussion. The document details an assessment method based on a simplified version of the older BS4142:1997 assessment; however, there may be merit in using a similar simplified version.

Conclusion

This article details the broad differences in a snapshot of proposed methodologies approved by Local Authorities for dog kennels Noise Impact Assessment reports. An important issue to highlight is that proposed methodologies can use worst-case scenarios and many considerations approved by Environmental Health Professionals can be considered excessive.

Taking the above into account, this article is produced as an evaluative practice exercise; however, it can also be used as a talking point for why a guidance document / Code of Practice is necessary Scotland-wide concerning the preparation of dog kennels Noise Impact Assessments reports. I would also hope this article assists Environmental Health Professionals with an insight into the challenges faced by acousticians during the production of dog kennels Noise Impact Assessment reports.

If the information within this article is not taken forward, Scotland could be in the position that dog kennels will not be granted due to difficulties in producing Noise Impact Assessment reports which are overly burdensome, or alternatively, dog kennels will be designed to be totally enclosed buildings with the exercise of dogs externally being off-site at a considerable distance to the dog kennels.

Editor's Note

Tanya is a Chartered EHO and submitted the full report in compliance with the REHIS Scheme of Continuing Professional Development, showing personal new learning/development in the subject of built environment.

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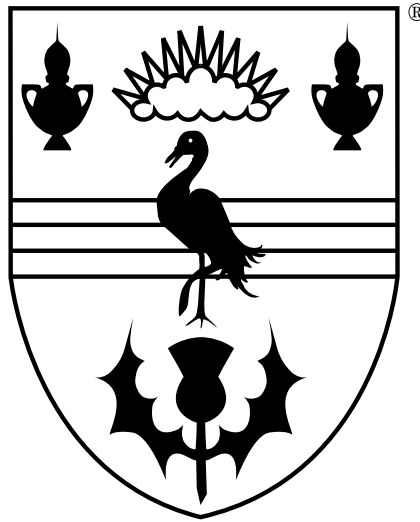
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- a. stimulating general interest in and disseminating knowledge concerning Environmental Health;
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